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Div. of Apprenticeship Standards  
P. O. Box 420603  
San Francisco, CA 94142-0603

# AUDIT REPORT

California Apprenticeship Council Commissioners:

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

International Association of Bridge, Structural, Ornamental and Reinforcing Ironworker  
Local 377 San Francisco  
File Number: 07646  
3130 Bayshore Road  
Benicia, CA 94510

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.

DEPARTMENT OF INDUSTRIAL RELATIONS  
DIVISION OF APPRENTICESHIP455 Golden Gate Ave. 10<sup>th</sup> Floor  
San Francisco, CA 94102  
Phone 415.703.4920  
Fax 415.703.5477**International Association of Bridge, Structural,  
Ornamental and Reinforcing Ironworker  
Local 377 San Francisco JATC****Audit Summary****Background**

The International Association of Bridge, Structural, Ornamental and Reinforcing Ironworker Local 377 San Francisco JATC, DAS file # 07646 (hereafter "Program") was selected to be audited by DAS based upon the fact that the program's graduation rate was below the fifty percent (50%) average graduation rate for the ironworkers trade in California. The audit was performed during February of 2007 and was conducted pursuant to California Labor Code §3073.1.

**Findings and Recommendations**

As noted in the detailed report which follows, the audit team found the program to be in compliance with their approved standards and legal requirements. The audit team did find that, in the areas of on-the-job training hours reconciliation with work processes, apprentice files, granting of wage increases, and completion of the training, increased documentation should be required.

Detailed findings and recommendations are included in the following report. With each of these findings a recommendation was presented to the Coordinator to assist with appropriate corrective action. The audit report includes recommendations for improvement. DAS will visit the program in the future to verify compliance with the recommendations. DAS audit procedures allow the sponsor to respond to the recommendations and their response will become a part of the formal report.

**INTRODUCTION**

The International Association of Bridge, Structural, Ornamental and Reinforcing Ironworker Local 377 San Francisco JATC, file # 07646, Apprenticeship Program was audited pursuant to Section 3073.1 of the California Labor Code.

The audit began February 28, 2007 and was completed on April 6, 2007. The auditor(s) met with Coordinator Dana Fairchild. The auditor(s) examined records, observed administrative activities, toured the training facility, "sat-in" a classroom session and visited a job site in connection with the audit.

One hundred seven (107) files were requested and all one hundred seven (107) files were provided. Based on these observations and audit activities, we have concluded

that the program is operating within State apprenticeship laws and regulations. We have identified some inadequacies of the programs' compliance with their own standards, in addition to State apprenticeship laws and regulations. We have found that this program needs to implement modest changes to improve the oversight of their apprentices as they progress through the program.

## **BACKGROUND**

Daily program operations, management and administrative functions are conducted at the Benicia Training facility located at 3150 Bayshore Road, Benicia, CA 94510. There are 630 signatory employers, of which this program shares, through a collective bargaining agreement, with Arizona, Nevada and all of California. The program is funded through California Field Ironworkers Apprenticeship and Journeyman Retraining Trust Fund that holds income from employer contributions, and State prevailing wage training fund contributions.

There is Related and Supplemental Instruction (RSI) and San Leandro Unified School District is the Local Education Agency (LEA). After indenturing, which includes a letter of sponsorship from a signatory employer, the completion of indenturing paperwork, a signed statement of understanding and receipt of the program's rules and regulations, apprentices are assigned to attend eight (8) Saturday only classes. These classes are continual, which allow the program and apprentice to begin at any Saturday, until the eight courses are completed. Apprentices are instructed to maintain records of their on-the-job-training hours. The program provides quarterly work and training record card, at no cost, designed for recording on-the-job training hours as it relates to the completion of. Work processes.

- The Field Ironworker Apprenticeship has concurrently a 3-year program consisting of 3,600 hours of on-the-job training for apprentices indentured on or before July 1, 2004 and 4-year program consisting of 5,600 hours of on-the-job training for apprentices indentured after July 1, 2004. The Standards call for supplemental instruction of not less than 160 hours per year. Apprentices are advance twice a year, March and September, upon completion of RSI and OJT hours with the JATC approval.

## **SCOPE AND FOCUS**

The principle audit objective is to ensure that the program is complying with their standards, that all on-the-job training is performed by journeymen, 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, systems and capabilities to provide and deliver the on-the-job training and related and supplemental instruction. The programs' policies and procedures were reviewed to determine if they support the programs' approved Apprenticeship Standards.

