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STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL RELATIONS
DIVISION OF APPRENTICESHIP STANDARDS

AUDIT REPORT

For

City of Pasadena Cable Splicers

JAC, File 10531

&

City of Pasadena Linemen JAC,

File 10532

The Division of Apprenticeship Standards (DAS) creates opportunities for Californians to gain employable lifetime skills and provides employers with a highly skilled and experienced workforce while strengthening California's economy.

CONTENTS

Summary.....	3
Findings and Recommendations.....	3
Audit Highlights.....	4
Introduction/Background.....	4
Scope/Focus/Methodology.....	5
Audit Results and Recommendations.....	6
Comments from Program Sponsor.....	14
Correction and Timeline.....	14
Remarks.....	14

SUMMARY

The Division of Apprenticeship Standards (DAS) presents its audit report concerning the City of Pasadena Cable Splicers Joint Apprenticeship Committee (JAC) program; DAS file number 10531, and City of Pasadena Electrical Lineman Joint Apprenticeship Committee (JAC) program; DAS file number 10532, (hereafter "Program"). The program's standards were approved on July 1, 1968. The program's standards were last revised on June 23, 1989 for the Cable Splicers and on April 18, 1992 for the Electrical Lineman. The City of Pasadena Cable Splicers and Electrical Lineman JAC was selected randomly by the DAS for an audit. The audit was performed on August 12, 2008 and was conducted pursuant to California Labor Code §3073.1.

During the initial preliminary audit preparation it was discovered that the number of registered apprentices reported to the DAS for Cable Splicers is 4 and Electrical Lineman is 8. The program satisfactorily accounted for all registered apprentices'. The program currently reports all withdraws and/or terminations requests to the DAS.

FINDINGS AND RECOMMENDATIONS

As noted in the detailed report which follows, the auditor found that some specific actions are necessary to bring the program into compliance with their approved standards and legal requirements. The apprentices are not submitting a record of their individual work processes as instructed by the Labor Code & California Code of Regulations. The Committee meets informally on a daily bases. The DAS requested committee meetings notes for the past 12 months, however documented minutes of committee meetings have not been kept as required by the program standards. The program standards have not been revised since June 23, 1989 for Cable Splicers and April 18, 1982 for Electrical Lineman. Program standards for both programs were submitted to the DAS on the day of the audit for approval.

The program is doing a good job at keeping apprentices on schedule. The training facility and its instructor keep accurate records on class attendance and completion of Related Supplemental Instruction (RSI). Accurate records are in place to track apprentice upgrades and rate increases and apprentices are keeping continuously employed.

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

AUDIT HIGHLIGHTS.....

Our review of the City of Pasadena Cable Splicers Joint Apprenticeship Committee (JAC) program; DAS file number 10531, and City of Pasadena Electrical Lineman Joint Apprenticeship Committee (JAC) program; DAS file number 10532, (hereafter "Program") found that:

- The Cable Splicers JAC program, file number 10531 has not submitted revision of standards since June 23, 1989 and Electrical Lineman JAC program, file number 10532 has not submitted a revision of standards since April 18, 1992.
- The program requires all apprentices to sign and confirm that they understand the programs Rules and Regulations. The apprentice files all contained signed copies of this document.
- The program made requests to DAS to cancel or complete apprentices for the last four years. The number of registered apprentices for this program is consistent with DAS records.
- Apprentice's individual personnel files contained consistent verifiable OJT work hours however apprentices' are not required to complete an Apprentice Record Book (blue book) to track individual work processes and OJT work hours. Each apprentice is given a hardbound "red" ledger to document work processes, work location, date and total number of hours worked however, there is no documentation to verify a breakdown of apprentices' individual work processes. Work processes are not consistent with program apprenticeship standards. All record of disciplinary actions due to poor work performance or excess absences are documented and found in individual apprentice personnel files. The job site review found that the apprentices are not being required to track individual work processes.
- The programs have completed and submitted the annually required Self-Assessment Review and Program Improvement Plan to DAS. The program submitted the Self-Assessment Review in December 2007.
- The program does not have regularly scheduled committee meetings and have no recorded minutes of meetings however they do hold informal meetings. All disciplinary actions are recorded by the City of Pasadena Personnel Department.

On August 12, 2008, the auditor 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 City of Pasadena Cable Splicers and Electrical Lineman Joint Apprenticeship Committee (JAC) program operates as a Labor/Management Cooperative and the principal partners in the cooperative effort are the members of the International Brotherhood of Electrical Workers (IBEW), Local 18.

