

STATE OF CALIFORNIA

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DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF APPRENTICESHIP STANDARDS**

AUDIT REPORT

California Apprenticeship Council Commissioners:

Enclosed herein is the Division of Apprenticeship Standards (DAS) audit of the following program sponsor:

San Diego and Imperial Counties
Slate, Tile and Composition Roofers
File Number: 07293
3737 Camino Del Rio So. Suite 202
San Diego, CA 92108

This Audit was conducted according to **Section 3073.1** of the **California Labor Code**.

The report includes the program's response to DAS.

If the recommendations require follow up action by DAS to ensure that they were adequately implemented, the status of the follow-up will be reported at future CAC meetings.

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SUMMARY

The Division of Apprenticeship Standards (DAS) presents its audit report concerning the San Diego and Imperial Counties' Slate Tile and Composition Roofers Joint Apprenticeship Committee (JAC) program; DAS file number 07293, (hereafter "Program") low graduation rates which were far below the fifty percent (50%) average graduation rate for the Roofing Industry. The audit was performed during May of 2007 and was conducted pursuant to California Labor Code §3073.1.

The committee hired a new Apprenticeship Coordinator in October of 2006. During the preliminary planning the new Apprenticeship Coordinator commented that the audit and resulting recommendations would be used as a learning tool and a positive step to help the apprenticeship program improve their graduation rates to an acceptable level.

During the audit preparation it was discovered that the actual number of registered apprentices reported to the DAS were not accurate. The number reported were 113 registered apprentices, when in fact the program actually only has 39 registered apprentices. The program and DAS took steps to correct the records and submitted the correct figures.

GRADUATION NUMBERS CORRECTED AND REPORTED

NUMBER OF REGISTERED APPRENTICES

DAS Records Based Upon Program's Submittals	113	According to Program	36
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PROGRAM COMPLETIONS

	2000	2001	2002	2003	2004	2005	2006	2007
DAS Records	1	2	0	0	1	3	1	1

FINDINGS AND RECOMMENDATIONS

As noted in the detailed report which follows, the audit team found that some specific actions are necessary to bring the program into compliance with their approved standards and legal requirements. The DAS expects that the implementations of the recommendations will help improve graduation rates. Prior to the audit the program made a staff change in October 2006, which resulted in actions to improve and maintain more accurate records.

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.

* The numbers for these years were not available.

AUDIT HIGHLIGHTS.....

Our review of the San Diego and Imperial Counties Slate, Tile and Composition Roofers Joint Apprenticeship Committee (JAC) program; Division of Apprenticeship Standards (DAS) file number 07293, (hereafter "Program") found that:

- Our review found that the program has not submitted a complete revision of standards since 1991.
- The program requires all apprentices to sign and confirm that they understand the programs Rules and Regulations. The apprentice files did not contain signed copies of this document.
- The number of registered apprentices for this program was incorrect.
- The program files did not contain consistent verifiable OJT work hours. The apprentice is required to complete an Apprentice Record Book (blue book) to track work processes and OJT work hours, but only a few files contain a copy of the blue book.
- There has been a change in the programs Local Education Agency (LEA) and it has not been approved by DAS.

INTRODUCTION/BACKGROUND

On May 30, 2007, the auditor(s) met with key administrative personnel, examined records, observed administrative activities, conducted a walk-through of the training facility and visited a job site in connection with the audit. The San Diego and Imperial Counties Slate, Tile and Composition Roofer Joint Apprenticeship Committee (JAC) program operates as a Labor/Management Cooperative with the Roofers Local 45. The programs funding mechanism comes from a separate apprenticeship trust fund that holds income from employer contributions.

The Daily operations, management and administrative functions are run by the Business Manager who is also the Apprenticeship Coordinator. A part-time volunteer occasionally helps out when needed.

Employers are approved to train when they have completed an Agreement to Train Apprentices, DAS-7 form and attest to the qualifications of their journeyman who will oversee the on the job training of the apprentices.