## **METHODOLOGY**

After completing an initial review of the programs' standards and records on file with the DAS, an audit plan was established that included the following steps:

1. Notifying the programs at least 14 days in advance of our intent to audit.
2. Preparing an entrance interview.
3. Organizing all other working papers necessary to conduct the audit.
4. Confirming the location of the place where the records are kept and maintained.
5. Setting the time and date of the meeting.
6. Scheduling a work site visit.

One hundred seven (107) files were requested for review and provided. Fieldwork also included visiting a work site to observe working conditions and conduct interviews with apprentices and supervisors. The Training facility was observed, reviewed; and a classroom session was "sat-in" by auditors.

## **AUDIT FINDINGS AND RECOMMENDATIONS**

### **1. STANDARDS:**

**Objective:** To determine whether the program is submitting periodic revisions to their standards and if standards are reasonably current.

**Findings:**

- a) There has been a complete revision of the standards. The original standards for the International Association of Bridge, Structural, Ornamental and Reinforcing Ironworker Local 377 San Francisco JATC were approved on July 1, 1953. The last revision of approved standards was on July 1, 2004. The last wage revision (DAS-24) was approved on July 1, 2006.

The DAS review found that all standards were reasonably current.

**Recommendation:** None

### **2. RULES AND REGULATIONS:**

**Objective:** To determine if the program has adequate rules and regulations, is implementing them as required, and providing a copy to the apprentices.

**Findings:**

- a) The Committees has adopted rules and regulations specific to their program.
- b) After enrolling, apprentices embark on an approximate 1 ½ hour indenture process where they receive rules and regulations booklet designed for Ironworkers Apprentices registered in the International Association of Bridge,

Structural, Ornamental and Reinforcing Ironworker Local 377 San Francisco JATC. The rules booklet covers several different areas including the major responsibility of the JATC, RSI training, On-the-Job training, and General rules and regulations. The booklet contains a "test" page, which serves, both, as a receipt and acknowledgement that the apprentice has an understanding of the rules and regulations. The files contained signed copies of this receipt.

The indenturing process continues with the review and completion of the Apprentice Agreement (DAS-1), Application, Drug & Alcohol policy, upcoming classes, financial obligations, safety video Identification photo, employment process, and questions/answer opportunities.

- c) Apprentices are cited for failure to follow the rules and regulations. The apprentice is given due notice by mail, to appear before the JATC and give explanation. The cite letter is generated by the coordinator, Dana Fairchild. The disciplinary hearings are heard, as part of the regularly scheduled monthly JATC meeting which are held either at the Local Union hall in San Francisco or at the Training facility in Benicia. Each location is well known by the apprentice due to the unique functions that are generated at each facility. Such appearances are mandatory when requested. Non-appearance, unless excused by the committee, is sufficient grounds for recommendation to the State Administrator of Apprenticeship for cancellation from the program for failure to comply with a committee directive.

**Recommendation:** None

### 3. **ACTIVE APPRENTICES AND CANCELLATIONS:**

**Objective:** To determine if the program is monitoring apprentices as they enter and flow through the programs, and to determine if the program is maintaining accurate records of both active and cancelled apprentices.

**Findings:**

- a) It was determined prior to the audit that the program's active apprentice list was not up to date with DAS records. The program was contacted and began working with its DAS consultant to reconcile the records. On January 30, 2007, the program was sent an updated list of active apprentices and asked to provide a letter of attestation for updating (active, cancel and completion) the program. On March 7, 2007, the DAS received the updated list with a letter that was signed by the coordinator, Dana Fairchild, attesting, under penalty of perjury, that the information provided was true and correct, to the best of his knowledge. The DAS San Francisco Field Office requested further declaration stating the re-issuance of trade certificates being that if the trade certificate were recovered, it would be returned back to DAS. This further attestation was received, under Dana Fairchild's signature on April 5, 2007. DAS proceeded to update the program's apprentice list. This function was completed on or about April 7, 2007

**Recommendation:**

The program(s) should keep the DAS informed of cancellations and completions every 30 days.

*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):**

**Objective:** To determine if apprentices are progressing on schedule, that the program is maintaining adequate OJT records, and to determine if the program has adequate systems in place to ensure that apprentices are covering all the work processes.

