455 Golden Gate Ave., 10th Floor
San Francisco, CA 94102
Phone (415) 403-4920
FAX (415) 703-5477

STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF APPRENTICESHIP STANDARDS

AUDIT REPORT
For
Southern California Plastering Joint Apprenticeship and Training Committee, File No. 05090

The Division of Apprenticeship (DAS) Mission Statement creates opportunities for Californians to gain employable lifetime skills and provides employers with a highly skilled and experienced workforce while strengthening California's economy

RECEIVED
DAS RECORDS SECTION
SAN FRANCISCO
08 APR 21 AM 11:18

CONTENTS

Summary.....3

Findings and Recommendations.....3

Audit Highlights/Introduction/Background.....4

Scope/Focus/Methodology.....5

Audit Results and Recommendations.....6

Comments from Program Sponsor.....15

Correction and Timeline.....15

Remarks.....16

SUMMARY

The Division of Apprenticeship Standards (DAS) presents its audit report concerning the Southern California Plastering Joint Apprenticeship Training Committee (JATC) program; DAS file number 05090, (hereafter "program").The program's standards were proposed on May 22, 2006, and approved on August 16, 2006. The program was selected for audit compliance by the Chief of the Division of Apprenticeship Standards. The audit was performed from February 26, 2008, through February 28, 2008, and was conducted pursuant to California Labor Code §3073.1.

During the exit interview the Apprenticeship Coordinator, Neil Halliday commented that since the program was new the audit findings and recommendations would be used as a learning tool to help the program achieve its goal of graduating skilled journeymen.

During the audit preparation it was discovered that the actual number of registered apprentices reported to the DAS was not accurate. The number reported was 110 registered apprentices, when in fact according to the program it has 92 registered apprentices. The program and DAS took steps to correct the records and submitted the correct figures.

NUMBER OF REGISTERED APPRENTICES'

DAS Records Based Upon Program's Submittals	110	According to Program	92

FINDINGS AND RECOMMENDATIONS

As noted in the detailed report which follows, the auditor found that some specific actions are necessary to bring the program into compliance with their approved standards and legal requirements. The program is doing an adequate job at training and keeping apprentices on schedule. However DAS identified some inadequacies of the programs compliance with their own standards and to the State apprenticeship laws and regulations. DAS found this program needs to implement moderate changes to meet apprenticeship requirement and retain State approval.

The program was receptive to the recommendations made by the auditor and immediately implemented some record keeping changes to bring the program into compliance with their approved standards and legal requirements.

The program is too new (18 months) to have any significant completion rates, but the coordinator stated that the Southern California Plastering Joint Apprenticeship Training Committee (JATC) is committed to helping apprentices reach their goal of becoming journeyman in the trade within the specified time frame.

Detailed findings and recommendations are included in this report. The coordinator was presented with a summary of the findings and a recommendation was presented to assist him in preparing the appropriate corrective action. The DAS will visit the program in the future to verify compliance with the recommendations. These DAS audit procedures allow the program to respond to the recommendations and their response will become part of this formal report

AUDIT HIGHLIGHTS.....

Our review of the Southern California Plastering Joint Apprenticeship Training Committee (JATC) program; Division of Apprenticeship Standards (DAS) file number 05090, (hereafter "program") found that:

- Our review found that the program has not submitted any revisions since 2006.The standards state that the term of apprenticeship shall be 6,000 OJT hours within a 48 month period. The program is requiring 6,200 OJT hours within a 48 month period.

- The program requires all apprentices to sign and confirm that they understand the program's Rules and Regulations. Most of the apprentice files examined were in disarray, and did not contain signed copies of the rules and regulations receipt.

- The program files did not contain consistent verifiable OJT work hours.

- The apprentice is required to complete an Apprentice Record Book (wallet) to track work processes and OJT work hours, but none of the files examined contain a copy of the blue book.

- Work processes are consistent with program apprenticeship standards but are not properly recorded.

Continued on next page....

INTRODUCTION/BACKGROUND

The audit began on February 26, 2008, and was completed on February 28, 2008. The auditor met with key administrative personnel, examined records, observed administrative activities, conducted a walk-through of the training facility and visited two job sites in connection with the audit.