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

<u>Name of Occupation</u>	<u>Term of Apprenticeship</u>	<u>Number of Apprentices</u>
Roofer	39 months	36

Montgomery Adult School / Sweetwater Union High School District are the Apprenticeship Program's Local Education Agency (LEA).

The Roofers Apprenticeship is a 39 month program. Apprentices meeting the required advancement criteria progress through seven upgrade steps until completion. Training consists of 120 hours of related and supplemental training per year and 3900 hours of accumulated on the job training.

Continued on next page....

- Apprentice program files do not contain records of Required Supplemental Instructional (RSI) for classroom hours or attendance.
- The job site visit was unable to confirm that the apprentices are keeping track of their on the job training hours. The apprentice(s) did not have the record books with them at the time of the visit.

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 under the supervision of 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 programs' requirements.

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

METHODOLOGY

After completing an initial review of the programs' 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) There has not been a complete revision and approval of the standards since May 17, 1991. The last partial revision of the standards was on November 11, 2004.

(b) Recommendations

- (1) Submit a complete and current revision of the program standards to DAS - Due within 90 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 program sponsor has adopted rules and regulations specific to their program showing responsibilities of the apprentice and the committee. At the time of enrollment into the program the apprentices are given an orientation and given a handout which contains a description of the work, equipment and tools used, working conditions, a description of the program, and the rules and regulations of the apprenticeship committee.

There was a marked increase in attendance in the spring 2007 semester compared to the fall semester. This improvement was a result of enforcement of

the rules and regulations by citing the apprentices to the committee for disciplinary action for non attendance in school.

(a) Findings

- (1) This review found that the apprentice files did not contain signed copies to show that the apprentice had received, read, or understood this document.
- (2) The rules and regulations have discrepancies that need to be corrected regarding the term of the program. The contents were related to another roofing program. The coordinator explained that his plans were to review and edit the wording to better reflect this program.

(b) Recommendations

- (1) Review the rules and regulations to ensure that they comply with the existing standards – Due within 30 days
- (2) Distribute Rules and Regulations to all apprentices and have them sign a receipt. The apprentice file should contain this receipt – Due within 60 days.
- (3) Apprentices should be provided a copy of the Standards to review along with a copy of the Rules and Regulations when they are indentured in the program – Due within 30 days.
- (3) Review the rules and regulations for changes annually and include language for mandatory reporting of hours.
- (5) Continue to enforce the rules and regulations and record these actions in the committee minuetts and apprenticeship files.

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 review of the apprentice records reflected that overall apprentice records were not well maintained.

(a) Findings

- (1) It was determined prior to the audit that the programs active list of apprentices was not up to date. The program coordinator worked with the DAS consultant to reconcile the committees apprentice list with the DAS list, and as of May 30, 2007 this was accomplished. The number of reported registered apprentices was 113, when in fact the program actually has 39 registered apprentices.

NUMBER OF REGISTERED APPRENTICES

DAS Records Based Upon Program's Submittals	113	According to Program	39
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(b) Recommendations

- (1) The program will continue to keep the DAS informed of indentures, cancellations and completions in a timely manner.
- (2) The program should continue to monitor the apprentice 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 schedule, OJT records, periodic evaluations and work processes:

- The apprentice is provided with a record book to record their on-the-job training hours and school attendance hours. The record book contains a daily and monthly log for hours worked, a place to record work processes, a place for the supervisors' remarks on the apprentices' progress and signature of the supervisor.
- The record book also contains a class attendance record, grade, instructor remarks and the instructors' signature to verify attendance. The record book has instructions for the apprentice which include a statement that it is the apprentices responsibility to turn the record book in upon completion of each 600 hours worked.

