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STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL
RELATIONS
DIVISION OF APPRENTICESHIP
STANDARDS

AUDIT REPORT
For
Southern California Heat & Frost
Insulators & Asbestos Workers
File No. 09449

The Division of Apprenticeship 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 Southern California Heat & Frost Insulators & Asbestos Workers Joint Apprenticeship Training Committee (JATC) program; DAS file number 09449, (hereafter "program"). The program was randomly selected by DAS for audit compliance. The audit was performed from November 4, 2008, through November 10, 2008, and was conducted pursuant to California Labor Code §3073.1.

During the audit examination the Administrator/Training Director, Joey Gonzales commented that he accepted the position in May 2008, and indicated that he and his staff are committed to the success and improvement of the program and welcomed any recommendations and/or suggestions that would help the program achieve its goal of graduating skilled journeymen.

FINDINGS AND RECOMMENDATIONS

As noted in the detailed report which follows, the auditor found that some accounting procedures need to be implemented to bring the program into compliance with their approved standards and legal requirements. DAS identified some slight inadequacies relating to the program's compliance with their own standards and to the State apprenticeship laws and regulations. DAS found this program needs to implement some changes to meet apprenticeship requirements 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.

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

INTRODUCTION/BACKGROUND

The audit began on November 4, 2008, and was completed on November 10, 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 Heat and Frost Insulators and Asbestos Workers Training Committee (JATC) program operates as a Labor/Management Cooperative and the principal partners in the cooperative effort are the Associated Insulation Contractors of Western State, Southern California Chapter, a Non-Profit Corporation and International Association of Heat and Frost Insulators and Allied Workers, Local 5. The program has an Apprentice Trust Fund. The program's funding mechanism comes from employer contributions, Related Supplemental Instructional (RSI) Funds (Montoya Funds) and state prevailing wage training fund contributions.

The daily operations, management and administrative functions are supervised by Administrator Training Coordinator Joey Gonzales. The program employs an office manager and two clerical workers to maintain the apprentice files. The program also employs one full-time instructor and four part-time instructors. All the instructors have their California teaching credentials. The program office is located at 670 East Foothill Boulevard #3 Azusa, CA 91702. The Azusa training facility also serves as the program's main office and daily place of business. The program has 148 indentured apprentices and maintains all apprentice files at their main office.

The Southern California Heat and Frost Insulators and Asbestos Workers Joint Apprenticeship Committee term of apprenticeship is 6000 on-the-job (OTJ) hours within a 48-month period. Training consists of 640 hours of related supplementary instruction (RSI) and 6000 hours of accumulated on-the-job training (OJT). Apprentices meeting the required advancement criteria (160 RSI and 1500 OJT hours per year) progress through 4 upgrade steps until completion. The program's Local Education Agency (LEA) is Rio Hondo Community College.

The Related and Supplemental Instruction is conducted at the program's training center which is located 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's standards, an Apprentice Daily Work Slip (program's version of DAS Form 103) and a class schedule.

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.

AUDIT HIGHLIGHTS.....

Our review of the Southern California Heat and Frost Insulators and Asbestos Workers Training Committee (JATC) program; Division of Apprenticeship Standards (DAS) file number 09449, (hereafter "program") found that:

- Audit review found that although the program submitted various revisions to its approved standards the program has not submitted a complete revision to its standards since October 1, 2003.
- The program files examined contained an "Apprentice Daily Work Slip," program's version of DAS Form 103. The Work Slip is completed by the apprentice and contains a daily total of OJT hours worked along with a breakdown of the various work processes worked within the month. The apprentice files examined did not contain a verifiable grand total of OJT hours or grand total of the various work processes.
- Work processes are not consistent with program apprenticeship standards. Apprentice Daily Work Slip contains 9 various work processes. Programs DAS approved standards contain 4 various work process.
- Apprentice files examined contained copies of school absences, evaluations, progress reports, final test scores, and classroom reports.
- Apprentice files examined did not contain a verifiable grand total of RSI hours or individual classes completed by apprentice.

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 papers to conduct the interview
4. Confirm the location where records are maintained
5. Conduct a random review of 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 a complete revision of its standards since 2003.
- (2) The DAS approved program standards state 4 various work processes. The program is requiring apprentices to complete 9 various work processes.

