

**Background:**

At its March 4, 2008 meeting, the Board of Boiler Rules moved proposed continuing education rules forward for public hearing. As part of the process of collecting comments on the proposed rules, the division sent an e-mail survey to boiler and pressure vessel licensees asking their opinion on the appropriate level of continuing education for their particular license types. The Plumbers and Steamfitters, Local 290 and the Oregon Association of Plumbing, Heating and Cooling Contractors (OAPHCC) were also asked to e-mail the survey to members. Plumbers and Steamfitters, Local 290 does not have e-mail addresses for its members, but OAPHCC was able to send out surveys to its members. The non-scientific survey results are listed below, along with a selection of comments from survey participants.

**Discussion:**

**Licensees were asked what amount of continuing education they thought was appropriate for their license type: 24 hours per 3-year cycle (the existing requirements); or, 16, 8, or 4 hours per 3-year cycle. Some respondents provided a different number of hours, and many also provided comments.**

For Class 2 licensees:

- 4 licensees thought that **four hours** per 3-year licensing cycle was appropriate
- 5 licensees thought that **eight hours** per 3-year licensing cycle was appropriate
- 3 licensees thought that **sixteen hours** per 3-year licensing cycle was appropriate

For Class 3 licensees:

- 4 licensees thought that **four hours** per 3-year licensing cycle was appropriate
- 9 licensees thought that **eight hours** per 3-year licensing cycle was appropriate
- 3 licensees thought that **sixteen hours** per 3-year licensing cycle was appropriate
- 5 licensees thought that **twenty-four hours** per 3-year licensing cycle was appropriate

For Class 4 licensees:

- 1 licensee thought that **zero hours** per 3-year licensing cycle was appropriate
- 1 licensees thought that **four hours** per 3-year licensing cycle was appropriate
- 4 licensees thought that **eight hours** per 3-year licensing cycle was appropriate
- 3 licensees thought that **twenty-four hours** per 3-year licensing cycle was appropriate

For Class 5 licensees:

- 24 licensees thought that **four hours** per 3-year licensing cycle was appropriate
- 24 licensees thought that **eight hours** per 3-year licensing cycle was appropriate
- 18 licensees thought that **twelve hours** per 3-year cycle was appropriate
- 24 licensees thought that **sixteen hours** per 3-year licensing cycle was appropriate
- 62 licensees thought that **twenty-four hours** per 3-year licensing cycle was appropriate

There were no responses from Class 5A licensees.

For Class 5B licensees:



1 licensees thought that **eight hours** per 3-year licensing cycle was appropriate

### Some Comments Received:

*"I was an instructor for CEU's on Class 2,3,4,5 Licenses. I feel 8 hours is plenty in a 3-year period. The Boiler industry does not change that much. I was teaching things that made the class boring to the class, just to fulfill the 8 hour a year requirement. The topics for teaching the boiler license are so tight you can only discuss ASME codes and ORS & OAR. You can discuss this in 24 hour CEU in a 3 year period, but you lose half of the teaching because it is over the head of the mechanics and they are not even tuned in. Other topics should be allowed, such as: Confined Space, Basic Electricity, Water Treatment, Quality Control manuals, EPA Boiler Emission requirements, boiler burner tune-ups and trouble-shooting, NFPA 8501 for boilers over 12 million BTU. NFPA 54 gas piping to boilers, system designs, and gas trains. This to me would justify 8 hours a year. But not just for ASME, ORS and OAR. 90% of these license holders are hands-on mechanics. They are very sharp at learning what they do in the field day to day. The ASME Engineering Code loses their interest. The final issue that this program has problems with is Class 2 license holders. It is not fair for them to sit in a class for 8 hours a year where they don't even know what a boiler is and pay \$75.00 for the class and listen to something they have nothing to do with. Class 2 people install CO2 and air tanks. These guys I feel sorry for in my classes."*

*"Hey thank you for your valuing my personal opinion on this. I feel that even if the schedule is changed there should be at least 8 hour of continued education per year in order to give this license some real credibility."*

*"I have always been of the opinion that the 8 hours CE per year is not adequate for continuation of the Class 5 license. We with that classification need to be as knowledgeable in our profession as plumbers and electricians who are required to do 24 CE hours per year. In fact, I believe the Public Safety connotations, knowledge base, and keeping up with industry changes is even more complex for a true Class 5. The idea of renewing on a three year cycle is fine, but the CE should still be based on equal hours per year not a one time cram course of 24 hours. In addition, for both plumbers and pipefitters the state should have specialty license endorsements and concurrent permitting/inspections for medical gas, fuel gases, liquid fuel, building service piping other than plumbing code covered systems, process piping, fire protection systems, refrigeration service technicians, and fuel burner/boiler service technicians, as these are not adequately covered by the Boiler or Plumbing programs."*

