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Via Electronic Mail

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Chapter 8 LTP Feedback

The Mid-America Carpenters Regional Council (“MACRC”) represents over 50,000 working men and women in Illinois, Missouri, Kansas and Eastern Iowa. The MACRC provides the construction and maintenance industries with productive, competitive and certified professionals, encompassing a wide variety of crafts and skills. The MACRC is strongly focused on emerging renewable energy developments, including solar projects. We have members working on solar developments throughout Illinois, Missouri, Kansas and eastern Iowa. Our Carpenters possess superior training and the skills necessary to safely and efficiently perform the assigned solar work. They perform multi-craft tasks on a wide range of solar projects from residential, commercial/industrial rooftops and ground mount, community and utility scale solar systems throughout Illinois. Tasks that include the installation of piles, ground or roof mounts, ballasted, fixed, single, dual-axis mechanical tilting, or canopy racking assemblies, all fasteners and connecting hardware along with the photovoltaics modules in their entirety.

Our Apprentice Training Program combines hands-on classroom education by qualified instructors with on-the-job training. This “earn while you learn” approach gives individuals the opportunity to earn a good living while developing highly marketable skills for their career. We have numerous specialized carpenter training programs that have been approved by the USDOL Office of Apprenticeship, and are North American Board Certified Energy Practitioners (“NABCEP”) approved training programs. As such, MACRC submits the following feedback on **TOPIC 5: Eligible Job Trainees and Job Training Requirements**.

Questions Presented:

1. Is a curriculum resulting in NABCEP Board Certification necessary for sufficient preparation for the kinds of work assigned to ILSFA job trainees?

MACRC believes the NABCEP Board Certification alone could be sufficient for the kind of work assigned to ILSFA job trainees to the extent they are performing work consistent with the PV Associate training. MACRC believe these individuals would be better served if they were provided a more holistic training that could provide them more career opportunities

and make them more capable and adaptable to perform work on a solar job site that is not limited to the NABCEP PV Associate.

2. Should a NABCEP Associated Credential training option alone be a sufficient curriculum to qualify an Other Qualifying Program? If so, should 100% of classroom requirements completion be required, compared to the 50% or more classroom completion requirements for existing options, detailed above?

As mentioned above, MACRC believes job trainees will be better served where other types of training/certifications are accepted beyond NABCEP. For example, MACRC members currently perform work on solar projects not related to electrical work, such as installation of solar racking assemblies and solar modules based on training received in MACRC's USDOL Office of Apprenticeship and NABCEP approved apprenticeship programs. MACRC further believes classroom time is important to this type of job training, but stresses that the on-the-job training our members receive has proven to be invaluable in their training experience. Dealing with this type of equipment on the job is significantly different than learning about such in a classroom environment. Therefore, any training option allowed should require learning that occurs outside the classroom.

3. Should a waiver option be made available for Approved Vendors to extend the cycle of a job trainee by an additional (1) year after the initial 2-year cycle in order to comply with the job training requirements?

The MACRC apprenticeship programs tend to be 4 years in length, which means that job trainees are both learning and working for their first four years. As such, Approved Vendors should be able to seek waivers for the total time an Eligible Job Trainee is active in an apprenticeship program. To disallow such would disincentive Approved Vendors from using apprentices altogether.

4. Should the waiver described above be limited to smaller Approved Vendors with less than 50 employees? Allowing smaller Approved Vendors to retain their current workforce from FEJA or OQP programs without having to let job trainees go. Are there any other recommendations for limits to a waiver?

As stated above, waivers should not be limited to any term shorter than the duration of an USDOL certified apprenticeship program and should be made available to Approved Vendors at any size.

Thank you for your consideration of our feedback.

Sincerely,
Anthony Janowski LEED BD+C
Director of Business Development