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STATE OF CALIFORNIA DEPARTMENT OF INDUSTRIAL RELATIONS DIVISION OF APPRENTICESHIP STANDARDS

AUDIT REPORT For San Bernardino & Riverside Counties Plumbers and Steamfitters Joint Apprenticeship and Training Committee, File No. 00163

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

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SUMMARY

The Division of Apprenticeship Standards (DAS) presents its audit report concerning the San Bernardino & Riverside Counties Plumbers and Steamfitters Joint Apprenticeship Training Committee (JATC) program; DAS file number 00163, (hereafter "program"). The program's standards were completely revised on August 27, 2008. The program was randomly selected by DAS for audit compliance. The audit was performed from March 16, 2009, through March 24, 2009, and was conducted pursuant to California Labor Code §3073.1.

FINDINGS AND RECOMMENDATIONS

As noted in the detailed report which follows, the auditor found that the program is doing an appropriate job of training and keeping apprentices employed and on schedule; however, some record keeping changes are necessary to bring the program into compliance with their approved standards and legal requirements.

DAS identified some inadequacies of the program's compliance with their own standards and to the State apprenticeship laws and regulations. The program needs to instruct apprentices on how to accurately complete apprentice workbook (blue book) and implement a system to accurately document and track apprentices' on-the-job training and the various work processes to meet apprenticeship requirements and retain State approval.

Detailed findings and recommendations are included in this report. The Business Manager, Richard Edwards, 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.

The program was receptive to the recommendations made by the auditor and immediately started planning some record keeping changes to bring the program into compliance with their approved standards and legal requirements. During the exit interview Richard Edwards commented that the audit findings and recommendations would be used as a learning tool to help the program achieve its goal of graduating skilled journeymen within the trade.

AUDIT HIGHLIGHTS.....

Our review of the San Bernardino & Riverside Counties Plumbers and Steamfitters Joint Apprenticeship Training Committee (JATC) program; Division of Apprenticeship Standards (DAS) file number 00163, (hereafter "program") found that:

- Audit review found that the program has submitted several revisions (DAS 24) to its approved standards, the most recent being approved on October 3, 2008. The DAS approved program's complete revision to its standards on August 27, 2008.

- The program standards require all apprentices be given the opportunity to study the program standards before indenture. Apprentices files examined did not contain a form or receipt signed by the apprentice acknowledging he/she had read and understood the standards.

- 63% of the program files examined did not contain consistent verifiable on-the-job (OJT) work process hours.

- 17% of the apprentice blue books examined did not contain a journeyman signature verifying the work processes worked by the apprentice.

- The job site review found that apprentices are working under the supervision of a qualified journeyman and there is a proper ratio of apprentice to journeyman.

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INTRODUCTION/BACKGROUND

The audit began on March 16, 2009, and was completed on March 24, 2009. The auditor met with key administrative personnel, examined apprentice records, observed administrative activities, conducted a walk-through of the program administrative office, toured the Colton training facility, and visited two job sites in connection with the audit.

The San Bernardino & Riverside Counties Steamfitters Joint Apprenticeship Training Committee (JATC) program operates as a Labor/Management Cooperative and the principal partners in the cooperative effort are California Plumbing and Mechanical Contractors Association and San Bernardino & Riverside Counties Plumbers & Steamfitters Local 364. 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 Business Manager, Training Director, Office Manager and Administrative Assistant. The program office is located at 223 South Rancho Avenue Colton, CA 92324. The program Local Education Agency (LEA) is the Los Angeles Unified School District.

The Related and Supplemental Instruction is provided at the program's three training facilities which are located in Compton, Gardena, and Colton California. Each apprentice enrolled receives an orientation packet that includes the rules and regulations, attendance procedure, course syllabus, and a class schedule.

Each training facility maintains the apprentice class records, copies of attendance sheets, final exams, and class schedules. Apprentice class hours, absences, and final exam scores are inputted into program's computer data base as completed and are kept in the apprentice file.

- Work processes are consistent with program's approved apprenticeship standards but are not being properly tracked or recorded.

- The apprentice files contained copies of school absences, evaluations, and progress reports.

- The program has completed and submitted the annually required (Self-Assessment Review and Program Improvement Plan) to DAS in a timely manner.

- The program committee meeting minutes include formalized motions to approve indentures, upgrades, prior credit, cancellations, completions, evaluations and discipline of apprentices.

- During the audit it was discovered that the actual number of registered apprentices reported to the DAS was not accurate. According to DAS records the program has 146 indentured apprentices. According to the program it has 138 registered apprentices. Currently there are no active apprentices indentured in the Maintenance Plumber occupation but the program is planning on using the occupation in the future.

The San Bernardino & Riverside Counties Plumbers and Steamfitters JATC is a 60 month apprenticeship program. Apprentices meeting the required advancement criteria progress through five upgrade steps until completion. Training consists of 1080 hours of related supplementary instruction and 7200 hours of accumulated on the job training.