(a) Findings

- (1) Overall OJT records were found to be inconsistent. Some records had all OJT data while others had few. It was discovered that some apprentices were only reporting one OJT task in the work processes. Apprentice Record Books on file often contained incomplete information and were not filled in properly.
- (2) The committee needs to devise a better method to track the apprentices work hour progress. Currently it is entirely up to the apprentice to turn in their Record Books for advancement after accrual of 600 hours. Instead, the apprentices work hours should be tracked monthly by the committee. The apprentices should be reviewed by the committee for lack of work hours progress as well as advancements. This should help to bring up the rate of apprentices completing the program.

(b) Recommendations

- (1) Include a copy of the work processes as outlined in the Standards A through D in the Record Book.- Due within 60 days.
- (2) Entries by apprentices need to be consistent with the work processes A through D – Due within 60 days.
- (3) Organize files to show the progression of the apprentice in school and on the job – Due within 90 days.
- (3) Provide training and instruction to the apprentices on how to properly record OJT hours and work processes – Due within 60 days
- (4) Develop a uniform system to keep and track apprentice OJT 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 90 days.
- (5) Devise a method of tracking apprentices who do not report work hours monthly – 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 the 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 has Related and Supplemental Instruction (RSI) and is using a Local Education Agency (LEA) which is Montgomery Adult School, from the Sweetwater Union High School District. Two other Apprenticeship Committees are currently using the same LEA. The course outlines as written by the JAC have been reviewed and approved by the school.

The Apprenticeship training program previously used the San Diego Community College District as their LEA and changed to the Montgomery Adult School.

Apprentices are required to attend classes twice a month for a total of 120 hours a year. The Apprenticeship Standards call out in article XI that RSI shall be not less than 96 hours a year.

The audit team visited the classroom and lab facilities and found them to be adequate to train Apprentice Roofers.

(a) Findings

- (1) The DAS has not given final approval for the Montgomery Adult School to act as the LEA. Course outlines do not match the classroom instruction hours. The course descriptions need to identify: hours per week, weeks per semester, semesters per year, and hours per year. The letter of acceptance from the LEA includes other training programs in addition to the Roofers JAC. The Apprenticeship Coordinator is working with the DAS Consultant to get these issues resolved.
- (2) The records of attendance and classroom hours for the apprentices are recorded on the apprenticeship coordinators computer data base, but no record of this information was found in the apprentice files.

(b) Recommendation

- (1) Resolve the issue surrounding approval of the LEA for related and supplemental training – Due within 60 days.
- (2) Apprentice file folders should contain the apprentices' attendance record, pass or fail records, upgrades, copies of advancement letters to employers and any disciplinary actions for school attendance issues – Due within 90 days.
- (3) Explore and continue to provide updates to the program and Apprentice(s) on how the apprentice(s) is 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.

Training of the job is conducted in both classroom instruction and at a hands-on area provided through the Montgomery Adult School. There is one certified instructor for this program.

Inspection was also made of the hands-on work area. There was a storage container on the site that contained the needed materials and mock-ups for hands-on training. The audit team found the hands on training facility adequate to train the apprentices. The instruction is done with good health and safety practices in mind.

(a) Findings

- (1) Inspection of the classroom was conducted by the audit team and found to be adequate.

(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 apprenticeship programs system of keeping the apprentices reasonably employed is by providing an out of work list. When apprentices become unemployed they contact the union hall and are placed on the list. The employers call in and request apprentices and the program dispatch them from the list in numerical sequence.

Apprentices who have previously worked for a signatory employer may solicit employment from those employers as well. Employers are encouraged by the Apprenticeship Coordinator to rotate apprentices to obtain hands on training in different work processes. There is no formal system to rotate apprentices from one employer to another employer.

Apprentices are counseled on the importance of being signed up on the out of work list when they become unemployed.

(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.

(b) Recommendation

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

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 task 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 programs' mechanism to keep apprentices reasonably employed is adequate.

The program suggested various job site locations to visit. Due to time constraints and the type of work that was being performed the UCSD Housing Project located at 1 Miramar Street, San Diego, CA. was selected. During our visit on June 13, 2007 we interview Ted Chavarin, job foreman. During the interview it was determined that he had the apprentices working within the scope of the trade and that the apprentices were supervised and working under the direction of qualified journeymen.

