

Eileen Woltz

From: Pereira, Corinna J - ETA <Pereira.Corinna.J@dol.gov>
Sent: Monday, December 19, 2022 12:53 PM
To: Don Jamison; Toni Giddens
Cc: Eugene Gloudeman; Chris Cotter; Will Monzingo; Christina Morris; Eileen Woltz; Toni Giddens
Subject: RE: Registration of Standards
Attachments: California-Nevada-Apprenticeship-Standards-updated 09.28.2021.pdf; Addendum language for Standards.docx; Addendum Hours and Wages to add to Standards.docx; Appendix A-WPS.docx

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Hello Don,

Try going by this guide:

1. If adding a new occupation to previously approved standards in an SAA state: request the state provide you with their required template docs for approving an additional occupation to existing registered apprenticeship program standards. If the state wants a completely different set of standards for an additional occupation, you'll have to explain that the AJATC is the same for both occupations and you want both occupations in the same set of standards. Normally, this might require a full revision of the existing standards or just a new Appendix A that adds the information needed for the new occupation (selection procedure, work processes schedule, course outline, and wage schedule). But, some State Councils may take issue with multiple occupations in one set of standards. However, there's nothing in the federal regulations preventing multiple occupations in one set of standards under the same committee. In fact, I have programs with 10 or more occupations in one set of standards.
2. If adding a new occupation to previously approved standards in an OA state: add the occupation through the "Occupation Information" tab in RAPIDS, then inform your ATR or state director that you are awaiting approval of the added occupation within RAPIDS. This should produce a new Appendix A for the new occupation. Again, Appendix A's are typically developed as selection procedures, work processes schedules, course outlines, and wage schedules for each occupation. See OA's boilerplate Appendix A-WPS attached for reference.
3. If adding a new occupation to your NGS – National Guideline Standards, provide what the National OA Office asks. They have their own process and templates which it appears they have provided to you in the "Addendum Hours and Wages".

Also, I have provided some comments below in **RED** regarding your previous email responses. I hope this helps.

From: Don Jamison <djamison@calnevjatc.org>
Sent: Thursday, December 15, 2022 3:48 PM
To: Pereira, Corinna J - ETA <Pereira.Corinna.J@dol.gov>; tgiddens@labor.nv.gov
Cc: Eugene Gloudeman <egloudeman@calnevjatc.org>; Chris Cotter <ccotter@calnevjatc.org>; Will Monzingo <wmonzingo@calnevjatc.org>; Christina Morris <cmorris@calnevjatc.org>; ewoltz@labor.nv.gov; tgiddens@labor.nv.gov
Subject: RE: Registration of Standards

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Corinna and Toni,

I'll try to answer both your emails with this combined reply.

Corinna--

*The Mountain States JATC is based out of Utah and they cover the states of MT, ID, CO, UT and WY. - Each state director's office, whether State Agency (SAA) or Office of Apprenticeship (OA), may have requirements that are different due to more stringent or fixed state regulations or legislation.

*Attached are our current approved Standards. A workup version of these "DOL blessed" Standards is provided by the ETA to all IBEW/NECA electrical JATCs. This is what I was referring to as "boiler plate standards". Each program marks up the details that applies to them, then they are sent to their respective local Registration Agencies for approval.

*Not clear on you question about the Subst. Tech. Appendix A?? Appendix A in our current Standards is Apprenticeship Selection Procedures. – I think you are referring to NGS - National Guideline Standards here. I only see that you attached your local standards as approved with Nevada State. For reference, "boilerplate" (in regard to registered apprenticeship) is an approved template only, not approved standards, hence my confusion.

If you'll notice at the end of our current approved Standards (attached) on page 27, it ends with item 26. The original workup version we had included an additional item 27 titled "Addendum". You may notice on the earlier attachment today, a number 27 in front of the title word "Addendum". When we submitted our Standards for approval, we had omitted that last item (#27) because at that time we had no other apprenticeable occupations and was thus not applicable. – I just don't see how the #27 addendum (included in approved NGS or not) would alleviate a registration agency of their obligation to approve a request for a new occupation. Although, there shouldn't be a need for separate standards per occupation. I don't know any state registration agency that has that condition, but if a state requires separate standards for your new occupation, you may be subject to complying for the purpose of obtaining approval. Perhaps ask for the policy requiring it, but definitely make it known that the AJATC is the same for both occupations.