(b) Recommendations

- (1) Submit a complete revision of the Committee Standards. The revision should include changing standards to encompass the additional work processes or change the required work processes to current DAS approved standards. - Due within 90 Days.
- (2) In the future review and update standards as needed or whenever any material changes are made to the program.

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. 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 contained signed copies/receipts to acknowledge the apprentice received, read, and understood the rules and regulations.
- (2) The rules and regulations are reviewed by the Committee and updated when needed. The Committee applies the rules and regulations in a fair and consistent manner. Actions taken by the Committee are reflected in the meeting minutes and apprenticeship files.

(b) Recommendations

- (1) Continue enforcing rules and regulations in a fair and consistent manner.

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 audit it was discovered that the actual number of registered apprentices reported to the DAS was not accurate.

(a) Findings

- (1) The program's numbers of registered apprentices were incorrect. The number of registered apprentices based upon DAS records is 160. Program records indicate they have 148 indentured apprentices.

(b) Recommendations

- (1) The program will keep the DAS informed of indentures, cancellations and completions in a timely manner - due within 90 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 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 apprentices' schedules: OJT hours, periodic evaluations and RSI classroom hours. Each apprentice receives normal upgrades in the period (every 12 months) and wage increases by meeting the following requirement:

- Satisfactory completion of required RSI classroom hours. Apprentices are scheduled for 80 hours of classroom training every six months for a total of 160 per year.
- Accumulation of 1500 OJT hours from an approved contractor. Program utilizes time sheet records from approved contractors to track apprentice work hours.
- Satisfactory passing (70% or higher) of RSI class final exam, in conjunction with satisfactory progress/evaluation reports from instructor.

Program provides the apprentice with a monthly Apprentice Daily Work Slip record sheet to document and record OJT hours and work processes. The sheet contains a daily and monthly log to record hours worked in the various work processes; the record sheet has a place for the supervisor's signature and a list of the various work processes. The apprentice is required to turn-in his Daily Work Slip every month via mail, office visit, or when reporting to school. If apprentice is current with RSI hours and has the required OJT hours he/she is advanced to the next level of training and receives a wage increase.

Audit files examined had copies of the Apprentice Daily work Slip signed by the supervisor and itemized by the various work process hours. Additionally files contained apprentice test scores, attendance records, and evaluation and progress reports. Files examined did not contain a verifiable grand total of all OJT hours or RSI hours.

(a) Findings

- (1) The program is not utilizing the Apprentice Daily Work Slip or any other record keeping system to track and verify apprentice OJT hours. Apprentice files examined did not indicate total OJT hours completed by apprentice or total hours of the various work processes.
- (2) Program is not accurately tracking apprentice RSI hours. Apprentice files examined did not indicate total RSI hours completed by apprentice.

(b) Recommendations

- (1) Develop an accounting system to accurately compile total OJT hours and total hours worked within the various work process hours. Keep information in apprentice file. – Due 90 days
- (2) Develop an accounting system to accurately compile total RSI hours taken by apprentice. Keep information in apprentice file. – Due 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 a Local Education Agency (LEA). The LEA is Rio Hondo Community College located at 3600 Workman Mill Road Whittier, CA 90601. The course outlines as written by the program have been reviewed and approved by the LEA.

The apprentices are required to attend 80 hours of instruction two times per year which are scheduled twice a year for a total of 160 hours per year for 4 years (640 total hours). Each student is issued a calendar with the schedule of classes. Classes are held twice a week (on weekends) and start promptly at 7:00 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 who are absent from a class more than three days will be dropped from class. Apprentice will then be required to successfully repeat the class from the beginning in the next semester of instruction and pay raise will be extended by six months. In addition, apprentice will be cited to appear

before the Committee at their next meeting to show cause why he/she should not be dropped from the program or have any disciplinary action taken against them.

Every apprentice must bring tools and study materials to class before signing in on the "class sign-in sheet". 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) Apprentice files examined did not contain a verifiable total of all RSI hours completed by apprentice.
- (2) The apprentice files examined contain a consistent record of all absences related to school attendance, test scores, copies of advancement letters to employer and apprentice, and any disciplinary actions.

(b) Recommendation

- (1) Develop an accounting system to accurately compile total RSI hours taken by apprentice. Keep information in apprentice file. – Due 90 days.
- (2) Instructors 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, as required.