*"The only equipment I deal with which requires me to possess a Class 3 license would fall under the ASME definition of miniature, electrically heated boiler. Any of the CE classes offered have little value to my work. Any state rules and statutes that touch on our equipment could easily be covered in an hour. One year, just in order to get 8 hours CE to renew my license, I took an 8 hour course in pressure piping, which was totally irrelevant to my work. It had been mentioned earlier that if we were required to get 24 hours of CE over the 3 year period, that we would not be able to duplicate classes, for example three 8 hour classes on CSD-1. If this were the case, it would require me to take CE hours in areas that are meaningless to my work, just in order to satisfy the state requirement."*

*"I feel it should be 8 hrs every year, but why not make it an option for the license holder to choose every three years how he wants to facilitate his own continuing education. The real problem is if every three years becomes the norm, can the different instructors handle the amount of classes required during the last 3 months before licenses expire. Another issue is the size of the classrooms and with that size are they going to be controllable so some people can learn something. Also, I feel that the small shop owners or their key people that do 'O' and 'R' Stamps Certificates should be given some hours credit towards their individual license."*



*“Honestly I get tired of hearing the same thing over and over, 4 hours should be more than enough time to say what they have been saying.”*

*“MINIMUM OF 24 HOURS...”*

*“I feel the hours should remain the same...8 hours per year. The information that is covered is useful and re-visiting it keeps one "on top of their game".”*

*“Four hours! Being forced to expend energy and resources at my trade and not being compensated for it IS SLAVERY. And now other industries are inside our industry lobbying for more money in their pocket such as Construction Industry Training Council CITC They don't give a damn about us all they care about is how many people they can RAM through their program. All they care about is money. This is going to flood our industry and cause wages to fall causing industry, service, product having less buyers for their product. It's bad for the industry and bad for the community. Plus, all the non union companies are using non-licensed people to install all the boilers and piping. And you aren't doing anything about it but further burdening us. WHAT THE HECK!”*

*“A minimum of 8hrs. per year served at one year intervals. 24 Hrs. total.”*

*“I feel that 16 hours would be sufficient. I would prefer to see smaller presentation durations with the presenters being the actual inspectors who will speak best to the codes, updates and their interpretations of these requirements.”*

*‘THANK YOU FOR CONDUCTING A SURVEY OF LICENSE HOLDERS. IT CAN DO NOTHING BUT STRENGTHEN THE SYSTEM. I BELIEVE THAT THE 24HR REQUIREMENT IS GOOD.’*

*“I do not mind the way it is now. Just let me know what to do so I do not lose my license.”*

*“I do not see how the variety of classes support continuing education. On-line classes do not count for much as far as I am concerned.”*

*“Hello, in response to hour requirements to maintain boiler licenses. The state’s decisions on time lengths between renewals should not have any bearing on classroom hours to maintain a person’s license. The standard has been established and needs to be maintained at 8 hours per year. I can’t help but notice that your survey only includes the current standard or less or less or even less than that. While also noting that it does not inquire our opinions on decreasing the current license fees down to as low as less than 20 percent of the current rate.”*

*“I think 4 hours a year in continuing education would be plenty to keep us focused on safety issues and procedures needed to do this type of work. So my choice would be 12 credit hours over the 3 year period.”*

*“I would like to see the current requirement of 24 hours of continuing education per year stay as the rule. It is needed to keep up with current technology and code requirements as they change each and every year with the Code Addenda per ASME and the NBIC.”*

*“8 hrs code related and 16 hrs industry related continuing education hours would probably be pertinent. This is the way it is handled for my electrical license with the state and it appears to work well.”*

*“Eight hours of continuing education every 3 years because our codes have been set as standards and are rarely modified. I think that 8 hours per year is quite realistic for the continuing education requirements. It provides a good opportunity to keep abreast of changes in the industry and “relearn” some of the not-so-basics which are not used on a regular basis. I believe that 8 hours in three years would be sufficient training, unless important updates arise which could be mailed to card holders. The last two hours of the typical class are not so productive. The good stuff is always earlier, not because of the content, but rather the students. 8 hrs in behind a desk is way out of our range. Thank you for your interest.”*

*“I think four hours or less would be plenty of time for updates on pressure vessels and new laws. If possible, it would speed up the process if we could do the continuing education online.”*