**Findings:**

- a) There were records of OJT hours in the reviewed apprentice files. The program has a status report which details the classes and hours that the apprentice has completed, the total number of OJT hours that the apprentice has completed and the period of apprenticeship
- b) There is a mechanism or system to keep track of the OJT hours worked by the work processes covered. The program provides an "Apprentice Quarterly Work and Training Record" card to the apprentice and is collected quarterly by the coordinator. The card is to have the apprentice's signature with a verification signatory from the job's Forman. The cards are being collected by the coordinator but were not included in the file of the apprentice. Thus, the auditors were unable to determine if all apprentices were in compliance.

**Recommendation:**

- a) Develop a system that allows the recording of the OJT hours spent in each Individual work process into the status report and make this information available for the JATC to take corrective action, if needed.
- b) Convey the importance of timely and accurate reporting.
- c) Keep a record of the OJT hours per work process in each apprentice file.
- d) Develop a mechanism to track and/or identify apprentices who have not

Submitted timely OJT hours. The program should follow and enforce their Rules and Regulations and cite apprentices as required when violations occur.

- e) Immediately evaluate the apprentices to ensure that they are receiving proper training and supervision in all required work processes.

*Section XVII of the program's standards, and Section 3073.1, 3076, 3078(e) of the Labor Code, and Sections 210, 212(a) (4), (b) (9), (c) (2) (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.*

#### 5. **RELATED AND SUPPLEMENTAL INSTRUCTION (RSI):**

**Objective:** To determine if apprentices are progressing on schedule, attending classes, covering the entire course of study, and to ensure the program is maintaining accurate records with adequate systems in place to provide the training.

#### **Findings:**

- a) The program(s) does have related and Supplemental Instruction (RSI) provided under collaboration with the San Leandro Unified School District is the Local Education Agency (LEA). According to the Coordinator, the program offers "an introductory eight (8) week Saturday course as an introduction to the trade. The apprentice is then scheduled to complete 13 core classes over the course of their apprenticeship. The classes are offered under a semester system and, after completion of the Saturday classes, the classes are structured in a Monday-Friday format. The apprentices are not compensated for the RSI, but can apply for unemployment benefits.
- b) The program's records are very accurate and detailed. Status reports for each apprentice is kept by the coordinator and placed in the file. Instructors are required to take attendance and each apprentice is required to sign-in, at least, twice a day.
- c) During the review of the programs past agenda minutes (one year), there was no record of attendance by the LEA representative.
- d) The auditors had the opportunity to "sit-in" during the Reinforcing 1 class. The auditors were very impressed with the interaction of the apprentices with the instructor and the manner in which the instructor kept all apprentices active and engaged

**Recommendation:**

- a) Continue to invite the LEA representative and encourage their participation.

**6. PROGRESS RECORDS, PERIODIC ADVANCEMENTS AND EVALUATIONS:**

**Objective:** To determine if apprentices advance on schedule, receive periodic evaluations and to ensure the programs have adequate records and systems in place to monitor progress and keep apprentices on schedule.

**Findings:**

- a) Progression is determined, jointly, by the JATC with a recommendation by the determines The JATC, with a recommendation from the coordinator, grants how much credit is given when an apprentice enters the program The employment history, past participation, recommendation from sponsoring employer, are a few of the factors reviewed when determine credit. The JATC, with a recommendation from the coordinator, decides when the apprentice advances, after meeting pre-determined OJT hours and RSI classroom hour's completion. . The JATC, with a recommendation from the coordinator, submits to DAS a request for a trade certificate when the apprentice(s) have completed all requirements of the program.
- b) In the 107 records reviewed, there was evidence of documentation for upgrades in the files, including support documentation for completion certificates. However, the evidence was not complete. For example, there was missing documentation that failed to show the full progression of upgrades. Some records had evidence of progression for periods 1,2,3,5 &7, but were missing for periods 4 &6. In addition, the completion letter was not present in all records. At least, 75% of the records showed evidence of this lack of documentation.
- c) There was evidence of apprentices not receiving pay advancements or completion of program at the time when such accomplishments were attained. The program grants advancements twice a year, March and September, irrespective of advancements occurring between these periods.
- d) The program does not have an adequate means of evaluating apprentice at the work site. The JATC and the coordinator rely upon anecdotal evidence supplied by business agents or employers. The type of practice is typical know as "word of mouth" and is a means that the coordinator states has been successful. However, the type of evaluation does not supersede a written statement on how well or not well; an apprentice is grasping the trade.
- e) The coordinator is instrumental in monitoring or reviewing apprentice records, on-the-job training activities, related and supplemental instruction, or advancements.

