

To the State Apprenticeship Council

Hello,

I want to start my prepared statement with the Department of Labor's definition of a hybrid/competent based program, A hybrid approach which requires the apprentice to complete a specified minimum number of on-the-job-learning hours and RTI hours to demonstrate competency in the defined subject areas.

The Carpenters definition of Hybrid, An occupation using an apprenticeship approach that measures the individual apprentice's skill acquisition through a combination of a specified minimum number of hours of on-the-job learning and the successful demonstration of competency as described in a work process schedule.

They are proposing offering an apprentice the ability to complete their programs in 2 ½ years to 4 years but do not give any written pathways in the standards on how each part of competency will be documented to show achievement. The standards do not really spell out how they will decide who completes in 5400 hours vs who meets the competency in 8000 hours. They have not included in any of these proposed standards how they will demonstrate the written, and hands-on proficiency measurements other than the vague promise of "The sponsor will monitor and document the apprentice's progress in the OJT and related instruction classes."

I would like to also address the short amounts of RSL and OJT time the proposed program states they will be able to train the apprentice to achieve proficiency in different parts of the trades. For example, they are proposing 100 hours RSL and 1000 OJT for the training to journey person level the following tasks in Floor Covering, Substrate Awareness, Patching and leveling (no mention of any training on floor preparation products), carpet Layout, Seam Cutting methods, Hot Melt Seaming, Stretch-in Carpet, Pattern Matching, Sheet Layout, Heat welding, Seam cutting (yes they listed it twice), Heat Welding, Jobsite check Procedures, Making Scale drawings, and Substrate Preparation.

In the Drywall Finishing standards, they do not show how much minimum RSL and OJT time will be required for each competency on the only page that lists the competencies needed to complete.

Thank you for your time on this matter.