

Industry Concerns:

In preparation for our August 9, 2022 meeting with Commissioner D’Emilia

1) Apprentice registration delays:

ISSUE: Applicants for apprenticeship wait for months to receive an apprentice registration.

- a) How long does it take to accept and review and approve a “completed” application?
- b) How many applications are received... per week, per month, etc.?
- c) Follow up notification is unclear for “incomplete” applications or delayed approval?
- d) Extensive delays aid and abet unlicensed practice and create employment hardships.

2) Licensing exam delays:

ISSUE: Licensee applicants for advancement experience delays scheduling the exam.

- a) How long does it take to review and approve an exam application?
- b) How many exam applications are processed weekly, monthly, etc.?
- c) There are concerns with the exam provider... PSI?
ie: no-show proctor, extended wait times, limited test venues and test date availability
- d) Delayed license progression causes business challenges and economic hardship.

3) Office Staffing and Procedures:

ISSUE: Industry experiences difficulty communicating with and receiving service from the Board of Examiners Office.

- a) Why has there been frequent recent turn over of the Executive Director?
- b) Why has there been departure and relocation of experienced staff?
- c) The Plumbing Board office requires specific tasks (not common with other Boards), is there enough staff to accomplish the workload duties in a timely manner?
- d) Variances, Product Acceptance, Curriculum review and approval, Special Permission, code inquiries, and licensing are some of the unique tasks that need specialized attention.

4) Technical support:

ISSUE: Insufficient licensed plumbing experienced staff to support the profession.

- a) Out of date code questions and inaccurate exam content... need review and updating!
- b) State Inspectors excluded from Board meetings, leads to information voids.
- c) Information needs timely updating on the “Plumbing Board” website page.
- d) Product and Code related questions from contractors, licensees, and inspectors.

5) Code:

ISSUE: Excessive time to review and update and approve plumbing / gas code changes.

- a) Pending (April) code revisions need action to promulgate without unwarranted delay!
- b) 248 CMR is a robust, quality, concise, locally maintained, and appropriate code for the Commonwealth which is beneficial to the consumer, both residential and business, the licensees, both experienced and new incoming, and the entire industry.
- c) MA Plumbing code coordinates with NFPA gas code, MWRA water/sewer, DEP water quality, DPS boiler laws, DPH health regs, and other Commonwealth of Massachusetts Regulations (CMR).
- d) 248 CMR is well established as a premiere code, updating is essential compared to considering a replacement which would impose excessive cost and extensive re-training.