The Daily operations, management and administrative functions are run by one part time Apprenticeship Coordinator, who uses 10% of their time for apprenticeship, and 1 full time Training Instructor and 3 part time instructors. The program office is located at: 311 W. Mountain Street, Pasadena, CA 91101.

Employers are approved to train when they have completed an Agreement to Train Apprentices, DAS-7 form. The program indicated that they comply with the rules, regulations and decisions of the City of Pasadena.

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

Name of Occupation: Cable Splicer
Term of Apprenticeship: 8,000 hours / 4 years

Number of Apprentices: 8

Name of Occupation: Electrical Lineman
Term of Apprenticeship: 6,000 hours / 3 years

Number of Apprentices: 4

The Related and Supplemental Instruction is provided by the programs training center which is at the same site as the program operations. Each apprentice enrolled receives a comprehensive orientation packet that includes the rules and regulations, an explanation of the program standards, a hardbound red ledger for each apprentice to document daily work process and a class schedule. Los Angeles Trade Technical College is the apprenticeship program's Local Education Agency (LEA) Local Education Agency (LEA) for Cable Splicer.

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 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) Our review found that the program has not submitted current revision of standards. The program coordinators submitted revised program standards to the DAS on August 12, 2008 for approval.

(b) Recommendations

(1) Revise and update program standards regularly and submit to the DAS.

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. When the apprentice is approved by the program to enter the training (passes an oral interview) he/she is given a copy of the rules and regulations and attends an orientation session with both the coordinator and educational instructor. Then 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 to show that the apprentice has read and reviewed this document.

(2) The rules and regulations for this program were adopted and contain a policy statement showing responsibilities of the apprenticeship 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. The apprentice files contained copies of evaluations and progress. All disciplinary actions are processed by the City of Pasadena Personnel Department.

(3) The apprentice files contained copies of citation letters.

(4) The committee meets informally daily however program committee meetings minutes have not been kept since 1989. The program has indicated that they are taking steps to insure all future meeting minutes are documented and made available to the DAS.

(b) Recommendations

(1) The program should work with the DAS consultant for assistance on scheduling regular meetings and record meeting minutes as required. Due in 30 days.

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) Findings

(1) The program is properly monitoring each apprentice progression. The program works closely with the City of Pasadena Personnel Department to track all apprentices' work and training hours and disciplinary actions.

(2) The program has requested completion requests for the last four years and the numbers of registered apprentices for this program were correct.

(b) Recommendations

(1)The program will continue to keep the DAS informed of indentures, cancellations and completions in a timely manner.

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 must abide by the requirements set by the program and the terms of the Collective Bargaining Agreement. Therefore, if the apprentice is not current in all fees and dues to the IBEW Local 18, they will not progress to the next level of training.
- The apprentice is required to skill level evaluation test at the end of each semester before progressing on to the next level of training.
- The employer provides work evaluations every six months and may contain work hours completed. The program will notify the apprentice when advancements are earned.
- The program keeps advancement records for each apprentice in their individual apprentice file. Each apprentice file keeps track of how many work and class hours the apprentice has completed. This information is used to advance the apprentice to the next level and receive a wage increase. The committee reviews each level change.
- To keep the apprentice on schedule the program will send out written notices on class schedules and evaluations. Apprentices failing to meet requirements are cited and notices are mailed with a request to explain why they should not be disciplined or terminated.

(a) Findings

(1) The program did not require apprentices to document individual work processes and did not document each individual apprentices' work process. The program coordinator indicated the program will create a form for apprentices to document individual processes. The program has created an excel spreadsheet to document a breakdown of apprentices' individual work processes and will be implementing it within 30 days.

(2) The program follows City of Pasadena policy and procedures on progressive disciplinary actions. Evidence of disciplinary actions due to poor performance or excess absences were found in individual apprentices' personnel files.

(b) Recommendations

(1) Implement record keeping changes to record proper breakdown of work processes of OJT hours – **Due in 30 days**

(2) Provide apprentices' training on how to properly document breakdown of work processes of OJT hours- **Due in 30 days**

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 a Local Education Agency (LEA) which is Los Angeles Trade Technical in Los Angeles, California and the IBEW Local 18 located in Pasadena, CA. The program is assigned the oversight of the Related Training Curriculum. The classroom training center is located at 400 W. Washington Blvd., Los Angeles, CA 90015.

The apprentice files included records of attendance, classroom hours, and evaluations/grade reports from the instructor. The apprentices will attend 144 hours of instruction and are scheduled each semester. Each student is issued a calendar with the schedule of classes. Classes run every other Friday, 8 hours each day. An apprentice has 30 days to make up any classes missed.