The Southern California Plastering Joint Apprenticeship Training Committee (JATC) program operates as a Labor/Management Cooperative and the principal partners in the cooperative effort are Southwest Association of Plaster Contractors and Southwest Regional Council of Carpenters. The program has an Apprentice Trust Fund. The program's funding mechanism comes from employer Contributions, Related Supplemental Instructional (RSI) Funds and state prevailing wage training fund contributions.

The daily operations, management and administrative functions are run by 4 primary staff, the Director, Coordinator, Instructor, and Office Manager. The program has 1 full time instructor. The instructor is new and in the process of obtaining his community college training credential. The program office is located at 2831 West First Street, Santa Ana, California 92703-4101. The program utilizes 5 other training facilities to train apprentices. They are located in Bakersfield, Arroyo Grande, Sylmar, Whittier, and San Diego. Each training facility utilizes a clerical worker to maintain the apprentice files and the instructor travels to each training facility as scheduled. Apprentice RSI hours are inputted into a master computer data base as completed but are not kept in the apprentice file.

Employers are approved to train when they have completed an Agreement to Train Apprentices, DAS-7 form. The program indicated that they dispatch to both union signatory employers and non-union employers who agree to abide by the program's standards, rules, regulations and policies.

The Plastering Apprenticeship is a 48-month program. Apprentices meeting the required advancement criteria progress through 8 upgrades steps until completion. Training consists of 640 hours of related supplementary instruction and (per standards) 6000 hours of accumulated on the job training.

- The job site review found that the apprentices are not sure how to complete the record book and none of the apprentices interviewed had one in their possession.
- The apprentice files did not contain copies of school absences, evaluations, and progress reports.

The Related and Supplemental Instruction is provided by the program's training center which is at the same site as the program operations. Each apprentice enrolled receives an orientation packet that includes the rules and regulations, an explanation of the program standards, the Apprentice Record book (blue book) and a class schedule. The program has two Local Education Agencies (LEAs). One is Santiago Canyon College located at 8045 East Chapman Avenue, Orange, California 92869, and the other is Palomar College located at 1140 West Mission Road, San Marcos, California 92069.

SCOPE AND FOCUS

The principal objectives of the audit are to ensure the program is complying with their standards, that all on-the-job training is performed by a journeyman, that all related and supplemental instruction required by the apprenticeship standards is being provided, that all work processes in the apprenticeship standards are being covered, and that graduates have completed the apprenticeship program's requirements.

The audit focused on reviewing records and activities that tend to support and substantiate the program's efforts, practices, system and capabilities to provide and deliver the on-the-job training and related instruction. The program's policies and procedures were reviewed to determine if they support the program's approved standards.

METHODOLOGY

After completing an initial review of the program's standards and records on file with the DAS, an audit plan was established with the following steps:

1. Notified the program 14 days in advance of our intent to audit.
2. Prepare an entrance interview
3. Organization of all working paper to conduct the interview
4. Confirm the location where records are maintained
5. Conduct a review of all apprentice files
6. Set the time and date of the meeting
7. Schedule inspection of the training facility and job sites
8. Request and review copies of the committee meeting minutes for the last 12 months.

All steps listed above were accomplished and include interviews with primary staff, apprentices and job site supervisors.

AUDIT RESULTS

1. STANDARDS

The objective is to determine whether the programs are submitting periodic revisions to their standards and if standards are reasonably current. "Standards" are a written document containing all terms and conditions for the qualification, recruitment, selection, employment and training, working conditions, wages, employee benefits and other compensation for apprentices. It may also include other provisions and statements. All apprenticeship programs are required to submit their apprenticeship standards to the DAS Chief for approval. The California Code of Regulations states the program must submit revisions to its standards when necessary.

(a) *Findings*

(1) Our review found that the program has not submitted revision of standards since 2006.

(2) The program standards state the apprentice shall complete 6000 OJT hours within a 48 month period. The program is requiring the apprentice to complete 6200 OJT hours within a 48 month period.

(b) *Recommendations*

(1) Submit a current revision of the Committee Standards. The revision should include changing required OJT hours from 6000 to 6200 to comply with programs existing requirement. - due within 60 Days.

(2) In the future review and update standards as needed.

Article IV (5) of the program's standards, Section 205 (f), 212 (a)(6) (7), (c)(2) (11) of the California Code of Regulations states that the program sponsor must submit revisions to its standards when necessary.