### Recommendations:

- a) Establish a process to identify apprentices who are not progressing on schedule so that they can be counseled early and consistently throughout their training.
- b) Establish a form and process to document apprentice's evaluation at the worksite. ~~This document should include, but not limited to, quality of work,~~ quantity of work, job knowledge, getting long with other. This document should be signed by the apprentice and job site representative and reviewed by the coordinator. Any below average scores or ratings should be brought to the JATC attention for reviewed and, if necessary, appearance by the apprentice to the JATC.
- c) Establish remedies to insure timely advancements, at time of accomplishment.
- d) While not mandatory, it would be desirable to supply each apprentice with a quarterly status on actual vs. planned completion of both RSI and OJT hours.

*Section 208, 212 (a) (5) (7) (8), (b) (9), (c) (6) (8) (9) of the California Code of Regulations. The program(s) must have a procedure for recording and maintaining accurate records, and a procedure for periodic review and evaluation of progress.*

### 7. MECHANISM TO KEEP APPRENTICES REASONABLY EMPLOYED:

**Objective:** To determine if apprentices are kept reasonably employed, and to ensure the program has adequate systems in place to rotate apprentices so they may cover all the work processes, and to provide apprentices with continuing employment in the event of layoff.

#### Findings:

- a) The apprenticeship program does have a system of keeping apprentices reasonably employed through a job referral system. In the event of a layoff, the apprentice has been informed that he/she is to immediately go the union hall and inform the union hall of the layoff. The apprentice, is then, placed on a "out of work" list and called for employment, when there name is called.
- b) As noted previously (item #4 On The Job training) the program does have a means to track the OJT hours as it relates to the completion of the work processes, however, without this timely c documentation, an apprentice may find him or her self completing all the work processes, but having a concentrated trade specific skill. Such as, only being able to do rebar work. There is only one active employer and the availability of work hinges on the work flow of the employer.

**Recommendation:**

1. Establish a process to review work process and, if necessary, move the apprentice to another employer or have the employer change the job assignment, to insure full exposure and training in all the 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. TRAINING CENTER:**

**Objective:** 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.

**Findings:**

- a) The program does have a training facility located in Benicia, Ca. The training facility is newly built and became open for instruction and training in October 2006. The facility has "state of the art" classrooms, welding bays, and indoor and outdoor space for mock-up demonstrations. It is noted that the facility has interactive computers for the instructor at each classroom that allows the instructor to use power point and an illustrator for interaction with the apprentices.

**Recommendation:** None

**9. JOB SITE VISIT:**

**Objective:** The job site visit offers an opportunity to view a job in progress, observe the work that is being done, and provides the opportunity to discuss the operation of the program with the apprentice. It enables direct contact with the apprentice to determine:

- 1) If the apprentice is performing the various tasks listed within the work processes of their trade
- 2) If advancements are made on schedule
- 3) if the apprentice is receiving the correct pay and benefits
- 4) If the apprentice is kept employed on a reasonably continuous basis
- 5) If the programs' mechanism to keep apprentices reasonably employed is adequate.

## **Findings:**

- a) Auditors visited the San Francisco Municipal Light rail Maintenance yard project located at the South of Market Street District in San Francisco on April 6, 2007. Three apprentices (Kathy DeMartini, Harold Kuer and Jose Montoya) were observed doing various tasks. Ms. DeMartini was observed spotting a forklift operator as he back-up the forklift. She also, sorted and moved materials. Mr. Montoya was observed working with Ms. Martini in arranging and sorting material and preparing himself to connect together some iron bars, some 20 feet in the air. Mr. Kuer was observed assisting an operating engineer in getting his boom stabilized and secured. He then, assisted in getting a piece of iron ready to be lifted onto the structure. All apprentices were under the guidance of, at least, six journeymen for each apprentice.

The apprentices were interviewed with the following results:

- 1) The apprentices are receiving the proper pay and benefits.
- 2) Adequate tools and materials were available at the work site to train the apprentices.
- 3) There was a proper ratio of Journeymen to Apprentices and adequate supervision.
- 4) Apprentices are employed at work covered within the work processes.
- 5) Apprentices are attending classroom instruction and during the visit were in attendance at a "tailgate" safety session.
- 6) The auditor check an apprentice for the recording and tracking of OJT hours, at it relates to their work processes. It was incomplete and without the journey signature.