The instructor signs each apprentice in and out on a sign in sheet. The program has several tracking systems in place that monitor the progress of the apprentices.

The apprentice personnel files contain a consistent record of all absences related to school attendance. The apprentice files also contained grade and completion reports from the instructor with a recommendation that the apprentice is ready for the next level in training.

(a) Findings

(1) Program files indicate the program is complying with DAS in monitoring the apprentice progression through the required instruction and is providing the appropriate courses for this occupation.

(b) Recommendation

(1) Explore and continue to provide updates to the program and the apprentice(s) on how the apprentice(s) is progressing in their required educational courses.

(2) Review curriculum and develop new courses to cover additional needs when needed.

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.

There are three instructors in this program. All instructors are dedicated on a part-time basis to provide instruction. During our visit classes were not in session due to the end of school year period. The auditor spoke with an instructor and toured the facility. The training center consists of one large classroom and shop labs utilized for demonstrations and on-hand working booths to make special projects. Each apprentice must complete a variety of shop projects 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.

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 places to rotate apprentices so they cover all work processes, and to provide apprentices with continuing employment in the event of a layoff.

Program files indicate the program has an established system to keep apprentices reasonably employed and to provide them with continuing employment in the event of a layoff. Apprentices are employed by the City of Pasadena. All Job Placement will be through the City of Pasadena Personnel division office and the IBEW local 18. It is the apprentice responsibility to keep the office advised of any phone or address changes that may occur. It is also the responsibility of the apprentice to be current in all fees or dues to the IBEW Local 18 to be eligible for dispatch.

(a) Findings

(1) The program is administered by the City of Pasadena and the apprentices are employees for the public sector. The city of Pasadena has policies and procedures in place to provide apprentices with reasonable and continuing employment.

(b) Recommendation

(1)The program should continue the system they have in place.

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.

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 auditor visited two job locations and found two apprentices working under the supervision and direction of journeyman and was employed at task defined within the work processes of the program standards.

Interviews were conducted with the two apprentices and found they have the equipment, materials and tools of the trade sufficient to train apprentices. Each apprentice receives proper pay and benefits and attends OJT classroom training. The interviews confirmed apprentices are advanced on schedule. We confirmed that the City of Pasadena document apprentices' total hours of training in the apprentices' individual Personnel file, however, the apprentices do not have a clear understanding of how to document individual work processes because they have not been required to do so. The interview with the supervisor confirmed that a breakdown of work processes had not been required. The supervisor also confirmed there is a proper ratio of journeyman to apprentice and adequate supervision.

(a) Findings

(1) The program files and interviews with program coordinators, supervisors and apprentices indicate that apprentices have not been required to complete individual work processes. The program coordinator indicated the program has created a tracking system to record a breakdown of apprentice individual work processes and will implement the system within 30 days.

(b) Recommendations

(1) Implement a uniform system to keep and track apprentices' individual OJT hours - **Due within 30 days.**

(2) Instruct all apprentices and supervisors on how to properly complete individual work processes - **Due within 30 days.**

- (3) The program should continue to monitor job sites ensuring apprentices are adequately employed at the work processes, recording OJT hours, working under the direction of a journeyman and 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.

8. 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 to the DAS for 2007 as required.

(b) Recommendations

- (1) Continue to submit the Self-assessment Review and Program Improvement Plan as required by the DAS.
- (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.

9. 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 was unable to provide program meeting minutes for the past year. Although meetings are held regularly, the program has not kept documentation of these meetings as required. The program coordinator indicated the program will immediately implement the scheduling of regular committee meetings and the documentation of all committee meetings.

The programs rules and regulations state that this committee is a Labor/Management Co-Operative. Also noted in the rules and regulations are the three (3) Labor Trustees and three (3) Management Trustees. The committee also includes the apprenticeship coordinator and Local Education Agency Representative (LEA).

The program stated all disciplinary actions must be reviewed by the committee however there has not been any disciplinary action required within the last year.

(a) Findings

(1) The committee has been meeting informally but has not been documenting committee meetings and actions related to training, disciplinary action reviews, assessments and evaluations of apprenticeship records.

(b) Recommendations

(1) The committee must implement the scheduling of regular committee meetings and the documentation of all actions related to training, disciplinary action reviews, assessments and evaluations of apprenticeship records. Within 30 days.

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,



Alma Venable
Apprenticeship Consultant Auditor
DAS, Los Angeles District Office



Date

From: Rowbotham, John
To: Alma Venable
Subject: RE: City of Pasadena Cable Splicers JAC, City of Pasadena Linemen JAC File # 10531/10532 -
Apprenticeship Program Preliminary Audit Report
Date: Tuesday, September 23, 2008 11:31:09 AM

Morning Alma

Thanks again for your help in our audit and I have reviewed your findings and agree.