2. RULES AND REGULATIONS

The objective is to determine if the programs have adequate rules and regulations, are implementing them as required, and provide a copy to the apprentices. The rules and regulations can be defined as an orientation or workshop session that explains the apprenticeship program standards and the operation of the apprenticeship program. It includes information on what is expected by both the program and the apprentice.

The rules and regulations for this program were adopted and contain a policy statement showing responsibilities of the apprentice and the committee. Apprentices are cited for failure to follow the rules and regulations. A letter of citation is mailed to the apprentice to appear before the committee and failure to appear is reason to recommend cancellation from the program for failure to comply with a committee directive. Additionally, the rules and regulations state that each apprentice will be notified in writing of the date(s) that she/he is to attend RSI classroom training.

No physical examination is required prior to indenture. However, applicant must be able to physically perform the work of the craft. When the apprentice is approved by the program to enter the training he/she is given a copy of the rules and regulations and attends an orientation session with both the coordinator and educational instructor. Then the apprentice must sign the document indicating they have received, read and understood the rules and regulations.

(a) *Findings*

(1) This review found that the apprentice files did not contain a signed receipt to show that the apprentice had received, read, or understood the rules and regulations.

(2) The apprentice files did not contain copies of citation letters.

(3) The apprentice files did not contain copies of the classroom training notices.

(b) *Recommendations*

(1) Review Rules and Regulations Apprenticeship Guidebook annually and update as needed.

(2) Distribute new rules and regulations to all apprentices and retain a copy of a signed receipt in each apprentice file – due within 90 days.

(3) Enforce the provision of rules and regulations by inserting into the apprentice file copies of the citation letter - due within 60 days.

(4) Enforce the provision of the rules and regulations by inserting into the apprentice files copies of the RSI training notice letter – due within 60 Days.

Article VI (2) of the program's standards, Section 3071, 3073, and Section 212 (a) (6) (7), (c) (2) (3) (8), (14) of the California Code of Regulations states that the program must establish rules and regulations that govern the program.

3. ACTIVE APPRENTICES AND CANCELLATIONS

The review of this item is to determine if the program is monitoring apprentices as they enter and proceed through the program. It is also to determine if the program is maintaining accurate records on both the active and cancelled apprentices. The program should have the ability to provide evidence of procedures used for periodic reviews and evaluation of the apprentice's progress in job performance and related instruction and maintenance of appropriate progress records. In addition, the program should have a process in place to notify the DAS when an apprentice leaves the program.

During the initial preliminary audit preparation it was discovered that the actual numbers reported to the DAS were not accurate.

(a) *Findings*

(1) The program's numbers of registered apprentices were incorrect. The number of registered apprentices based upon DAS records is 110. Program records indicate they have 92 indentured apprentices.

(b) Recommendations

(1) The program will keep the DAS informed of indentures, cancellations and completions in a timely manner - due within 30 days.

(2) The program should continue to monitor the apprentice's progress in the program at least every 30 days.

(3) All changes affecting the status of the apprentices in the program must be submitted to the DAS.

Section 205 (a)(1)(2) (i), 212 (a)(6) (7)(8), (b)(9), (c)(2)(10) 224 of the California Code of Regulations states that the program sponsor must maintain accurate apprenticeship records and submit changes, updates and revisions of an apprentice's status when necessary.

4. ON -THE JOB TRAINING (OJT) PROGRESS RECORDS, ADVANCEMENTS AND EVALUATIONS

Our review is to determine if apprentices are progressing on schedule, that the program is maintaining adequate OJT records, receiving periodic evaluations and if the program has an adequate records and a system in place to ensure that apprentices are covering all the work processes.

The program uses the following items to track apprentice's schedules: OJT records, periodic evaluations and work processes. Each apprentice shall receive normal upgrades in the period and wage by meeting the following requirement:

- Completion of 80 RSI classroom hours. Apprentices are scheduled for 40 hours of classroom training every three months for a total of 160 per year.
- Accumulation of 775 OJT hours verified by the Carpenters Trust Administration and/or original check stub from an approved contractor.
- Completion of required classes.
- DAS Apprentice Record Book to verify work processes and track work hours. The record book must be signed by the employer before turning in the book to the program.

The program issues all newly indentured apprentices the DAS "Apprentice Record Book" to record their daily work assignments. The apprentice is then required to turn-in this book when they report to school (every three months). If they are current with their RSI hours and have the required OJT hours they are advanced to the next level of training and receive a wage increase. Our audit of the files found that none of the files reviewed had copies of the record book.