Three Apprentices were observed working at the trade applying waterproofing material and two apprentices were interviewed. Based upon their answers we can make the following conclusions:

- The apprentices are receiving the proper pay and benefits, adequate tools and materials were available at the work site to train the apprentices.
- There was a proper ratio of Journeyman to Apprentices and adequate supervision.

(a) Findings

- (1) Neither apprentice had their record books on them at the time of the interview but they assured us that they were logging in their hours and work training in the book.

(b) Recommendations

- (1) Ensure that the apprentices are recording their OJT hours and are correctly tracking their work hours and their work processes - Due within 60 days.
- (2) Develop a system to ensure that those apprentices who do not adequately report their OJT hours are identified and that appropriate action is taken on a consistent basis – Due within 60 days.
- (3) The program should continue to monitor job sites ensuring apprentices are adequately employed at the work processes,

recording OJT work hours, working under the direction of a journeyman, paid the proper wage rates 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 required annual Self-Assessment Review and Program Improvement Plan for 2006 was submitted on February 16, 2007. The DAS is sending reminders to the programs for the 2007 assessments due again by December 1, 2007.

(b) Recommendations

- (2) Use the Self-Assessment and Program Improvement Plan as a tool for setting goals for your program and adapt the listed changes during the previous 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.

Minutes from the meetings contained the following actions: cancellations, completions, apprentice resignations, show cause letters and apprentices cited before the committee for infractions of the rules and regulations and other apprenticeship business. Meetings have been attended by both management and labor representatives.

(a) Findings

- (1) The Committee meetings for the early part of 2006 were unable to be held due to a lack of participation from both management and labor. In October 2006, the committee was revitalized when new committee members were appointed from both management and labor. The committee has been meeting on a monthly basis with the exception of December 2006, this was cancelled due to the holidays.

(b) Recommendations

- (1) With the revitalization of the committee, ensure meetings continue to include active participation from both management and labor. This should include representation from the Local Educational Agency (LEA) representative – Due within 60 days.
- (2) Ensure that the DAS apprenticeship consultant is notified of committee meetings well in advance and the consultant will endeavor to participate in meetings when possible.

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.

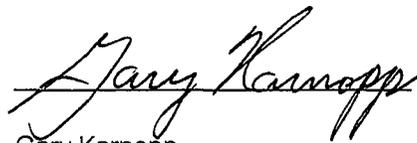
Within 10-days following the receipt of comments or the completion of the comment period, a final report will be submitted by the Chief of DAS to the California Apprenticeship Council.

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,



Gary Karnopp
Apprenticeship Consultant
DAS, San Diego District Office

7-18-07

Date

San Diego and Imperial Counties' Slate, Tile and Composition Roofers Joint Apprenticeship Committee

July 30, 2007

RECEIVED
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DIO SAN DIEGO

TO: Gary Karnopp, Apprenticeship Consultant
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FROM: Paul Colmenero, Apprentice Coordinator
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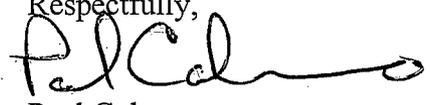
RE: Audit Report

In reply to the audit findings and recommendations, received on July 24, 2007 by the office of the San Diego and Imperial Counties' Slate, tile and Composition Roofers, Apprenticeship Program. Our Joint Apprenticeship Committee has reviewed the findings of this report, Though not agreeing 100%. We as a committee will comply with all recommendations suggested in the report, concerning the areas needed to improve upon, to comply with the state of California.

I'd like to acknowage the fact, that our committee and coordinator being new to apprenticeship. Was mentioned and considered in the report. In addition, I do thank the auditors, for acting in a professional and considerate manner during the audit. As a committee, we understand the importance and benefits of this audit to our Program.

If there are any questions, do not hesitate to call this office, 619-516-0192

Respectfully,



Paul Colmenero
Apprenticeship Coordinator