

Comments Received in the comment period for 8 C.C.R. § 230.1

Comments from Absolute HR Consulting & Services

Questions/Revisions in regards to what will be **required** to be completed on the DAS142 form.

- Proposed revision to text in bullet #2 “Facsimile number **OR** Email address for applicable apprenticeship committee.” Several programs have eliminated fax numbers.
- Proposed revision to text in bullet #3 “Facsimile number **OR** Email address for Contractor requesting dispatch.” Electronic communication is common practice and fax lines are not utilized as often.
- A subcontractor may not have all of the information, such as the PWC Project Number, when it falls under the legacy Labor Compliance Programs. Several programs have rejected DAS142 submissions as “Noncompliant” if a PWC Project Number is not listed. What will be acceptable when in this situation?

Thank you,

Kristine O’Dell
Absolute HR Consulting &
Services

Comments from The California Association for the Advancement of Apprenticeship and Training ("CAAAT")

The California Association for the Advancement of Apprenticeship and Training ("CAAAT") respectfully submits the following comments regarding the proposed changes to 8 C.C.R. § 230.1. By way of background, CAAAT's members include the following state-approved unilateral apprenticeship and training programs throughout the State of California:

- ABC Northern California Chapter
- ABC Southern California Chapter
- ABC San Diego Chapter
- Air Conditioning Trade Association
- Associated General Contractors Of San Diego, Inc.
- California American Fire Sprinkler Association
- Independent Roofing Contractors of California
- Masonry Industry Training Association
- Plumbing Heating-Cooling Contractors of the Greater Sacramento Area
- Western Electrical Contractors Association

CAAAT and its members have a long-standing relationship with the California Apprenticeship Council and the Division of Apprenticeship Standards. CAAAT's members and their member contractors will be directly affected by the proposed amendments to 8 C.C.R. § 230.1, if implemented, and are concerned about the impact that the adoption of said amendments would have on the apprenticeship community.

CAAAT's primary objection is to the following suggested revision to 8 C.C.R. § 230.1 (see italicized language):

The DAS Form 142 or written notice shall include the following information, but shall not require information not enumerated in Section 230.1: ... 4) *Project Information: PWC Project Number, Contract Number, Total Contract Amount, Sub-Contract Amount, Name of the Project, Address...*

Specifically, CAAAT is concerned that contractors will not be able to provide the above listed information on projects that have not been registered with the Department of Industrial Relations in accordance with Labor Code section 1773.3 and, as a result, may have their DAS 142 forms rejected as incomplete. CAAAT also does not believe that said information is necessary for apprenticeship programs to be able to effectively evaluate and fulfill the requests for dispatch that they receive from contractors. CAAAT is thus concerned that requesting such information, particularly on projects where the information does not exist or is not publicly available, will serve to impede the timely dispatch of apprentices to public works projects.

Accordingly, CAAAT requests that the italicized language above be deleted from the proposed regulations. Alternatively, CAAAT requests that the below highlighted language be added to the proposed amendment:

4) Project Information: on projects which have been registered with the Department of Industrial Relations in accordance with Labor Code section 1773.3, PWC Project Number, Contract Number, Total Contract Amount, Sub-Contract Amount ...

Thank you for your consideration.

Sincerely,

Tracey Barrett
CAAAT President