Currently the program is not utilizing the record book and is not verifying the various work processes. The program relies on the approved contractor (employer) to turn in the apprentice's hours to the Carpenters Trust Administration. An apprentice whose OJT hours cannot be verified by the Trust Administration report is required to verify OJT hours by presenting original check stubs from an approved contractor. When the apprentice is scheduled for class (every three months) a master report is generated from the Trust Administration calculating accumulated OJT hours. The program is only relying on total OJT hours worked and class completion (verified by the instructor) for upgrades.

(a) *Findings*

(1) The program is not utilizing the record book or any other type of tracking record form/process, and is not verifying the various work processes.

(2) The apprentice files contained only total OJT hours worked. No proof of a breakdown in OJT hours and work processes could be verified.

(3) The apprentice files did not contain copies of a complete and signed record book or other form of tracking record process to verify work process hours.

(b) *Recommendations*

(1) Develop a process to track and/or identify apprentice OJT work process hours. Keep a copy of this information in each apprentice file. Plus have all forms verifying this information signed by the apprentice and the employers - due within 60 days.

(2) Keep the complete and signed Apprentice Record Book in each apprentice file. Additionally develop a consistent process to track and/or identify apprentices who have not submitted timely OJT hours – due within 60 days.

(3) Provide training and instruction to the apprentices on how to properly record OJT hours and work processes – due within 60 days.

Section XVII of the program's standards, and Section 3073.1, 3076, 3078(e) of the Labor Code, and Sections 208, 210, 212(a) (4) (5) (7) (8), (b) (9), (c) (2) (6) (8) (9) (16) (18), of the California Code of Regulations. The program must offer training and supervision in all the work processes defined in its standards and has a system to ensure that apprentices cover all the work processes. The program must have a system of documenting and maintaining records that will assist in the review and evaluation of each apprentice's progress in job performance. The program must have a procedure for recording and maintaining accurate records, and a procedure for periodic review and evaluation of progress.

5. RELATED AND SUPPLEMENTAL INSTRUCTION (RSI)

The objective of our examination was to determine if apprentices are progressing on schedule, attending classes, covering the entire course of

study, and to ensure the programs are maintaining accurate records with adequate systems in place to provide training.

The program's Related and Supplemental Instruction (RSI) is approved by two Local Education Agencies (LEA's): Santiago Canyon College located in Orange California and Palomar College which is located in San Marcos California. Note: Santiago Canyon College excludes San Diego county. The course outlines as written by the program have been reviewed and approved by the two LEA's.

The apprentices are required to attend 40 hours of instruction 4 times per year which are scheduled every 3 months for a total of 160 hours per year. Each student is issued a calendar with the schedule of classes. Classes start promptly at 6:00 AM for an 8 hour period. The rules and regulations state that each apprentice will be notified in writing of the date(s) that he/she is to attend classroom training. Apprentices are considered tardy after 6:31 AM. After 3 instances of tardiness the student will be required to make up one day. Apprentices who are absent from a class more than one day will be dropped from that class.

Every apprentice must bring tools and study materials to class before signing in on the "class sign-in sheet" for each class. The rules and regulations state that the apprentice shall first request permission, in writing, from the Committee/Coordinator to be excused from attending classes, indicating the documented reason for such a request.

(a) *Findings*

(1) The records of attendance and classroom hours for the apprentices are recorded on the apprenticeship coordinator's computer data base, but no record of this information was found in the apprentice file.

(2) The apprentice files did not contain a consistent record of all absences related to school attendance. The files did not contain grade and completion reports from the instructor with a recommendation that the apprentice is ready for the next level in training.

(b) *Recommendation*

(1) Apprentice file folders should contain the apprentice's attendance record, pass or fail records, upgrades, copies of advancement letters to employers and any disciplinary actions for school attendance issues.- due 60 within days

(2) Apprentice file folders should contain copies of the apprentice's tests including grades/scores, progress reports recommending apprentice to next level.- due 60 within days

(3) Instructor should explore and continue to provide updates to the program and the apprentice(s) on how the apprentice(s) are progressing in their required educational courses. Review curriculum and develop new courses to cover additional needs when needed.