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 1 full time instructor and 4 part time instructors. All instructors possess California teaching credentials. During the visit, classes were not in session at this training center. The program is currently utilizing one training center located in Azusa California. The instructors conduct classes on a weekly schedule at the training center. The auditor spoke with one instructor and toured the Azusa training facility. The training center is located next to the program. The training center consists of 4 large classrooms and 4 shop labs utilized for demonstrations and hands-on working projects. Each apprentice must complete a variety of shop projects, score 70% or higher on the final exam, 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.

Unemployed apprentices attending 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 reasonably 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 giving the apprentices an opportunity to work in all the various 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

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 various 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 a job site located in Los Angeles California at the (Los Angeles Police Department) and found 2 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 (Garland Building) job site located in Los Angeles 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.

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 stated that he receives the proper pay and benefits and attends OJT classroom training. Auditor confirmed that each apprentice writes in the total hours of OJT training on his apprentice daily work slip, broken into the various work processes. Apprentices interviewed had their record sheet in their possession or in their car or at home. The apprentices verified the apprentice daily work slip is signed by the job site foreman/supervisor validating the work processes and OJT work hours. All apprentices interviewed stated they had to turn in the record sheet to the program once a month and all knew the various ways (mail, office visit) they could turn it in. Of the four apprentices interviewed three stated that they turned in their apprentice daily work slip (monthly) when they attended RSI class and one mailed his in.

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) Apprentices are performing the various tasks listed within the work processes of their trade. Apprentices are receiving the proper pay and benefits and are advancing on schedule. Apprentices are properly itemizing hours by the various work processes and supervisors/foremen are signing and verifying the apprentice daily work slip.
- (1) The auditor found that the apprentices were filling out the apprentice daily work slip in a timely manner and submitting it to the program on a monthly basis.

(b) Recommendations

- (1) The program should continue to ensure apprentices are recording OJT hours and are correctly tracking hours within the individual work processes. The program should continue to provide training and instruction to the apprentice and the employer(s)/supervisor(s) on how to properly record OJT hours and work processes.
- (2) The program should continue to ensure each apprentice turns in his/her record sheet to the program (monthly) and continue to keep a complete and signed record sheet in each apprentice file.

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 31, 2007.

(b) Recommendations

- (1) Continue to submit the self-assessment review and program improvement plan in a timely manner.

- (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 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 committee meeting minutes for the past year. The subcommittee meetings (disciplinary) are held as needed and the full committee (business meeting) is held every quarter. The meetings are conducted in the Azusa office. An advance notice is sent out to all members and any guests of the committee.

(a) Findings

- (1) The program committee is a Labor/Management Co-Operative and has 3 labor representatives and 3 management representatives. The committee also includes one advisor apprenticeship coordinator and one advisor local education agency representative. All advisors act without vote. All disciplinary actions are reviewed by the committee.
- (2) Our review of the committee minutes for the last 12 months showed that the committee had a record of disciplinary actions.
- (3) The committee minutes were sufficient in form and content.

(b) Recommendations

- (1) Continue to hold regular meetings and keep accurate committee minutes and records.
- (2) Continue to ensure DAS apprenticeship consultant is advised 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)(l), 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.

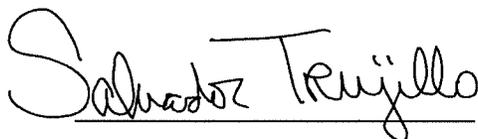
Within 10-days following the receipt of comments or the completion of the comment period, a final report will be submitted by the Chief of DAS to the California Apprenticeship Council.

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
Apprenticeship Consultant
DAS, Los Angeles District Office

January 15, 2009

Date

JOINT APPRENTICESHIP TRUST

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January 14, 2009

State of California
Department of Industrial Relations
Division of Apprenticeship Standards
455 Golden Gate Avenue, 10th Floor
San Francisco, CA 94102

Re: Audit Report November 4, 2008

Mr. Trujillo:

After reviewing the audit report for November 4, 2008, the Joint Apprenticeship Trust will comply with the audit findings and will implement any changes that have been recommended in order to meet the Apprenticeship requirements to retain State approval.

If you have any questions, feel free to contact this office at 626-334-6884.

Thank you,

A handwritten signature in black ink, appearing to read 'Joey Gonzales'.

Joey Gonzales
Administrator and Training Director
For Apprenticeship & Abatement
Training Trust

cc: JAC Agenda