## **Recommendation:**

- a) The program does monitor job sites to ensure that apprentices are adequately employed and supervised. The programs needs to ensure that the apprentices are recording their OJT hours in the "Quarterly Work and Training record" card and correctly tracking hours within the individual work processes.
- b) Ensure journeyman's signature and knowledge of this process.

*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.*

10. **SELF-ASSESSMENT REVIEW AND PROGRAM IMPROVEMENT PLAN:**

**Objective:** To determine if the programs have submitted the annual Self-Assessment Review and Program Improvement Plan due December 31, 2006.

**Findings:**

- a) The required annual Self-Assessment Review and Program Improvement Plan has been submitted for 2006006.

**Recommendation:** None

11. **COMMITTEE MEETINGS AND MINUTES OF MEETINGS:**

**Objective:** To determine if the apprenticeship committee(s) are meeting regularly, documenting actions, discussing and reviewing apprentice records, and making appropriate assessments and evaluations.

**Findings:**

- a) The program has a Committee that meets monthly and has documentation of these meetings (agendas) on file and reviewed by auditors. The program emails the agenda and concluding meeting minutes to its JATC members.

**Recommendation:** None

**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.

**CORRECTIONS AND TIMELINE**

The audit findings and recommendations are outlined in this report. The programs have 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.

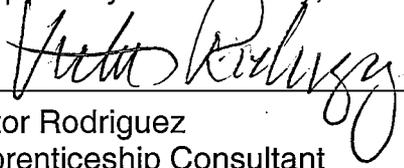
The final report will detail the findings with recommendations for remedial actions. The programs must remedy any and all deficiencies and be in full compliance with their apprenticeship standards. The programs must notify the DAS in writing when deficiencies have been remedied. A DAS representative 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.

**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. Also, law changes or new rulings might result in different findings in future audits.

Respectfully submitted by,

  
\_\_\_\_\_

Victor Rodriguez  
Apprenticeship Consultant  
DAS, San Francisco

5/9/07  
\_\_\_\_\_

Date

# FIELD IRONWORKERS APPRENTICESHIP & TRAINING PROGRAM

California - Nevada - Arizona

3130 Bayshore Road • Benicia, CA 94510 • (707) 746-7666 • Fax (707) 746-0145

DANA O. FAIRCHILD  
COORDINATOR



May 23, 2007

Victor Rodriguez  
Division of Apprenticeship Standards  
455 Golden Gate Ave., 10<sup>th</sup> Floor  
San Francisco, CA 94102

07 MAY 24 PM 1:59

Dear Mr. Rodriguez

This letter is in response to the audit performed by the DAS for the International Association of Bridge, Structural, Ornamental and Reinforcing Ironworkers. We would like to note that this committee has gone under numerous changes in the last two years not only with moving locations twice for improved training facilities but also with training of new office support staff. We have now moved into our new facility and have office staff to support the needs of the committee.

Under the Audit Findings and Recommendations:

#3 Recommendations, Active Apprentices and Cancellations: as noted in your report this was completed on or about April 7, 2007. This function is now completed after each JATC meeting.

#4 Recommendations, On-The-Job Training: We do have a method in place for tracking of OJT hours by the apprentice on their work process cards. Once the hours are recorded the card must then be signed by their foreman. This card is required to be submitted to the coordinators office. The cards are now filed in the apprentices file. We are in the process of determining a method for tracking cumulative work hours. This would also identify any issues with the apprentices OJT hours.

RECEIVED  
DAS RECORDS SECTION  
SAN FRANCISCO  
07 MAY 25 AM 10:30

# FIELD IRONWORKERS APPRENTICESHIP & TRAINING PROGRAM

California - Nevada - Arizona

3130 Bayshore Road • Benicia, CA 94510 • (707) 746-7666 • Fax (707) 746-0145

DANA O. FAIRCHILD  
COORDINATOR



#6 Recommendations, Progress Records, Periodic Advancements & Evaluations:  
We have a form for worksite progress evaluation that the apprentice will be issued with their work process cards and will be required to turn in at the same time. A copy of this form has been submitted to DAS. Any below average or inconsistent reports will be brought to the JATC attention.