Section XVI of the program's standards, Section 3073.2, 3078(d), of the California Labor Code, and Section 205(e)(h), 212(a)(3)(6)(7) (c)(13)(14) of the California Code of Regulations states that it is

recommended that the program provide a minimum of 144 hours per year of supplemental instruction for each year of apprenticeship and adequate arrangements for related and supplemental instruction, and have the ability and commitment to train apprentices with current industry standard criteria.

6. TRAINING CENTER

The objective is to ensure the program has adequate facilities, tools, materials and equipment to train apprentices, and to determine if the facilities are utilized and adequate for training.

The program employs one full time instructor (Jacob Lopez) who is a certified plaster journeyman. He is in the process of obtaining his community college training credential. Per the standards he has two years to obtain his training credentials. During the visit, classes were not in session at this training center. The program is currently utilizing a total of six training centers located in Arroyo Grande, Bakersfield, Orange County, San Diego, Sylmar, and Whittier. The instructor conducts classes on a weekly schedule at the various training centers. The auditor spoke with the instructor and toured the Orange County facility. The training center is located next to the program. The training center consists of three large classrooms and shop labs utilized for demonstrations and hands-on working booths to make special projects. Each apprentice must complete a variety of shop projects and show competency in applying the trade. The instruction is done with good health and safety practices in mind.

(a) *Findings*

(1) Our inspection of the training facility found it to be sufficient to train apprentices.

(b) *Recommendation*

(1) The program should continue current practices and insure plans for growth are based upon the current successful model.

Section 3074 of the California Labor Code—Section 212(a) (3) (4) (8), (c) (13) (12), 212.3 of the California Code of Regulations states that the program sponsor must have adequate arrangements for related and supplemental instruction.

7. MECHANISM TO KEEP APPRENTICES REASONABLY EMPLOYED

Our objective is to determine if apprentices are kept reasonably employed, to ensure the program has adequate systems in place to rotate apprentices so they cover all work processes, and to provide apprentices with continuing employment in the event of a layoff.

The review found the program has an established system to keep apprentices reasonably employed and to provide them with continuing employment in the event of a layoff. If an apprentice becomes unemployed he should immediately register on the out-of-work list at his local union. In addition apprentices are given a list of employers and are encouraged to solicit employment with an employer within any of the twelve counties covered by these Standards.

Apprentices attending 40 hours of RSI classroom training may be eligible for unemployment insurance benefits. Unemployment insurance telephone numbers are given to those apprentices meeting EDD criteria.

(a) *Findings*

(1) The review found the program has an established system to keep apprentices reasonably employed and to provide them with continuing employment in the event of a layoff.

(2) The records found the referral/dispatch system keeps the apprentices employed within their industry. They are also referred to other employers, giving the apprentices an opportunity to train in all work processes.

(b) *Recommendation*

(1) The program should continue the system they have in place and encourage additional employer involvement.

(2) The program should continue to refer apprentices to other employers and encourage the apprentices to solicit work on their own.

Section 3080 of the Labor Code, and Section 212 (b) (7) (9), (c) (16) (18) of the California Code of Regulations. The program(s) must have a mechanism to keep apprentices reasonably employed and maintain accurate documentation Section 3080 of the Labor Code, and Section 212 (b) (7) (9), (c) (16) (18) of the California Code of Regulations.

8. JOB SITE VISIT

A review of the job site offers an opportunity to view a job in progress, observe the work that is being done, and allows us to discuss the operation of the program with the apprentice. It enables direct contact with the apprentice to determine the following:

- If the apprentice is performing the various tasks listed within the work processes of their trade.
- If advancements are made on schedule.
- If the apprentice is receiving the correct pay and benefits.
- If the apprentice is kept employed on a reasonably continuous basis.
- If the program's mechanism to keep apprentices reasonably employed is adequate.

The program suggested five job site locations to visit. Telephone calls were made to arrange a review of the job sites and contact was made with two locations.

The auditor visited the World-Mark by Trend-West job site located in Anaheim California and found two apprentices working under the supervision and direction of journeymen and employed at tasks defined within the work processes of the program standards.

The auditor also visited the Alexander McQueen's job site located in Los Angeles California and found six apprentices working under the

supervision and direction of journeymen and employed at tasks defined within the work processes of the program standards.