The apprenticeship program provides a training program for the following occupations:

DOT Code: 862.381.030

Name of occupation	Term of occupation	Number of apprentices
Plumber	60 months	67

DOT Code: 862.381.03A

Name of occupation	Term of occupation	Number of apprentices
Maintenance Plumber	60 months	0

DOT Code: 862.361.022

Name of occupation	Term of occupation	Number of apprentices
Steamfitter-Pipefitter	60 months	87

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 audit review found that the DAS approved program's complete revision of its standards on August 27, 2008.

(2) Program is submitting Revision of Approved Standards (DAS 24) in a timely manner for DAS approval.

(b) *Recommendations*

(1) Continue to review and update standards as needed or whenever any changes are made to the apprenticeship program and report this information to the DAS Apprenticeship Consultant.

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 program conducts an orientation class for all newly indentured apprentices and also provides apprentices with an apprentice handbook. Program standards 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.

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 center he/she is given a copy of the apprentice handbook and attends an orientation session. Apprentice program standards state, each apprentice shall be furnished a copy of or be given an opportunity to study standards before indenture.

(a) *Findings*

(1) The apprentice files examined did not contain a signed receipt or any other type of acknowledgement validating the apprentice had received, and/or reviewed and understood the standards.

(b) *Recommendations*

(1) Distribute or have apprentices review program standards and retain a copy of a signed receipt in each apprentice file – due within 90 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.

(a) *Findings*

(1) The program's numbers of registered apprentices was incorrect. The number of registered apprentices based upon DAS records is 146. Program records indicate they have 138 indentured apprentices.

(b) Recommendations

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

(2) All changes affecting the status of the apprentices in the program must be submitted to the DAS consultant in a timely manner.

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 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 hours, RSI hours, and periodic evaluations. Each apprentice shall receive normal upgrades in the period by meeting the following requirement:

- Completion of 216 RSI classroom hours. RSI classes consist of five school years of 216 hours each for a total of 1080.
- Accumulation of 1500 OJT hours verified by the program's Trust Administration and/or original check stub from an approved contractor.
- Satisfactory completion (70% or higher) of final exam.

If the apprentices are current with their RSI classes and have the required OJT hours they are advanced to the next level of training and receive a wage increase.

The apprentices are utilizing their apprentice record book (blue book) to track and record their *daily* OJT work processes but are not completing the blue book and are not tallying the hours for each work process. The program collects the blue books twice a year but does not utilize them to evaluate if apprentice has completed the necessary OJT hours for advancement. The program verifies OJT work hours through a report issued monthly by the Apprentice & Journeyman Training Trust Fund of the Southern California Plumbing & Piping Industry. An apprentice whose OJT hours cannot be verified by the monthly report is required to verify OJT hours by presenting original check stubs from an approved contractor. When the apprentice is scheduled for an upgrade (once a year) a master report is generated calculating the accumulated OJT hours. The apprentice is eligible for an annual upgrade if he/she has successfully completed the required RSI classes and has worked a total of 1500 or more OJT hours.

(a) *Findings*

(1) The program is not utilizing the apprentice blue book to its fullest capability.

(2) The program does not have a mechanism in place to ensure apprentices are exposed and trained in all the various work processes. The program does not total or document the various OJT work processes worked by the apprentice.

(3) 17% of the blue books examined did not contain a journeyman signature verifying the work processes worked by the apprentice.

(b) *Recommendations*

(1) Instruct apprentices on how to properly complete apprentice blue book. Ensure apprentices are totaling OJT (work processes) hours correctly and continue to keep a copy of the record book in each apprentice file - due within 90 days.

(2) Establish an adequate record keeping mechanism for the purpose of tracking and totaling work processes to ensure apprentices are exposed and trained in the various work processes stated in the standards. Keep record in apprentice file – due within 90 days.

(3) Provide training and instructions to apprentices and employers on how to properly complete apprentice blue book. To employers stress the importance of journeyman signing blue books verifying apprentices OJT hours – due within 90 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 the Los Angeles Unified School District which is located at 333 Beaudry Avenue 28th Floor, Los Angeles, CA 90017. Oscar Meler is the "Teacher Advisor" of the apprenticeship program. The course outline as written by the program has been reviewed and approved by the LEA.

RSI classes consist of five school years of 216 hours each for a total of 1080 hours. A school year consists of two semesters of approximately 24 weeks each. The Fall semester begins in July and concludes in December. The Spring semester begins in January and concludes in June. At the end of the semester a calendar is posted with apprentice's next semester class schedule. Apprentices who dropped out or are new to the program receive a letter from the training center notifying them of their new class schedule.

Apprentices are required to sign in and out of each class. The training center keeps attendance sign in/out sheets and test results.

Notifications are mailed to the program by the training center each time an apprentice goes incomplete due to attendance. The training center will not make any changes regarding classes unless it's approved in writing by the program committee.