We would like to thank the DAS for their support and diligence with this audit. We believe it has been a great help both to my staff and myself in recognizing areas of needed improvements along with a better understanding of the system overall.

For The San Francisco JATC

A handwritten signature in black ink that reads "Dana O. Fairchild". The signature is written in a cursive style with a large, prominent "D" and "F".

Dana O. Fairchild  
Coordinator

RECEIVED  
DAS RECORDS SECTION  
SAN FRANCISCO  
07 MAY 25 AM 10:38

**International Association of Bridge, Structural,  
Ornamental and Reinforcing Ironworker  
Local 377 San Francisco JATC**

Area	Findings	Recommendation	Program Response	Task completed
<p><b><u>3. ACTIVE APPRENTICES AND CANCELLATIONS</u></b></p> <p><b>Objective:</b> To determine if the program is monitoring apprentices as they enter and flow through the programs, and to determine if the program is maintaining accurate records of both active and cancelled apprentices.</p>	<p>a) It was determined prior to the audit that the program's active apprentice list was not up to date with DAS records. The program was contacted and began working with its DAS consultant to reconcile the records. On January 30, 2007, the program was sent an updated list of active apprentices and asked to provide a letter of attestation for updating (active, cancel and completion) the program. On March 7, 2007, the DAS received the updated list with a letter that was signed by the coordinator, Dana Fairchild, attesting, under penalty of perjury, that the information provided was true and correct, to the best of his knowledge. The DAS San Francisco Field Office requested further declaration stating the re-issuance of trade certificates being that if the trade certificate were recovered, it would be returned back to DAS. This further attestation was received, under Dana Fairchild's signature on April 5, 2007. DAS proceeded to update the program's apprentice list. This function was completed on or about April 7, 2007</p>	<p>The program(s) should keep the DAS informed of cancellations and completions every 30 days.</p>	<p>Update of records was done on 4/4/07. This function is now completed after each JAT meeting.</p>	<p>Yes</p>
<p><b><u>4. ON-THE-JOB TRAINING (OJT):</u></b></p> <p><b>Objective:</b> To determine if apprentices are progressing on schedule, that the program is maintaining adequate OJT records, and to determine if the program has adequate systems in</p>	<p>a) There were records of OJT hours in the reviewed apprentice files. The program has a status report which details the classes and hours that the apprentice has completed, the total number of OJT hours that the apprentice has completed and the period of apprenticeship</p> <p>b) There is a mechanism or system to keep</p>	<p>a) Develop a system that allows the recording of the OJT hours spent in each Individual work process into the status report and make this information available for the JATC to take corrective action, if needed.</p>	<p>The program has a system in place for tracking OJT hours by the apprentice on their work process cards.</p> <p>Once the card is completed and recorded, it must be signed by a foreman and, then, submitted</p>	<p>To be reviewed by DAS consultant in 90 days</p> <p>To be reviewed by DAS consultant in 90</p>

<p>place to ensure that apprentices are covering all the work processes.</p>	<p>track of the OJT hours worked by the work processes covered. The program provides an "Apprentice Quarterly Work and Training Record" card to the apprentice and is collected quarterly by the coordinator. The card is to have the apprentice's signature with a verification signatory from the job's Forman. The cards are being collected by the coordinator but were not included in the file of the apprentice. Thus, the auditors were unable to determine if all apprentices were in compliance.</p>	<p>b) Convey the importance of timely and accurate reporting.</p> <p>c) Keep a record of the OJT hours per work process in each apprentice file.</p> <p>d) Develop a mechanism to track and/or identify apprentices who have not Submitted timely OJT hours. The program should follow and enforce their Rules and Regulations and cite apprentices as required when violations occur.</p> <p>e) Immediately evaluate the apprentices to ensure that they are receiving proper training and supervision in all required work processes</p>	<p>into the coordinator.</p> <p>Cards will be placed into apprentice's file.</p> <p>In process of developing method for tracking cumulative work hours that can be used to identify any issues with the apprentice's OJT hours.</p> <p>Developed a worksite progress evaluation form that will be part of the work process cards. Both will be required to be submitted at Time of completion</p>	<p>days</p> <p>To be reviewed by DAS consultant in 90 days</p> <p>To be implemented and reviewed by DAS consultant in 90 days</p> <p>To be implemented and reviewed by DAS consultant in 90 days</p>
<p><b><u>5. RELATED AND SUPPLEMENTAL INSTRUCTION (RSI):</u></b></p> <p><b>Objective:</b> To determine if apprentices are progressing on schedule, attending classes, covering the entire course of study, and to ensure the program is maintaining accurate records with adequate systems in place to provide the training</p>	<p>a) The program(s) does have related and Supplemental Instruction (RSI) provided under collaboration with the San Leandro Unified School District is the Local Education Agency (LEA). According to the Coordinator, the program offers "an introductory eight (8) week Saturday course as an introduction to the trade. The apprentice is then scheduled to complete 13 core classes over the course of their apprenticeship. The classes are offered under a semester system and, after completion of the Saturday classes, the classes are structured in a Monday-Friday format. The apprentices are not compensated for the RSI, but can apply for unemployment benefits.</p>	<p>Continue to invite the LEA representative and encourage their participation.</p>	<p>No response from program</p>	<p>DAS consultant to review attendance records in 90 days</p>