Interviews were conducted with all of the apprentices. Auditor found that the apprentices had the equipment, materials and tools of the trade sufficient to train apprentices. Each apprentice receives proper pay and benefits and attends OJT classroom training. The interviews confirmed apprentices are advanced on schedule. Auditor confirmed that each apprentice writes in the total hours of OJT training in the apprentice record book, but most were confused on how to complete the work processes. None of the apprentices had his record book in his possession. When asked where they were they stated in was either in their car or at home. The apprentices stated they rely on their foreman/supervisor or classroom instructor to ensure they are completing there work process and OJT work hours properly. The record book is signed by the job site supervisor validating the work processes and OJT work hours and turned into the classroom instructor when the apprentice reports for school (once every three months), but records reviewed as stated in previous item #4(a) Finding: No proof of a breakdown on OJT hours and work processes could be verified.

The interview with the supervisors confirmed there is a proper ratio of journeyman to apprentice and adequate supervision. All the apprentices' interviewed stated they were satisfied with the program and were being properly trained.

(a) *Findings*

(1) The auditor(s) found that apprentices are not sure how to properly complete the blue OJT Record Book. In addition the work processes are not filled out.

(2) The auditor found that the apprentices did not have the OJT record book in their possession and were not filling it out in a timely manner.

(b) *Recommendations*

(1) The program needs to ensure that the apprentices are recording their OJT hours and are correctly tracking these hours within the individual work processes. The program should provide training and instruction to the apprentice and the employer(s)/supervisor(s) on how to properly record OJT hours and work processes – due within 60 days.

(2) The program should develop a system to ensure each apprentice turns in their record book to the program and keep a complete and signed record book in each apprentice file – due within 60 days.

Section 208, 212(a) (1) (2) (4), (b) (4) (5) (6), (c) (6) (13) (14) of the California Code of Regulations states that all on-the-job training will be performed by journeymen, that all related and supplemental instruction required by the apprenticeship standards will be provided, that all work processes in the apprenticeship standards are being covered, and that graduates have completed the apprenticeship program's requirements.

9. SELF-ASSESSMENT REVIEW AND PROGRAM IMPROVEMENT PLAN

The objective is to determine if the program has submitted the annual Self-Assessment Review and Program Improvement Plan. The California Code of Regulations Title 8, Section 212.3 requires programs to perform an annual self-evaluation and to create an improvement plan. The DAS now requires that each program submit a copy of their Annual Self-Assessment Review and Program Improvement Plan to their apprenticeship consultant by December 1 of each year.

(a) *Findings*

(1) The required annual Self-Assessment Review and Program Improvement Plan were submitted on December 13, 2007.

(b) *Recommendations*

(1) Use the Self-Assessment and Program Improvement Plan as a tool for setting goals for your program and adapt the listed changes during the next 12 month period.

Section 212 (a) (6) (7), (c) (2) (11), 212.3 of the California Code of Regulations states that the program sponsor must submit annually a Self-Assessment Review and Program Improvement Plan to the DAS.

10. COMMITTEE MEETINGS AND MINUTES OF MEETING

Joint apprenticeship committees have equal representation from labor and from management. Each committee also includes a consultant representing the Division of Apprenticeship Standards or the Bureau of Apprenticeship and Training, U.S. Department of Labor. There is also an advisor from the local public school district, and such other advisors and the apprenticeship consultant act without vote. This committee is responsible for administering the Standards for this program. In carrying out its functions, the committee has certain authority under the law. The actions, therefore, must be in accordance with approved apprenticeship standards and should be recorded in the minutes.

The objective is to determine if the apprenticeship committee is meeting on a regular basis, documenting actions, discussing and reviewing apprenticeship records, and making appropriate assessments and evaluations.

The committee provided the program meeting minutes for the past year. The meetings are held bimonthly, unless more meetings are necessary to address certain issues. The meetings are conducted in the Santa Ana office. An advance notice is sent out to all members and guest of the committee. The coordinator stated that disciplinary meeting are conducted once a month in conjunction with the Drywall Lathers in the same location. There are no records of those meeting other than the final determination which is noted in the committee meeting.

The program's rules and regulations state that this committee is a Labor/Management Co-Operative. Also noted in the rules and regulations are five Labor Trustees and five Management Trustees. The committee also includes the apprenticeship coordinator and two Local Education Agency Representatives (LEA's).

The program stated that all disciplinary actions must be reviewed by the committee.

(a) *Findings*

(1) Our review of the committee minutes for the last 12 months showed that the committee had a record of disciplinary actions.

