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January 19, 2024

VIA EMAIL

Toni Giddens
Apprenticeship Director
Nevada State Apprenticeship Council
Office of the Labor Commissioner
3340 West Sahara Avenue
Las Vegas, NV 89102
NevadaSAC@labor.nv.gov

Re: Revised Standards of Apprenticeship Submitted for Approval by Southern Nevada Operating and Maintenance Engineers JATC (Stationary Engineer – DOT Code 950.382.026 and O*NET SOC 51-8021-00)

Dear Director Giddens:

This firm represents the Board of Trustees and the Training Committee of the Southern Nevada Operating and Maintenance Engineers (Local 501) JATC (“JATC” or “Applicant”). The Applicant has recently revised its Standards of Apprenticeship for the Occupation of Stationary Engineer (“Standards”) (DOT Code 950.382.026 and O*NET SOC 51-8021-00), which are enclosed for your review and submission to the Nevada State Apprenticeship Council (“NSAC”) for its consideration, comment, and approval at its scheduled meeting on February 22, 2024.

In accordance with submission instructions given to this office, we have included a redlined version of the revised Standards showing the material and clerical revisions from the prior approved Standards. These revisions, the first two which are substantive and the remainder are clerical and conforming changes, are detailed below.

Two material changes are proposed. First, Attachment A, Work Processes and Related Instruction Outlines, is amended in Section 4.2 to more clearly state the subjects and kinds of equipment and systems for which on-the-job training (OJT) and related instruction will be provided.

Second, Section XX, Certificate of Completion, is amended to permit the granting of an early conditional Certificate of Completion, upon application of the Apprentice and upon the recommendation of the Employer, Training Director and Local JATC, to an Apprentice based on objective evidence of the Apprentice’s satisfactory training or unusual proficiency in the trade when the Apprentice has completed 42 months of the 48-month program, minimum of 7,000 of OJT, and all required coursework and is in good academic standing.

The existing Standards permit granting an early Certificate of Completion only upon the Apprentice’s successful completion of all academic requirements, 8,000 hours of OJT, and the full 48-month term. Thus, as drafted, it is not possible in practical effect to grant early completion status because it is improbable an Apprentice would complete 8,000 hours of OJT in the standard

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48-month term of the apprenticeship. Thus, as drafted, the Standards presently inhibit the JATC in recognizing demonstrated satisfactory training or unusual proficiency as a Stationary Engineer.

The Applicant submits this amendment is consistent with NAC 610.250(2), which grants to a JATC the discretion to “reduce the term of an apprenticeship if the apprentice has had satisfactory training or is unusually proficient at the trade.” Granting a conditional certificate would give participating employers flexibility in conditionally offering full-time, permanent journey-level employment to an Apprentice who has shown satisfactory training or unusual proficiency in the trade, conditioned on final completion of the apprenticeship by achieving what remains of 1,000 hours of work and 6 months in the Apprenticeship Program. This is expected to promote stability in employment in the transition from apprenticeship to journey-level work, which is valuable to all interested parties in the JATC.

The remaining redlined changes are non-substantive and clerical in nature. The Table of Contents is updated for page numbers and a section heading is updated to conform to the text. The Definition of “Registration Agency” in the Definitions section is updated to conform to a change in law since the Standards were last approved in 2020, which transferred jurisdiction of the NSAC from the Governor’s Office of Workforce Innovations (OWINN) to the Office of the Labor Commissioner. Section II.I. is updated to conform to the current contact information for the NSAC, EEOC and NERC. Sections XXII and XXV are updated to reflect the transfer of jurisdiction of the NSAC to the Office of the Labor Commissioner and to conform to current contact information, as applicable. Finally, Attachment A, Section 4.2 is updated to correct a clerical spelling error.

No changes are made to Attachments B and C.

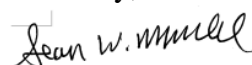
A clean copy incorporating all of the redlined changes summarized above, signed by the authorized officers of the Board of Trustees, is also attached should the Council approve the Standards as submitted.

Finally, a current Form 5910 is included.

If additional submissions are required by NSAC to process these revised Standards, please contact this office prior to any scheduled hearing for their review.

I plan to appear at the NSAC meeting with an authorized representative of the JATC. Please contact me directly if you have any questions or further instructions.

Sincerely,



Sean W. McDonald

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Attachments: (1) Redlined Standards, (2) Clean Copy Revised Standards, (3) 5910 Form

cc: Mr. Thomas O’Mahar
Mr. Anthony Williams
Ms. Denise Vukojevich, Training Director