

TOPIC 5: Eligible Job Trainees and Job Training Requirements

Background

The ILSFA program requires that Approved Vendors utilize Eligible Job Trainees from qualified job training programs. Eligible Job Trainees can come from one of two types of Qualified Job Training Programs: Public Act 102-0662 (colloquially known as “CEJA”) and Public Act 99-0906 (colloquially known as “FEJA”) Workforce Development Programs, or Other Qualifying Programs (“OQPs”). ILSFA Approved Vendors may also hire eligible trainees from an Other Qualifying Program (OQP), so long as they can demonstrate that completion of the job training program would lead to the eligible trainee becoming a Qualified Person under the [83 Ill. Adm. Code 468.20](#). Eligible Job Trainees are currently considered Eligible Job Trainees by completing CEJA or FEJA job training programs within the past 36 months or completing 50 percent of classroom requirements of an OQP in the past 24 months.

Following [83 Ill. Adm. Code § 468.20](#), students of an OQP must complete at least 50 percent of classroom requirements of one of the following to be considered an Eligible Job Trainee:

- An apprenticeship as a journeyman electrician from a DOL registered electrical apprenticeship and training program
- A North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program
- An Underwriters Laboratories (UL) distributed generation technology certification program;
- An Electronics Technicians Association (ETA) distributed generation technology certification; program;
- An associate degree in applied science from an Illinois Community College Board approved community college program in the appropriate distributed generation technology.

The Agency is specifically interested in reviewing the second bullet point “A North American Board of Certified Energy Practitioners (NABCEP) distributed generation technology certification program” which is ambiguous on what NABCEP training and/or certifications can be used to achieve a Qualified Person status (or coursework approval for an OQP) since NABCEP does not list this exact certificate title within their [Certifications](#).

ILSFA has received multiple OQP applications that indicate that the graduates of those OQPs will receive the NABCEP PV Associate Credential. The NABCEP PV Associate Credential is separate from the Board Certifications offered through NABCEP. The NABCEP PV Associate Credential is described as a Program that “recognizes individuals who have demonstrated knowledge of the fundamental principles of the application, design, installation, and operation of Photovoltaic, Solar Heating or Small Wind energy systems.” Additionally, NABCEP notes that “passing a NABCEP Associate exam qualifies an individual to design, sell, install, or maintain systems in a supervised capacity,” for more information about the NABCEP PV Associate Credential visit: <https://www.nabcep.org/certifications/associate-program/>

The Agency believes that the NABCEP PV Associate Credential may similarly reflect the skill sets of FEJA job training programs, which prepare job trainees for entry level positions in the solar industry, but seeks further public comment.

Additionally, ILSFA Approved Vendors have reported to ILSFA that the cycling of job trainees from OQPs after a 24-month period places a burden on Approved Vendors to release those job trainees from employment instead of maintaining them on staff, especially amongst smaller businesses.

Questions

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

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?

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?

Yes, in fact, we would argue that the 2-year cycle encourages employee turnover and seems to go directly against the spirit of the Job Training Programs. Having employees essentially “age out” of their qualifications could lead many companies to see these employees as only having a 2-year lifespan. If a company is unable to expand their workforce over time, and must remain with the same head count, that company is put into a difficult situation where they must either fire/re-locate those employees or cut down on their participation within the program to ensure they’re still meeting compliance.

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?

No, we do not believe this should be limited to smaller Approved Vendors. Though larger Approved Vendors may have more resources to expand their workforce over time, this is not a guarantee. As with any other business, the needs of the company can ebb and flow, especially during the winter months. With fewer installs during those months, there are fewer hours to spread among employees, so retention and hiring can also be low in tandem. If an employee’s 2-year timeline ends in September, it would be unreasonable to expect even a larger Approved Vendor to hire new employees to cover that qualification need as this would take the already

slim hours away from other employees or would force the Approved Vendor to make cuts and rehire in order to satiate the qualification needs during that time.

We also recommend waivers in instances of location. There is inconsistency with the availability of Job Training Programs in certain, more rural, areas of Illinois which leads to difficulties in staffing branches in those areas with the necessary trainees, and with being able to fulfill the installation work in those areas while meeting requirements. It is also unreasonable to expect the current available Job Trainees to travel multiple hours to a job site that is in one of these more rural areas just so they can meet an expected quota. This can be especially difficult considering that a large number of ILSFA-eligible projects tend to exist in the areas where these Job Training Programs do not.