(2) The committee minutes were sufficient in form and content.

(3) Disciplinary meeting are held once a month but there are no minutes or records of those meeting.

(b) *Recommendations*

(1) Continue to hold regular meetings and keep accurate committee minutes and records.

(2) Ensure that DAS apprenticeship consultant is advised of committee meetings well in advance and the consultant will endeavor to participate in meetings when possible.

(3) Keep accurate minutes of disciplinary meeting and incorporate with bimonthly minutes. Ensure DAS apprenticeship consultant is advised of disciplinary meeting well in advance. – due within 30 days.

Section 3076, 3080(b), 3078(d)(f), 3079, 3093(k), of the California Labor Code, and Section 213, 218, 212(7), 208(5), 205(e)(f)(g)(i), 212(c)(1)(6) (9), 224 of the California Code of Regulations states that the program sponsor must maintain adequate documentation and records.

11. COMMENTS FROM PROGRAM SPONSOR

Comments, if submitted by the program sponsor during the 14-day review and comment period, will be included with this report to the Chief of DAS and ultimately to the California Apprenticeship Council.

12. CORRECTIONS AND TIMELINE

The audit findings and recommendations are set forth in this report. The program has 14 days from the receipt of this report to review and submit comments on the report.

Within 10-days following the receipt of comments or the completion of the comment period, a final report will be submitted by the Chief of DAS to the California Apprenticeship Council.

The final report will detail the findings with recommendations for remedial actions. The programs must remedy all deficiencies and be in full compliance with their apprenticeship standards. The programs must notify the DAS in writing when deficiencies have been remedied. A DAS representative will schedule an appointment to review the completion of the remedial actions. Failure to comply may be grounds for withdrawing state approval of the apprenticeship programs.

13. REMARKS

The results of this audit do not modify, replace or negate other duties and requirements or any previous notices you may have received regarding the fulfilling of your obligations prior to or after the audit period. In addition, law changes or new rulings might result in different findings in future audits.

Respectfully submitted by,

Salvador Trujillo

4-19-08

Salvador Trujillo
Apprenticeship Consultant
DAS, Los Angeles District Office

Date

Southern California Plastering
Joint Apprenticeship and Training Committee

Orange County Training Center • 2831 W. First Street • Santa Ana, California 92703
Telephone: (714) 571-0449 • FAX: (714) 571-0747 • Email: octc@californiacarpenters.org

April 14, 2008

RECEIVED DIR/DAS LOS ANGELES 08 APR 16 PM 2:

Reply to Audit Report for Southern California Plastering JATC
File No: 05090
DAS Auditor, Sal Trujillo

After reviewing the audit for the Southern California Plastering JATC, I can see there is a need for some corrections. I will do my best to reply to all of the auditor's findings and be assured the Southern California Plastering JATC (SCPJATC) has all intentions to comply with all and any recommendations the DAS will request.

Page 4:

- The DAS Auditor is concerned about the OJT hours and submitting revisions. The SCPJATC would like to submit a revision but have had the understanding we could not until after our first one-year review (audit)
- The additional 200 OJT hours were added after we submitted the original program standards with 6,000 hours. The committee would like to keep the original 6,000 hours.
- The program requires all apprentices to sign and confirm that they understand the program "Rules and Regulations". Your auditor states there were no copies in the files. We found that 98% of the files have the receipt in the file.
- Your auditor states the DAS 103 – Blue Books were not in the apprentice's files. He actually says "none" of the files examined contain the Blue Books. Of the 13 files examined at the Orange County Training Center, six had record books and five were newly indentured and had not yet been scheduled for class. Two files were missing the Blue Books. Since the audit, there has been a new policy implemented that all (100%) of the apprentices must turn in the Blue Book or be cited to the committee for disciplinary action.
- Work process hours are not properly recorded, this is partially true. We are in the process of installing a new computer system throughout the Southwest Carpenters Training Fund that currently does not have the capability of tracking OJT hours by process. We have been told that this will be corrected soon.

DAS RECORDS SECTION SAN FRANCISCO 08 APR 21 AM 11:18

Page 5:

The auditor's report says: The jobsite review found that the apprentices are not sure how to complete the record book and none had one in their possession.

Reply: The apprentices are taught how to fill out the Blue Books and given an example to help them. The instructor spends one hour *every* class session reviewing and explaining with an example on an overhead screen.