	<p>b) The program's records are very accurate and detailed. Status reports for each apprentice is kept by the coordinator and placed in the file. Instructors are required to take attendance and each apprentice is required to sign-in, at least, twice a day.</p> <p>c) During the review of the programs past agenda minutes (one year), there was no record of attendance by the LEA representative.</p> <p>d) The auditors had the opportunity to "sit-in" during the Reinforcing 1 class. The auditors were very impressed with the interaction of the apprentices with the instructor and the manner in which the instructor kept all apprentices active and engaged</p>			
<p><b><u>6. PROGRESS RECORDS, PERIODIC ADVANCEMENTS AND EVALUATIONS:</u></b></p> <p><b>Objective:</b> To determine if apprentices advance on schedule, receive periodic evaluations and to ensure the programs have adequate records and systems in place to monitor progress and keep apprentices on schedule.</p>	<p>a) Progression is determined, jointly, by the JATC with a recommendation by the determines The JATC, with a recommendation from the coordinator, grants how much credit is given when an apprentice enters the program The employment history, past participation, recommendation from sponsoring employer, are a few of the factors reviewed when determine credit. The JATC, with a recommendation from the coordinator, decides when the apprentice advances, after meeting pre-determined OJT hours and RSI classroom hour's completion. . The JATC, with a recommendation from the coordinator, submits to DAS a request for a trade certificate when the apprentice(s) have completed all requirements of the program.</p> <p>b) In the 107 records reviewed, there was evidence of documentation for upgrades in</p>	<p>a) Establish a process to identify apprentices who are not progressing on schedule so that they can be counseled early and consistently throughout their training.</p> <p>b) Establish a form and process to document apprentice's evaluation at the worksite. This document should include, but not limited to, quality of work, quantity of work, job knowledge, getting along with other. This document should be signed by the apprentice and job site representative and reviewed by the coordinator. Any</p>	<p>Developed a worksite progress evaluation form that will be part of the work process cards. Both will be required to be submitted at Time of completion.</p>	<p>To be implemented and reviewed by DAS consultant in 90 days</p>

	<p>the files, including support documentation for completion certificates. However, the evidence was not complete. For example, there was missing documentation that failed to show the full progression of upgrades. Some records had evidence of progression for periods 1,2,3,5 &amp;7, but were missing for periods 4 &amp;6. In addition, the completion letter was not present in all records. At least, 75% of the records showed evidence of this lack of documentation.</p> <p>c) There was evidence of apprentices not receiving pay advancements or completion of program at the time when such accomplishments were attained. The program grants advancements twice a year, March and September, irrespective of advancements occurring between these periods.</p> <p>d) The program does not have an adequate means of evaluating apprentice at the work site. The JATC and the coordinator rely upon anecdotal evidence supplied by business agents or employers. The type of practice is typical know as “word of mouth” and is a means that the coordinator states has been successful. However, the type of evaluation does not supersede a written statement on how well or not well; an apprentice is grasping the trade.</p> <p>e) The coordinator is instrumental in monitoring or reviewing apprentice records, on-the-job training activities, related and supplemental instruction, or advancements.</p>	<p>below average scores or ratings should be brought to the JATC attention for reviewed and, if necessary, appearance by the apprentice to the JATC.</p> <p>c) Establish remedies to insure timely advancements, at time of accomplishment.</p> <p>d) While not mandatory, it would be desirable to supply each apprentice with a quarterly status on actual vs. planned completion of both RSI and OJT hours.</p>	<p>Not address by program</p> <p>Not address by program</p>	<p>To be implemented and reviewed by DAS consultant in 90 days</p> <p>To be reviewed by DAS consultant in 90 days</p>
<p><b><u>7. MECHANISM TO KEEP APPRENTICES REASONABLY EMPLOYED:</u></b></p>	<p>a) The apprenticeship program does have a system of keeping apprentices reasonably employed through a job referral system. In the event of a layoff, the apprentice has</p>	<p>a) Establish a process to review work process and, if necessary, move the apprentice to another</p>	<p>In process of developing method for tracking cumulative work hours that can be used to identify any issues with the</p>	<p>To be implemented and reviewed by DAS consultant in 90</p>