Again, in SAA states, follow the direction of the state agency for adding occupations for apprenticeship approval and in OA states, use the occupation tool in RAPIDS. A map of OA vs. SAA states can be found here:

<https://www.apprenticeship.gov/about-us/apprenticeship-system>

When we asked our National ETA about the steps needed to add/start a Substation Apprenticeship, they sent us the document that I titled, "Addendum Hours and Wages to add to Standards" and sent to you in my earlier email today. – I believe what you were provided by the OA National Office (the "Addendum Hours and Wages") is an outline for a Boilerplate Appendix A. However, I don't see a copy of your existing NGS standards to know for sure. Adding the occupation to your NGS standards via the OA National Office would be helpful when going into new states. But, because you already have approval in some states, you'll work with those individual states to add the occupation(s) according to their own state agency procedures and boilerplate documents.

Toni—

*Just making sure I've got this correct, you need us to just revise our current Standards to include this new occupation rather than a separate new Standard? And we'll do this via the addendum?

*Also, we need to provide a new Appendix A for the Occupation. This new Appendix A is "Apprenticeship Selection Procedures" for our new Occupation (Substation).

*And finally, we fill out and submit a Form 5910 for the new Occupation (Substation) as well?

Thank you both.

Don Jamison

Director

California Nevada JATC

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From: Pereira, Corinna J - ETA [<mailto:Pereira.Corinna.J@dol.gov>]

Sent: Thursday, December 15, 2022 10:58 AM

To: Don Jamison <djamison@calnevjatc.org>

Cc: Eugene Gloudeman <egloudeman@calnevjatc.org>; Chris Cotter <ccotter@calnevjatc.org>; Will Monzingo <wmonzingo@calnevjatc.org>; Christina Morris <cmorris@calnevjatc.org>; ewoltz@labor.nv.gov; tgiddens@labor.nv.gov

Subject: RE: Registration of Standards

Hello Don,

Forgive me, but can you provide some clarity on the following so that I can better address your question/concerns:

- Which “mountain states” you are referring to?
- When you refer to “boilerplate line standards” do you mean DOL-OA approved national guideline standards (NGS)? If so, can you send me the OA Bulletin for this approval or the approved NGS standards?
- Is your attached Substation Technician Appendix A addendum included in OA-approved NGS standards?

Thanks,

Corinna Pereira

U.S. Navy Veteran, MS, MBA

Region 6 Multi-State Navigator

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From: Don Jamison <djamison@calnevjatc.org>

Sent: Thursday, December 15, 2022 9:01 AM

To: Pereira, Corinna J - ETA <Pereira.Corinna.J@dol.gov>; ewoltz@labor.nv.gov

Cc: Eugene Gloudeman <egloudeman@calnevjatc.org>; Chris Cotter <ccotter@calnevjatc.org>; Will Monzingo <wmonzingo@calnevjatc.org>; Christina Morris <cmorris@calnevjatc.org>

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Corinna and Eileen,

I just want to reach out to you two regarding a new apprenticeship program that the Cal/Nev JATC is working on to get registered.

We currently have a "certification" course for some Substation students we have. Now we want to have a formal proper registered apprenticeship for Substation workers.

This is what we're looking at:

Substation Technician Apprenticeship Program

(Electrician, Substation)

O*NET SOC Code: 49-2095.00

RAPIDS Code: 0166

The Cal/Nev JATC Outside Line Apprenticeship, as the name implies, is a multi-state JATC. Actually our industry has divided the entire U.S. into nine (9) multi-state JATCs for the IBEW/NECA Outside Line Apprenticeships. Four (4) of those other Line JATCs also have Substation Apprenticeships that they operate.

When these other JATCs added their Substation apprenticeship programs, our National JATC (the Electrical Training Alliance aka; ETA), which provides us with boilerplate Line Standards, gives us an Addendum to use which allow us to "piggy-back" a Technician program onto our current approved Line Standards. See attachments. The yellow highlights in the Hours and Wages attachment are modifiable by the JATC.

Our neighboring JATC in the Mountain States area is also currently working on adding a Substation Apprenticeship program to their operations. However, their Registration Agency representative wants them to submit an entire separate stand-alone set of Standards, rather than the Addendum to their Line Standards.

Sorry to ramble on but I wanted to get in front of this and ask you folks if you have any preferences/requirements/suggestions regarding the Addendum versus the stand-alone Standards?

Thank you in advance for your time and attention on this matter.

Stay Safe,

Don Jamison

Director

California Nevada JATC

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