



June 15, 2015

Donald Jansen
Board of State Examiners of Electricians
1000 Washington Street, Suite 710
Boston, MA 02118

Dear Mr. Jansen,

The Massachusetts Electrical Contractors Association (MECA) represents over 325 electrical contractors and their employees. MECA would like to respond to Governor Baker's Executive Order 562 as it pertains to 237 CMR. We thank you and the Board of State Examiners of Electricians for the opportunity to express changes we would like to see in 237 CMR.

237 CMR 13.09

MECA would like to see the changes in red below to 237 CMR 13.09. We are of the opinion that education is not something that expires at all but are willing to compromise with other industry stakeholders and ask that the BSEE consider extending the sunset on education experience. Many times there are extenuating circumstances as to why one may not have entered the trade or been able to complete their education.

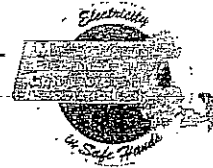
(2) Education Expiration.

(a) Applicants who completed their education more than ~~twelve~~ years prior to the effective date of the current Code shall not be given credit for that education, but will be required to successfully complete the minimum required clock hours of education for licensure as provided in 237 CMR 13.00, as applicable, before making an application for examination.

(b) Applicants who completed their education more than ~~nine~~ years but within ~~twelve~~ years prior to the effective date of the current Code shall only be given partial credit for that education and will be required to successfully complete 50% of the required clock hours of education as provided in 237 CMR 13.00, as applicable, before making an application for examination.

(c) Applicants where not less than 50% of the required clock hours of the required education was completed within ~~nine~~ years of the effective date of the current Code shall be considered as current and no additional education requirements are required.

(d) When the examination item bank has changed to reflect a newly promulgated Code, candidates whose education was successfully completed prior to the promulgation of that Code will be required to successfully complete a 15 hour Continuing Education Program as provided in 237 CMR 17.00 on the currently adopted Code incorporating the Massachusetts Amendments before he or she can sit for examination.



237 CMR 17.01

MECA is of the opinion that the way the current language is written as it pertains to the six hours of professional development is not being enforced as it is written in the 237 CMR 17.01. Board staff has imposed limitations on what topics may be chosen, how often and in what manner. We would recommend that the BSEE take a hard look at the language as it is written. The CMR's do not allow for such limitations and expressly states "six (hours) may be in areas chosen by the licensee...".

(1) Continuing Education Requirement.

(a) Except as otherwise provided in 237 CMR 17.01, each licensee of the Board, as a condition for license renewal, shall present evidence satisfactory to the Board that in the three year period before license renewal he or she has completed 21 clock hours of continuing education. Of the required 21 clock hours, 15 clock hours shall be on topics related to the Massachusetts Electrical Code, business, law and related topics with a provider in area of study approved by the Board and ~~six may be in a areas chosen by the licensee for professional development in the subjects of Electrical Code, business, law, first aid, Safety and Building Code and related topics.~~ Notwithstanding the previous provisions of 237 CMR 17.01, Inspectors of Wires appointed pursuant to M.G.L. c. 166, § 32, electrical inspectors/ investigators employed by the Division of Professional Licensure and members of the Board shall complete the required 15 hours of mandatory continuing education within the first year of the release of the updated edition of the Massachusetts Electrical Code, 527 CMR 12.00 as a condition of license renewal. Effective for all licenses expiring on or after July 31, 2010, in addition to the required hours for renewal as provided above each Inspector of Wires appointed pursuant to the provisions of M.G.L. c. 166, s. 32 shall complete in each license cycle 12 hours of continuing education in courses approved by the Board. For purposes of the immediately preceding sentence, the required 12 hours of continuing education shall be completed in a continuing education program sponsored by an association of Inspectors of Wires recognized by the Board and instructed by Board approved providers of continuing education.