The two topics that really needed immediate attention have been handled.

1. Regular meetings are being scheduled quarterly with our Rep Anne Calvo. Second our committee now has my staff assistant taking notes every time we meet. Local meetings are held after every step test for review and when any crew rotations are done.
2. Time keeping forms for the apprentices is managed by the Chair of the committee and we have developed an access data base that my staff assistant populates monthly with the apprentices times. Chair will also instruct apprentices in how to properly complete the daily time keeping forms.

As to the standards we have received an edited copy of our update from Anne and will review and turn in for the DAS to approve.

Thanks again

John

John Rowbotham

City of Pasadena Power Distribution Supervisor Underground Power 100 North Garfield Avenue - PO Box 7115 Pasadena, CA 91109
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From: Alma Venable [<mailto:AVenable@dir.ca.gov>]
Sent: Thursday, September 18, 2008 2:19 PM
To: Rowbotham, John
Subject: FW: City of Pasadena Cable Splicers JAC, City of Pasadena Linemen JAC File # 10531/10532 -Apprenticeship Program Preliminary Audit Report

John,

Please let me know if this one came through.

Thank you.

Joe Armstrong and John Rowbotham:

The audit of the City of Pasadena Cable Splicers JAC, file#10531 and City of Pasadena Linemen JAC file# 10532, conducted in accordance with the provisions of the State of California Labor Code Section 3073.1, is complete. The audit resulted in the findings and/or deficiencies noted in the preliminary audit report.

The audit, findings and recommendations, and careful examination of your apprenticeship program, are outlined in the report attached with this email. A copy of this report has also been sent to you via regular mail. The program now has 14 days from the receipt of this letter in which to review and submit comments on the report. Within 10 days of the close of your comment period a final report will be submitted to the California Apprenticeship Council. The final report will detail the findings with recommendations for the remedial action.

At the time of the audit you were informed of the audit procedures and informally presented with a brief overview of audit findings and/or deficiencies. If you have any questions regarding the report, please contact me for assistance. If there are any formal comments you wish to make, please submit them in writing to me at the above address, so that I may forward them to the Chief/DAS along with the report for his review and recommendations.

RECEIVED
DAS DISTRICT OFFICE
FRESNO
18 OCT -6 PM 1:59

The results of this audit do not rescind or replace other duties and requirements or any previous notices you may have regarding the fulfilling of your obligations prior to or after the audit period. Also, law changes or new rulings may result in different findings for future audits. Please feel free to call on us any time we can be of service.

You may contact me at the Los Angeles office at (213)576-7750, or my cell phone at (213) 598-5716 or by Email at www.avenable@dir.ca.gov

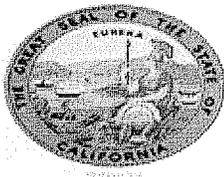
Thank you, to both you and your staff for your assistance and cooperation during the audit. <<10531-10532 City of Pasadena Cable Splicers Electrical Lineman Audit Rept.docx>>

Sincerely,

Alma Venable

Apprenticeship Consultant

Audit Unit



Dept of Industrial Relations

Div. of Apprenticeship Standards

Los Angeles

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"Resolve to succeed. The greatest discovery one can make is that nothing is impossible"

The file attachment 10531-10532 City of Pasadena Cable Splicers Electrical Lineman Audit Rept.docx was removed due to security restrictions.

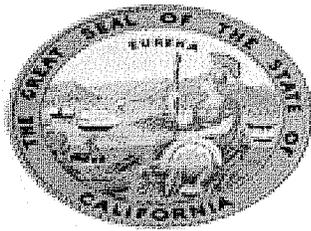
From: Alma Venable
To: Armstrong, Joe; Rowbotham, John;
cc: Alma Venable;
Subject: RE: City of Pasadena JAC File 10531/10532- 14 Day Audit Response Due
Date: Friday, October 03, 2008 2:21:26 PM
Attachments: File 10531,10532 City of Pasadena Cable Splicers-Linemen Audit Report.docx

Joe and John,

Attached is a revised copy of the report with the correct number of apprentices. If you have any questions, please let me know either by email or please feel free to contact me at my cell phone at (213) 598-5716.
Thank you.

Alma Venable

*Apprenticeship Consultant
Audit Unit*



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"Resolve to succeed. The greatest discovery one can make is that nothing is impossible"

succeed. The greatest discovery one can make is that nothing is impossible"