*“Well, obviously I'm sure everyone wants to pick the least amount but I think that 8 hours every renewal (3 yrs) would be sufficient to keep people refreshed. The complaint for us Class 2 holders is that the classes never pertain to what we do.”*

*“Hello, I think four hours a year should be plenty, just to keep up with all the updates that came up through the year. And we should get written updates that we can keep in our files.”*

*“I am not going to renew. I do not have to have this license but have kept it just in case. I also hold electrical cards and am tired of giving up Saturdays for these classes. I contend this was all started as retirement opportunities for former chief inspectors whether it be Boiler or Electrical. I have found most classes to be boring and mostly worthless. I once asked an instructor if he had a conflict of interest teaching while on the boiler board. His reply, “ I'm not on the boiler board anymore. I'm on the electrical board”. Everyone that I talk to in the trades thinks this is all a big joke. Folks can't complain about it as their livelihood depends on licensing. I know what I say is meaningless in the world of big government, but I don't have to play if I don't want too.”*

*“I believe that 8 hrs per year is a minimum for holding a boiler license, if not more. I would like other courses and classes be eligible for credit. There are a select few distributors that would be able to provide said courses and would/shall be certified to provide said courses. I believe that continuing education is one of the must IMPORTANT aspects of having a license and the more the better for all.”*

*“Personally, I feel continuing education is a good thing, the current level of 8 hrs was brought about by the old boiler board members for 8 hrs per year. It was a good starting point. I learned a lot in 8 hrs. I honestly felt though that amount of time per day for continuing education is spent taking breaks and lunches. On line should be more realistic: close to 4 hours per year to keep us up to date on code changes. Safety is our primary concern as a operator or maintenance of a pressure vessel. After all to get the time and experience for this license to play with bombs, and that is what this license is, took a lot of time, and experience. I would personally like to see the state offer an on line continuing renewal class with the test on line. This could be done with just a link to National Boiler Code, and a link to Oregon boiler codes. If outside classes are needed then use an outside training facility like the current providers offer could be used. My recommendations are as follows: Reduce the number of hours if done online, keeping it pertinent to on-going code changes.”*

*“I believe there should be 8 hours of continuing education required for every 3-year cycle. I believe the continuing education is supposed to keep us up to date on code changes. Most code books are revised on a three year cycle and the yearly addendums do not have enough changes to warrant a class. So, one 8 hour class for the three years would be plenty of class time to keep up with the few code changes.”*

*“For most of us working in construction industry, I feel that the requirement of 8 hours per year is the best option. I also feel more enforcement of the license holders and their work, would be in the best interest of public safety.”*

*“I believe that 24 hours for 3- years is a fair amount. That is 8 hours a year to keep updated on the trade that makes us a living. This also brings us together to strengthen our trade in an experience trading environment. So 24 hours is good.”*

*“16 hours seems sufficient considering most the boiler code is more useful for service type work. The class needs to be broken up into sections pertaining to each individuals main area of expertise. Anyhow I think the 16 hours would work great.”*

*“I believe that the continuing education requirement should be removed. These people work in this business on a daily basis and to make them take additional training seems very redundant. I don't believe in the licensing process anyway, but have to comply.”*

*“I feel that the continuing education program should have a requirement for 24 hours accumulated over the three years and not 8 hours per year. This would allow someone to take a single course to cover a specific topic in detail to ensure licenses holders gain substantial knowledge on a subject.”*

*“I don't think that the 24 hours would be that bad, my one question is why can't we also use classes that relate to construction and safety as upgrades also. I was thinking like OSHA classes of 1st Aid/CPR or something along that line.”*

*“I feel that 4 hours or less would be enough. I would just need to learn about any new changes or updates that would affect the requirements of installing pressure vessels. It could also be an online course.”*

*“24 hours. Keep the quality of skill and safety at its highest.”*

***“AS YOU KNOW, IT IS NOT THE AMOUNT OF HOURS THAT IS IMPORTANT. IT IS THE QUALITY OF THE SUBJECT AND THE INSTRUCTOR. IF ALL BEING EQUAL, I THINK 8 HOURS PER YEAR IS FAIR.”***

*“In our industry, the classes offered that apply are very limited. We have taken the same class for five years. Since on-line classes have been available, that is the course of choice. But I foresee a repeat of information from year to year. Although it is informative, it is very repetitive and once every three years would cover the information without the burden. Rule change updates, mailed or emailed, would fill in on the off years.”*

