



**CALIFORNIA APPRENTICESHIP COUNCIL 2025**  
**FOURTH QUARTERLY MEETING**  
**RULES AND REGULATIONS COMMITTEE**  
**MINUTES**

**Wednesday, November 5, 2025**  
**2:00 p.m.**

**Acting Chairperson Larry Hopkins**

**I. Call to Order/Roll Call**

- a. Chairperson Richard Harris absent, Commissioner Hopkins volunteered and acted as an alternate Chairperson. The meeting was called to order at approximately 2:45pm due to the delayed adjournment of the Related Supplemental Instruction (RSI) Subcommittee Meeting.
- b. DAS Chief Adele Burnes conducted the roll call.
  1. Members Present: Larry Hopkins, Mark Burri (remote), Frank Quintero, Jack Buckhorn, Chuck Poss, Hugo de la Torre, Randall Chenworth and DAS Chief Adele Burnes.
  2. Members Absent: Richard Harris and Jason Rafter.

**II. Review/Approve Previous Minutes**

- a. Members approved the meeting minutes from August 14 in San Diego.

**III. Old Business – None**

**IV. New Business – Proposed changes to section 212.2 of the California Code of Regulations**

- a. DAS Chief Burnes presented proposed edits to section 212.2.
  1. Purpose of edits: To clarify when 30-day public posting is required for program standard changes, and when de minimis / administrative adjustments are processed without posting.
  2. Under section 212.2(g)(1), new programs; and amendments that add new

occupations, add new work processes, revise existing work processes, or expand geographic area to include new labor market areas—these follow the application and approval process in §212.2(A–J) and trigger public posting.

3. However, under section 212.2(g)(2), there is a non-exhaustive list of items outside section (g)(1) that would be processed by the Chief of DAS without public posting, provided they do not implicate (g)(1) triggers. Examples include program contact info, committee changes, wage updates, probationary period changes, applicant selection criteria, term length/approach, RSI/LEA details, DAS document requirements, and code/taxonomy adjustments.

b. Commissioner Discussion

1. Commissioners discussed ensuring the text distinguishes purely taxonomic updates (e.g., renumbering or DOL changes) from changes that effectively alter occupations or work processes, which must be posted under (g)(1).
2. Commissioners and counsel noted (g)(2)'s role as a teaching/interpretive section that illustrates de minimis changes and reduces unnecessary postings for minor edits (e.g., typos), while preserving (g)(1)'s supremacy if substantive changes are present.
3. To avoid redundancy (e.g. “does not conflict with G1” language appearing twice), suggestions included inserting “non-substantive” before “adjustment(s)” for occupational title/O\*NET/SIC references. Eileen Goldsmith provided a public comment specifically recommending this placement to streamline the paragraph.
- c. Commissioner Buckhorn made a motion to insert “non-substantive” before “adjustment(s)” in (g)(2) for “occupational title, O\*NET code, or standard industrial classification,” to retain (g)(2)'s framing as a non-exhaustive list of changes outside (g)(1) that do not require posting. This motion passed unanimously. The Subcommittee thus decided to advance the amended § 212.2 language to the full CAC following legal review, and properly agendize the recommend rule change in the next CAC meeting (1<sup>st</sup> Quarterly Meeting of 2026).

V. Public Comment

- a. Don Black (WECA) asked if MITC changes lead to required posting of the corresponding adjustment of work processes. Chief Burnes responded by stating the MITC statute/regulations govern the MITC formation/approval and set compliance timelines; while MITCs themselves go before the CAC, changes to work processes to conform to MITCs would constitute work process revisions and—under the presented § 212.2 framing—would require posting. The current § 212.2 draft does not explicitly reference MITCs, and the subcommittee may consider future clarifying edits.

- b. Ben Rivera (Sheet Metal Workers Local 104 Training Program) asked how ONET codes are assigned and how the prior DOL/DOT codes translate; staff confirmed DOL assigns ONET codes, and DAS works consultatively with sponsors to align codes—taxonomy updates alone should not alter work processes.
- c. Jerry Elliott (Counsel for Southern California Pipe Trades) supported ensuring MITCs closely match work processes to prevent overlap/conflict.

VI. Adjournment

- a. The meeting adjourned at approximately 3:21pm.