Every apprentice must bring tools and study materials to class before signing in on the "class sign-in sheet" for each class. The training center attendance procedures state that in case of a prolonged absence, 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, test scores, completed classes, progress evaluations, and classroom hours for the apprentices are recorded on the program's computer data base. A record of this information is also kept in the apprentice file.

(2) The apprentice files examined contain a consistent record of all RSI classes taken by the apprentice, absences related to school attendance, test scores, notice of advancement letters to employer, and disciplinary action for school attendance issues.

(b) *Recommendation*

(1) Coordinator and instructors should continue to provide updates to the program and the apprentices on how they are progressing in their required educational courses. Review curriculum and develop new courses to cover additional needs when needed.

(2) Program should continue to ensure that apprentice file folders contain the apprentice's training center attendance record, pass or fail records, final exam score, progress reports, upgrades, copies of advancement letters to employers and any disciplinary actions for school attendance issues.

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 is currently utilizing three training centers located in Compton, Gardena, and Colton California. The instructors conduct classes on a weekly schedule at the various training centers. The auditor spoke with Joe Wartelle, Facility Supervisor, and toured the Colton

training facility. The training center consists of 8 classrooms and 3 shop labs utilized for demonstrations and hands-on working booths to make special projects. All instructors have their teaching credentials or must obtain them within the first six months of employment. 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.

Unemployed apprentices attending RSI classroom training may be eligible for unemployment insurance benefits. Unemployment insurance telephone numbers are provided 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/dispatch apprentices to other employers and encourage the apprentices to train in all work processes.

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 contractors.

The auditor visited two job sites located in Yucaipa and Colton California. The Yucaipa job site is located at Crafton Hills College 11711 Sand Canyon Road, Yucaipa, CA 92399. The auditor found 4 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 another job site located at 400 North Pepper Street, Colton, CA 92324. The auditor found 3 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.

The interview with the apprentices and foremen confirmed there is a proper ratio of journeymen to apprentice and adequate supervision to train apprentices. All the apprentices interviewed stated they received OJT from a qualified journeyman or foreman and were satisfied with the training.

(a) *Findings*

(1) The auditor found that apprentices are being properly trained by qualified journeyrnen and employed at tasks defined within the work processes of the program standards.

(2) The job sites review noted a proper ratio of journeymen to apprentices and adequate supervision to train apprentices.

(3) The auditor found that of the files examined 85% showed apprentices advancing on schedule, 11% were one period off schedule, 2% completed the requirements and journeyed out, and 2% voluntarily resigned or were expelled from the program.

(4) All apprentices interviewed stated they were receiving the proper pay and benefits. Review of apprentice files confirmed pay and benefits.

(b) *Recommendations*

(1) The program needs to continue to ensure that the apprentices are being properly trained by a qualified journeyman and employed at tasks defined within the work processes of the program standards.

(2) The program should continue to periodically monitor employers to ensure proper ratio of journeymen to apprentices at the job sites.

(3) The program is doing an outstanding job of keeping apprentices on schedule. 85% of the apprentice files examined showed apprentice advancing on schedule.

(4) The program should continue to review and track apprentice records to ensure apprentices are receiving the proper pay and benefits.

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 auditor reviewed the required annual Self-Assessment and Program Improvement Plans for the years 2006, 2007, and 2008, the most recent being submitted on January 30, 2009.

(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 quarterly, unless more meetings are necessary to address certain issues. The meetings are conducted in the Colton office. An advance notice is sent out to all members and guests of the committee.

The program's rules and regulations state that this committee is a Labor/Management Co-Operative with three Labor Trustees and three Management Trustees. The committee also includes a DAS apprenticeship consultant and a Local Education Agency Representative.

The program standards state that committee will provide disciplinary procedures for apprentices and a provision for a fair and impartial hearing.

(a) *Findings*

(1) Our review of the committee minutes for the last 12 months showed that the committee had a record of disciplinary actions and committee minutes were sufficient in form and content. All disciplinary actions were reviewed and approved by the committee.

(b) *Recommendations*

(1) Continue to hold regular meetings and keep accurate committee minutes and records. Ensure DAS apprentice consultant is advised of the committee meeting well in advance.

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 program must remedy all deficiencies and be in full compliance with their apprenticeship standards. The program 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 program.

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 — May 26, 2009

Salvador Trujillo
Apprenticeship Auditor/Consultant
DAS, Los Angeles District Office

Date

From: Richard Edwards [redwards@ualocal364.org]
Sent: Tuesday, May 26, 2009 4:36 PM
To: Salvador Trujillo
Subject: RE: Audit Report

I'm sorry I haven't gotten to you sooner I've been sick.
I have received the report.
I am setting up meeting with all of the apprentices and I am going to outline the proper procedure for filling out blue books.
Additionally we are going to refuse them or send them back if the books are not in compliance.
Thanks

Richard Edwards
Business Manager, Financial Secretary/Treasurer
UA Local 364
WWW.ualocal364.org
"If I never surrender, I can never be defeated."