



Associated Builders and Contractors of Massachusetts  
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**VIA ELECTRONIC MAIL** ([Peter.B.Kelly@state.ma.us](mailto:Peter.B.Kelly@state.ma.us))

Peter B. Kelly, Executive Director  
Board of State Examiners of Sheet Metal Workers  
1000 Washington Street, Suite 710  
Boston, Massachusetts 02118-6100

Dear Executive Director Kelly & Members of the Board:

On behalf of Associated Builders and Contractors of Massachusetts (ABC) and its 400 member companies employing over 20,000 men and women across the Commonwealth, I wish to register our written comments in regard to the Board of State Examiners of Sheet Metal Workers (hereinafter the "Board") regulatory review being considered and conducted pursuant to Executive Order 562. After consultation with our membership and discussions amongst leaders in the sheet metal trade, we believe addressing the following issues will better serve the sheet metal industry and accomplish Governor Baker's intent to reduce unnecessary costs, burdens and complexity imposed by existing regulations.

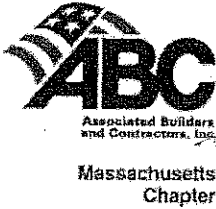
The Commonwealth's sheet metal industry is experiencing a labor crisis resulting from illogical apprentice-to-supervisor ratios, excessive and outdated training, inconsistent application procedures and fee amounts at the local level, and a general inability to expeditiously license otherwise qualified tradesmen and women.

#### **Apprentice-to-Supervisor Ratio**

A significant barrier towards expanding the sheet metal workforce is to reexamine the apprentice-to-supervisor ratio. 237 CMR 5.02(2f) establishes that the apprentice-to-supervisor ratio is in effect 3 to 1 for commercial projects. This overloading on supervisors creates a negative and potentially hazardous effect resulting in a single apprentice reporting to several supervisors at one time. It also unnecessarily limits the amount of apprentices that could otherwise safely learn on the job. A standard ratio of one-to-one is the most effective option. This would provide a cost-efficient and safe option by authorizing each apprentice to be supervised by one designated supervisor, creating a mentorship in the process.

#### **Consistency in Licensing Requirements and Fees at the Local Level**

The Board of State Examiners of Sheet Metal Workers was established as a state-wide board with the directive to regulate the sheet metal industry throughout Massachusetts in a way that would provide consistency and predictability. The unrestricted delegation of fee amounts, application standards, and inspection procedures for private building projects to local authorities have created volatility and arbitrary application of the requirements throughout the industry. A permit in one town can differ by tens of thousands of dollars from the same job in another. The Board should encourage consistent fees, application standards, and inspection procedures by



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recommending reasonable parameters to cities and towns to ensure predictability and stability in the sheet metal industry throughout the Commonwealth.

### **Out-of-State Workers**

Currently, as it applies to licensing sheet metal workers, there are no established standards or reciprocity with any neighboring states. The ability to bring in qualified and experienced sheet metal workers from surrounding states to address the labor void is essential to the growth of the sheet metal industry. Although the Board has the discretion to waive the educational or work hour requirements, this should be codified into the regulations for a standardized approach. It is imperative to open the Commonwealth's sheet metal workforce to willing and capable out-of-state workers without requiring them to go through the entire licensing process.

### **Length of Training**

The current length and structure of apprenticeship training is ineffective with today's workforce. The five year apprenticeship training period, as it is currently established, has a prohibitive effect which redirects potential young sheet metal workers towards alternate fields of work. The amount of training hours required to become a qualified sheet metal worker is excessive and there needs to be alternative methods to achieve the educational requirements. With advances in technology and training, online and accelerated programs would attract able, young professionals.

There should also be an emphasis on accepting more vocational school work hours towards the educational requirements. Vocational schools are beginning to rebound as a cost-effective alternative to expensive secondary institutions that will provide secure employment with a steady stream of income immediately upon graduation. Accepting more vocational classroom hours toward apprenticeship training would entice young workers to enter the sheet metal trade and begin to replenish the thinning workforce.

Addressing the aforementioned issues would provide opportunities for existing qualified sheet metal workers and young individuals to enter or re-enter the Commonwealth's sheet metal workforce. I appreciate the opportunity to submit these comments in regard to the Board of State Examiners of Sheet Metal Workers regulatory review being considered and conducted pursuant to Executed Order 562. Should the Board have any questions regarding these recommendations please do not hesitate to contact our office. Thank you for your time and consideration of this matter.



Massachusetts  
Chapter

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Sincerely,

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