

MEMORANDUM

TO: Kent Carlson and Michael Wishnie, Co-Chairs, Task Force to Study the Use of
MOS Specialty Training as a Substitute for State Licensing Requirements
FROM: Law Student Interns, Veterans Legal Services Clinic, Yale Law School
DATE: November 1, 2013
RE: Licensing Requirements for Electricians in Connecticut

I. Recommendations

- DCP should promulgate a regulation stating that veterans with sufficient electrical training are exempt from the electricians' qualifying exam, or the Connecticut Legislature should amend CONN. GEN. STAT. § 20-333 (2011) to require DCP to recognize military training when issuing electricians' licenses.
- Veterans should receive the appropriate electrical license upon presentation of a DD-214 or another DoD form documenting relevant military experience.
- DCP should implement a fee waiver for veterans with electrical skills who are applying to become licensed electrical journeypersons or contractors.

II. Relevance to the Task Force

The licensing of electricians is ripe for Task Force review. According to the most recent report prepared for Iraq and Afghanistan Veterans of America (IAVA) by the Veterans Legal Services Clinic (VLSC) at Yale Law School,¹ electricians in Connecticut have a median annual income of \$55,700, which is higher than the national median of \$49,800. In Connecticut, the projected job growth in this industry is 15% over the next decade. The comparable national projection is 23% over the same period. The IAVA report estimates that there are 270 annual openings for electricians in Connecticut. In comparison to other occupations, such as HVAC Mechanics (140) and Telecommunications Equipment Installers (60), this number is high.

In terms of applicability to military training, the IAVA report lists electrician as an occupation relevant to both the Navy and the Air Force. According to that report, electrician is the 17th most relevant occupation for Navy veterans and the 5th most relevant occupation for Air Force veterans. Thus, there is likely to be overlap with a number of different military occupational specialties (MOS).

¹ The Veterans Legal Services Clinic (VLSC) at Yale Law School drafted a report on veterans' employment for IAVA in October 2013. The draft report, which is titled *Transitioning Troops: Aiding Gulf War II Veterans in the Passage from War to the Workplace*, contains statistics on military occupational specialties and the Connecticut labor market. Copies were distributed to the Task Force at the first meeting. Please contact the VLSC law student interns if you would like another copy or more information: matthew.blumenthal@clinics.yale.edu; emma.kaufman@clinics.yale.edu; ryan.podolsky@clinics.yale.edu.

III. Licensing Requirements

There are two general categories of electrical licenses in Connecticut: (1) electrical contractors, who may work independently and employ other electricians and (2) electrical journeypersons, who may only work in the employ of a licensed electrical contractor. Both categories of electrical licenses are regulated by the Connecticut Department of Consumer Protection (DCP), and specifically, by an Electrical Work Examining Board within the DCP. The DCP is empowered by statute to issue electrical licenses with the consent of the Commissioner of Consumer Protection. CONN. GEN. STAT. § 20-333 (2011). The relevant statutory requirements for electrical licenses are that the applicant must: (1) be 18 years of age; (2) be of good moral character; (3) possess an eighth grade diploma or have the equivalent required skills for the trade. *Id.* Beyond those requirements, much of this licensing scheme is regulatory.

The process for obtaining an electrical license depends on what type of electrical work the applicant wants to conduct. There are five general types of electrical licenses in Connecticut:

1. Limited Electrical (C-5, C-6 licenses): limited to low-voltage, alarm, or signal work, audio and sound systems, and telephone-interconnect systems
2. Unlimited Electrical (E-1, E-2 licenses): permitted to do all electrical work as defined by statute, including installing and repairing and wire or cable. CONN. GEN. STAT. § 20-330(2) (2011).
3. Electrical Lines (L-1, L-2 licenses): limited to work on line construction, installation and maintenance
4. Limited Electrical (L-5, L-6 licenses): limited to low voltage not including telephone-interconnect systems
5. Limited Electrical (T-1, T-2 licenses): limited to telephone-interconnect systems

Within each of these five types of licenses, there is one specific license for a contractor (the lower numbered license) and one for a journeyperson (the higher numbered license).

In general, the requirement to become a licensed contractor in any of these five categories is two years of experience as a journeyperson or six years of equivalent experience and training. To become a licensed journeyperson in each category, an applicant needs to complete either a registered apprenticeship program or four years of equivalent experience and training. To become a fully licensed independent electrician, you would thus typically progress through an apprenticeship program to a journeyperson license to a contractor license. However, there are clear opportunities to credit equivalent experience throughout that occupational track.

The apprenticeship program for electricians, which often the first step in the licensing process, is regulated by the Connecticut Department of Labor (DOL) and is governed by a separate statute. CONN. GEN. STAT. § 31-22 (2013). To become an electrical apprentice, a potential electrician must register with the DOL, which is typically done through the apprentice's sponsor. The apprentice and her sponsor then draft an agreement regarding the on-site and classroom instruction that the apprenticeship will entail. That agreement—which is essentially a private contract—is submitted for approval to the Chair of the Connecticut Apprenticeship Council, which sits within the DOL. The Apprenticeship Council is empowered by statute to promulgate regulations regarding the minimum standards for each apprenticeship. CONN. GEN. STAT. § 31-32(0) (2013). Once the Council approves an apprenticeship contract, the apprentice is issued an apprentice ID card. At the end of the apprenticeship period, the sponsor notifies the DOL via a form (AT-22) and the DOL sends the apprentice a certificate of completion.

The process for obtaining an electrician's license is straightforward after that point. Pursuant to DCP regulations, to become a licensed electrician, a person must submit a notarized application to PSI Licensure, a Las Vegas-based company that has a contract with DCP to administer the Connecticut electrical licensing exam. The application consists of a cover form, a fee (\$150 for contractors; \$90 for journeypersons), and several additional documents. For potential contractors, those documents include a photocopy of the applicant's current journeyperson license and proof that he has held the license for the required two-year period. For potential journeypersons, the required document is a copy of the certificate of apprenticeship completion from the DOL.

Once the applicant has submitted those documents by mail, she receives an eligibility postcard from PSI Licensure, which tells her which exam she has qualified to take. The applicant then registers for the exam, which is offered at a number of different locations in Connecticut. Depending on her score, she will qualify for one of the five types of electrical licenses. To finally obtain the license, the applicant must submit a copy of her score report to the DCP.

In sum, the process for obtaining an electrical license involves an apprenticeship or other training period of several years and an in-person exam.

IV. Analysis

This licensing process is largely discretionary. The Department of Consumer Protection is permitted by statute to recognize equivalent training and experience when issuing electrical licenses. According to the brochure published by PSI Licensure, when applying to take the electrical exam, a person may submit notarized statements from any occupational related employers testifying to the dates of employment and the degree of related education obtained therein. These statements can be submitted in place of otherwise required application documents, and they may enable an applicant to test for a more advanced electrician's license. If the application for recognition of previous occupational training is denied, DCP sends the applicant a "deficiency letter" with further directions.

This flexible process provides ample room to streamline licensing to credit military experience. The quickest reform would be to have the DCP accept certain MOS ratings in place of letters from military employers regarding previous electrical training experience. The Task Force could also consider fee waivers, and even a complete waiver of the electrician's exam score upon presentation of a DD-214. This would be a simple and effective way to channel veterans with electrical skills into a growing segment of the Connecticut labor market.