*“After years of sitting in the required CE classes listening to instructors read from the code for 8 hours, I am happy to give you my opinion. I have found every class useless in my work. If the State of Oregon only wants Class 3 BSM's to know the code then ONE 4 HOUR CLASS every three years will be more than enough boredom for me.”*

*“I believe that four hours would be adequate for a class 2. Probably breaking that up into 2 hours one year and 2 another, with a total of two -2hr classes needed in three years. I suggest that to keep license holders up-to-date rather than going for such a long period without review of code. Currently the burden for a class 2 license encourages companies to try to avoid proper permitting because of the hassle and expense associated with a class 2 license. I'm sure your Continuing Ed vendors could throw together a simple online refresher class that would be "reasonable" in time and expense for class 2 licenses.”*



**918-030-0120**

**Licenses Requiring 24 Hours of Continuing Education**

(1) During each three-year license cycle, the following license holders are required to complete 24 hours of approved continuing education, including one code-change course if required by the appropriate board:

- (a) General Supervising Electrician;
- (b) Limited Supervising Electrician;
- (c) General Journeyman Electrician;
- (d) Journeyman Plumber;
- (e) Class 3 Boiler Building Service Mechanic;**
- (f) Class 4 Boiler Boilermaker;**
- (g) Class 5 Boiler Pressure-Piping Mechanic;**
- (h) Class 5A Boiler Process Piping Mechanic; and,**
- (i) Class 5B Boiler Refrigeration Piping Mechanic.**

~~(2) The following licenses transition to a three-year cycle beginning July 2008. Until then holders of the following licenses are required to complete 8 hours of continuing education each year:~~

- ~~(e) Class 2 Boiler — Pressure Vessel Installer;~~
- ~~(f) Class 3 Boiler — Building Service Mechanic;~~
- ~~(g) Class 4 Boiler — Boilermaker;~~
- ~~(h) Class 5 Boiler — Pressure Piping Mechanic;~~
- ~~(i) Class 5A Boiler — Process Piping Mechanic; and~~
- ~~(j) Class 5B Boiler — Refrigeration Piping Mechanic.~~

Stat. Auth.: ~~ORS 183.335~~ **ORS 455.117**

Stat. Implemented: ~~ORS 183.335~~ **ORS 455.117**

Hist.: BCD 16-2006(Temp), f. 6-30-06, cert. ef. 7-1-06 thru 12-28-06; BCD 13-2006, f. 9-29-06, cert. ef. 10-1-06

### 918-030-0125

#### Licenses Requiring 16 Hours of Continuing Education

During each three-year license cycle, the following license holders are required to complete 16 hours of approved continuing education, including one code-change course if required by the appropriate board:

- (1) Limited Residential Electrician
- (2) Limited Journeyman Manufacturing Plant Electrician

Stat. Auth.: ~~ORS 183.335~~ **ORS 455.117**

Stat. Implemented: ~~ORS 183.335~~ **ORS 455.117**

Hist.: BCD 16-2006(Temp), f. 6-30-06, cert. ef. 7-1-06 thru 12-28-06; BCD 13-2006, f. 9-29-06, cert. ef. 10-1-06

### 918-030-0130

#### Licenses Requiring 8 Hours of Continuing Education

During each three-year license cycle, the following license holders are required to complete 8 hours of approved continuing education, including one code-change course if required by the appropriate board:

- (1) Limited Maintenance Electrician;
- (2) Class A Limited Energy Technician;
- (3) Class B Limited Energy Technician; and,
- (4) Solar Heating and cooling System Plumbing Installer; **and,**
- (5) Class 2 Boiler Pressure Vessel Installers.**

Stat. Auth.: ~~ORS 183.335~~ **ORS 455.117**

Stat. Implemented: ~~ORS 183.335~~ **ORS 455.117**

Hist.: BCD 16-2006(Temp), f. 6-30-06, cert. ef. 7-1-06 thru 12-28-06; BCD 13-2006, f. 9-29-06, cert. ef. 10-1-06

### 918-030-0135

#### Licenses Requiring 4 Hours of Continuing Education

During each three-year license cycle, the following license holders are required to complete 4 hours of approved continuing education, including one code-change course if required by the appropriate board:

- (1) Limited Renewable Energy Technician; and
- (2) Limited Journeyman Sign Electrician.

Stat. Auth.: ~~ORS 183.335~~ **ORS 455.117**

Stat. Implemented: ~~ORS 183.335~~ **ORS 455.117**

Hist.: BCD 16-2006(Temp), f. 6-30-06, cert. ef. 7-1-06 thru 12-28-06; BCD 13-2006, f. 9-29-06, cert. ef. 10-1-06

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