<p><b>Objective:</b> To determine if apprentices are kept reasonably employed, and to ensure the program has adequate systems in place to rotate apprentices so they may cover all the work processes, and to provide apprentices with continuing employment in the event of layoff</p>	<p>been informed that he/she is to immediately go the union hall and inform the union hall of the layoff. The apprentice, is then, placed on a "out of work" list and called for employment, when there name is called.</p> <p>b) As noted previously (item #4 On The Job training) the program does have a means to track the OJT hours as it relates to the completion of the work processes, however, without this timely c documentation, an apprentice may find him or her self completing all the work processes, but having a concentrated trade specific skill. Such as, only being able to do rebar work. There is only one active employer and the availability of work hinges on the work flow of the employer.</p>	<p>employer or have the employer change the job assignment, to insure full exposure and training in all the work processes</p>	<p>apprentice's OJT hours</p>	<p>days</p>
<p><b>9. JOB SITE VISIT:</b></p> <p><b>Objective:</b> The job site visit offers an opportunity to view a job in progress, observe the work that is being done, and provides the opportunity to discuss the operation of the program with the apprentice. It enables direct contact with the apprentice to determine:</p> <ol style="list-style-type: none"> <li>1) If the apprentice is performing the various tasks listed within the work processes of their trade</li> <li>2) If advancements are made on schedule</li> <li>3) if the apprentice is receiving the correct pay and benefits</li> <li>4) If the apprentice is kept employed on a reasonably continuous basis</li> <li>5) If the programs' mechanism to</li> </ol>	<p>a) Auditors visited the San Francisco Municipal Light rail Maintenance yard project located at the South of Market Street District in San Francisco on April 6, 2007. Three apprentices (Kathy DeMartini, Harold Kuer and Jose Montoya) were observed doing various tasks. Ms. DeMartini was observed spotting a forklift operator as he back-up the forklift. She also, sorted and moved materials. Mr. Montoya was observed working with Ms. Martini in arranging and sorting material and preparing himself to connect together some iron bars, some 20 feet in the air. Mr. Kuer was observed assisting an operating engineer in getting his boom stabilized and secured. He then, assisted in getting a piece of iron ready to be lifted onto the structure. All apprentices were under the guidance of, at least, six journeymen for each apprentice.</p> <p>b) The apprentices were interviewed with the following results:</p>	<p>a) The program does monitor job sites to ensure that apprentices are adequately employed and supervised. The programs needs to ensure that the apprentices are recording their OJT hours in the "Quarterly Work and Training record" card and correctly tracking hours within the individual work processes.</p> <p>b) Ensure journeyman's signature and knowledge of this process.</p>	<p>Developed a worksite progress evaluation form that will be part of the work process cards. Both will be required to be submitted at Time of completion.</p> <p>Not address by program</p>	<p>To be implemented and reviewed by DAS consultant in 90 days</p> <p>To be implemented and reviewed by DAS consultant in 90 days</p>

<p>keep apprentices reasonably employed is adequate.</p>	<ol style="list-style-type: none"><li>1. The apprentices are receiving the proper pay and benefits.</li><li>2. Adequate tools and materials were available at the work site to train the apprentices.</li><li>3. There was a proper ratio of Journeymen to Apprentices and adequate supervision.</li><li>4. Apprentices are employed at work covered within the work processes.</li><li>5. Apprentices are attending classroom instruction and during the visit were in attendance at a "tailgate" safety session.</li></ol> <p>The auditor check an apprentice for the recording and tracking of OJT hours, at it relates to their work processes. It was incomplete and without the journey signature.</p>			
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