When on a jobsite visit, the auditor found that no apprentices had a Blue Book in their possession. We encourage our apprentices to leave their Blue Books in their vehicles or at home to keep them clean and safe from being lost until they need to be signed. Perhaps we should revisit this.

The report says the files do not contain school absences, evaluations and progress reports.

Reply: The files do contain these items. In addition, each time an apprentice is eligible for an upgrade, a full master report is put into the file that shows all grades, attendance, OJT hours and upgrade history.

2 (b)(3) A copy of the citation letter is filed in the apprentice file. This is JATC policy

2 (b)(4) A copy of the RSI training notice letter is filed in the apprentice file. This is JATC policy

Page 8

3 (b)(1) The DAS is notified of new indentures, cancellations and completions in a timely manner.

3 (b)(2) The program will monitor the apprentices progress every time they attend RSI and when the field coordinator visits the jobsite.

3 (b)(3) All changes affecting the status of apprentices will be submitted immediately to the DAS upon approval of the committee.

Page 9

4 (a)(1) We are using the record books (Blue Books)

4 (b)(1) We need to develop a process to track and or identify OJT work process hours within 60 days.

4 (b) 2) We will keep the signed Blue Books in the apprentices files. All apprentices will turn in their Blue Books every time they attend RSI or they will be cited to the committee. Effective February 15, 2008.

4 (b)(3) Provide training and instruction to the apprentice on how to properly record OJT hours and work processes. This is "already in place" but we make adjustments.

Page 10

Paragraph 3. Class starts at 6:30 a.m.

5 (b)(1) The items not found in the file folders are in the computer database, which we consider part of the apprentice file.

5 (b)(1) We continually review our curriculum and develop new updates

6 – Paragraph 2: Jacob Lopez is in the process of obtaining his California Vocational Teaching Credentials

6 (a)(1) Thank you

6 (b)(1) Thank you

7 (b) (1) Good

7 (b)(2) Good

8 (b)(1) The program is training the apprentices on how to properly fill out the Blue Book for the work processes but we will develop a new angle in hopes that the apprentices will retain the information better.

8 (b)(1) The program has put out a memo on February 15, 2008 to all instructors and training centers that all apprentices (100%) will turn in their Blue Books every time they attend RSI or they will be cited to the committee (enclosed).

8 (b)(2) The program will collect and keep a copy of the signed Blue Book in every apprentice file effective immediately.

9 (b)(1) We will continue to submit the self-assessment review and program improvement plan by December 1 of each year.

10 (b)(1) Good

10 (b)(2) We will continue to notify the DAS

10 (b)(3) We will hold a separate disciplinary subcommittee meeting for Plastering apprentices immediately following the Drywall/Lather subcommittee on the first Tuesday of every month.

Please let me reiterate, the SCPJATC has all intentions of complying with all recommendations by the DAS in a timely manner and if you have any questions, please do not hesitate to give me a call.

Sincerely,

Neil Halliday

NEIL HALLIDAY
Coordinator
Southern California Plastering JATC

NH:jh Opeiu#537Afl cio clc

Southern California Plastering
Joint Apprenticeship and Training Committee
Orange County Training Center • 2831 W. First Street • Santa Ana, California 92703
Telephone: (714) 571-0449 • FAX: (714) 571-0747 • Email: octc@californiacarpenters.org

Memorandum

TO: **Training Centers and Interior Systems Instructors**

FROM: **Neil Halliday**

RE: **Blue Books (DAS Form 103)**

DATE: **February 15, 2008**

The DAS recently audited our apprentice program and found some files without "blue books".

Effective immediately, all Interior Systems apprentices (100%) will turn in their blue books (work process hours) when attending school or they will be cited to the committee.

Please post "blue book" hours in TRAIN: Work Hours, "OJT Hours" and note in committee action blue book received and the months submitted. If an apprentice did not work for any month post "0" hours in OJT Hours for that month. A yellow page must be turned in for months not worked with a notation "unemployed".

Each time a blue book is issued, the apprentice must sign the "Apprentice Record Book" acknowledgement receipt. Post in committee action that you received the acknowledgement receipt.

All apprentices that do not turn in a blue book are to be placed on hold by the training center of record and will be cited to the next committee/subcommittee meeting.

If you have any questions please do not hesitate to call me.

NH:jh
Opeiu#537
Afl cio clc