



February 19, 2025

The Honorable Pamela Beidle, Chair  
The Honorable Antonio Hayes, Vice Chair  
Senate Finance Committee  
3 East Miller Senate Office Building  
Annapolis, Maryland 21401

**Testimony of Ray Baker, Maryland Director, Baltimore DC Metro Building Trades Council on  
SB 431: Registered Apprenticeship Investments for a Stronger Economy (RAISE) Act  
Position: FAVORABLE WITH AMENDMENTS**

Thank you Chair Beidle, Vice Chair Hayes, and Members of the Senate Finance Committee for the opportunity to offer testimony on SB 431. My name is Ray Baker. I am the Maryland Director of the Baltimore-DC Building Trades (BDCBT). The BDCBT's 28 affiliates represent more than 30,000 union construction workers across Maryland, Virginia, and the District of Columbia.

The BDCBT supports SB 431 with amendments. We met last week with staff from the Governor's office and the Maryland Department of Labor. The BDCBT shared its concerns about the bill as introduced and the amendments that are important to us.

**1. The bill eliminates the licensing exam for individuals who successfully complete a registered plumbing apprenticeship program. We urged that this be removed from the bill: p2, lines 32-36 and p3, lines 1-19.**

- The exam is critical to consumer protection and public safety. Passing the exam demonstrates that a plumber has reached a recognized level of competency. The exam tests plumbers' knowledge of plumbing codes, practices, and safety procedures, ensuring they are qualified to perform various plumbing tasks. By ensuring competency through the exam, the license protects consumers by guaranteeing plumbers meet minimum standards. According to Maryland Code of Regulations, Sec. 09.20.02.03, Examination for Journey Plumber Certificates, the passing grade of 70 is necessary to pass the exam.
- This exam acts as an important consumer protection filter: according to the August 15, 2024 minutes of the Maryland State Board of Plumbing, most recent data available on the Maryland Department of Labor website, between January 2024 and August 15 2024, "400 plumbing candidates were tested, 157 candidates passed, 243 failed for a pass rate of 39%. Since the inception of the test, 11,575 candidates were tested, 4,197 candidates passed, 7,378 failed, for a pass rate of 36%."

**2. The bill authorizes a deviation from one-to-one journey worker to apprentice ratio for occupations designated by the Maryland Secretary of Labor as "nonhazardous to workers and members of the public." The bill also permits DOL to "consider formal written deviation requests from all other occupations" seeking a journey worker to apprentice ratio other than the required one to one ratio. We urged that these be removed from the bill: p3 lines 31-32 and p4 lines 1-7.**

- This is a slippery slope and opens the door for diluting the skilled trades that comprise the construction industry and increasing the potential for construction workplace safety hazards. The key distinction between an apprentice and a journeyman lies in their levels of expertise and responsibilities. Apprentices are entry-level individuals undergoing a formal training program to learn a skilled trade. They work under the supervision of a

seasoned professional, gaining hands-on experience and theoretical knowledge. Apprenticeships are structured and serve as a pathway to mastery in a specific trade. Journey workers have completed their apprenticeships, attaining a higher level of proficiency and qualification. Journey workers possess the skills and knowledge necessary to work independently in their trade. The journey worker stage represents a significant milestone in a construction professional's career, signifying a higher level of competency and autonomy.

- The bill does not define what is considered nonhazardous, nor does the bill provide any guidance to determine whether a particular occupation is hazardous or nonhazardous. The BDCBT is concerned about leaving such a wide latitude of discretion to the Secretary of Labor. The BDCBT is aware of the Maryland Department of Labor Memo "SB511/Ch.307, 2024 HB 650/Ch. 308, 2024 - Final report on analyzing the apprenticeship mentoring ratios for all nontraditional apprenticeable occupations in the State," sent to Senate President Ferguson and House Speaker Jones. The list memo provides a list of 135 "nontraditional" occupations that could operate with a mentorship higher than one-to-one without posing a risk to the safety of workers in the workplace. It is unclear whether MDOL anticipates relying on this list. Further, the list includes occupation categories no longer in use, such as refrigeration mechanic, and occupations that could be dangerous to the public, such as emergency medical technician/paramedic.

3. **The bill creates "qualified intermediaries" as part of the Registered Apprenticeship Incentive Program. We believe this program could benefit from additional considerations, outlined below:**

- Strengthen the reporting to the General Assembly: On p5, after line 10, the following should be added: (V) any corrective actions, including the requiring of reimbursement of incentives, for failure to meet the requirements of the Registered Apprenticeship Incentive Program.
- Require "qualified intermediaries" to be "Maryland-based" entities on p7 line 19 to support local based businesses and not out-of-state businesses.
- Prohibit "qualified intermediaries" from also being sponsors to avoid conflicts of interest.
- Determine whether a new "Office of Registered Apprenticeship Development" is necessary to support the new program, or whether existing staff is sufficient.

The BDCBT urges a favorable report with amendments on SB 431.

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