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STATE OF CALIFORNIA  
DEPARTMENT OF INDUSTRIAL  
RELATIONS  
DIVISION OF APPRENTICESHIP  
STANDARDS

**AUDIT REPORT**

**For**

**46 Northern California Counties**

**Drywall/Lathing, JATC,**

**File 16297**

*The Division of Apprenticeship Standards (DAS) creates opportunities for Californians to gain employable lifetime skills and provide 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 46 Northern California Counties Drywall/Lathing Joint Apprenticeship Training Committee (JATC) program; the DAS file number 16297, (hereafter "Program"). The 46 Northern California Counties Drywall/Lathing JATC was selected randomly. The audit was performed during November 4, 2008 to November 18, 2008 and was conducted pursuant to California Labor Code §3073.1

The following charts show the Program's success:

### NUMBER OF REGISTERED APPRENTICES

DAS Records Based Upon Program's Submittals	1,057	According to Program	1,053
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### PROGRAM COMPLETIONS

	2003	2004	2005	2006	2007	2008
DAS Records	119	138	141	111	122	124
Program Records	112	127	135	111	120	Unknown

## FINDINGS AND RECOMMENDATIONS

In the detailed report which follows, the DAS Auditor, found that the Program is committed to providing a successful apprenticeship program. The Program shared all information relating to the Audit. Further review indicates that the Program is in compliance with their approved standards and legal requirements.

The Program has an excellent system in place, and is keeping apprentices on schedule. The training facilities and its instructors keep accurate records on class attendance and completion of Related Supplemental Instruction (RSI). Accurate records are in place to notify employers of apprentice upgrades and rate increases and apprentices are keeping continuously employed.

The 46 Northern California Counties Drywall/Lathing Apprenticeship JAC's are committed to helping apprentices reach their goal of becoming a journeyman in the Drywall and Lather trades.

## INTRODUCTION/BACKGROUND

The Audit began on November 4, 2008, the Auditor met with the Director and three administrative personnel. The apprentice's records were examined, administrative activities were observed, a walk-through was conducted in each of the four training facilities and twenty-eight job site visits were conducted by three Auditors. The DAS Audit Unit used three Auditors to visit the training centers and view on-the-job site visits. The 46 Northern California Counties Drywall/Lathing Joint Apprenticeship Training Committees (JATC) operate as Labor/Management Cooperative and the principal partners in the cooperative effort are the members of the Northern California Drywall Contractors Association and Northern California Carpenter Regional Council. The program has an Apprentice Trust Fund. The programs funding mechanism comes from employer Contributions, Related Supplemental Instructional (RSI) Funds and state prevailing wage training fund contributions.

The daily operations, management and administrative functions are run by the Director, four Coordinators and three clerical staff. There are a total of seven instructors working at the four training centers. The training centers are located in Hayward, Morgan Hill, Fresno and Sacramento, California. There are seven committees covering all 46 counties in Northern California. The headquarters/main office is located at 23217 Kidder Street, Hayward, CA 94545.

Employers are approved to train when they have completed an Agreement to Train Apprentices, DAS-7 form. The program indicated that they dispatch from the local unions signatory employers who agree to abide by the program's standards, rules, regulations and policies.

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

<u>Name of Occupation</u>	<u>Term of Apprenticeship</u>	<u>Number of Apprentices</u>
<b>Drywall/Lather</b>	<b>48 months</b>	<b>1053</b>

The Related and Supplemental Instruction is provided by the program's four training centers which are listed above. Each apprentice enrolled receives a comprehensive orientation packet that includes the rules and regulations, an explanation of the program standards, the Apprentice Work Record book and a class schedule. The Los Rios Community College District, which includes American River College, is the apprenticeship program's Local Education Agency (LEA).

## **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 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:**

The Revised Standards for this Program were approved by the DAS Acting Chief, Glen Forman, on April 7, 2008.

#### **(b) Recommendations:**

There are no recommendations needed.

*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.

#### **(a) Findings:**

The Program's General Policy-Rules and Regulations are written in both English and Spanish and are given to each apprentice on the day of orientation. In every apprentice's personal file is an acknowledgement signed and dated by the apprentice showing they received a copy. These Rules and

Regulations address the following issues: on-the-job training, RSI, change of address notification, out-of-work list, employers hiring apprentices, disciplinary action and the appeal of such, sexual harassment and requiring the apprentice sign and date they read the policy, a detailed written instruction on how to fill out the work processes and much more.

**(b) Recommendations:**

There are no recommendations needed.

*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:**

A random review of apprentice files found the following items in each file: US Department of Labor Apprentice Agreement, the DAS 1 form (Apprentice Agreement), Drywall/Lather Apprentice Application form, UnionNet an internet program to track the progress of the apprentice, signed and dated Rules & Regulations, Job Site Safety Orientation, a signed and dated Harassment Free Workplace Policy, class notice, work referral, a complete history of everything the apprentice has done in the program. Other documents found in some files were: change of address, cite notice, show cause notice, cancellation notice, notification of apprentice transfer, and voluntary cancellation notice to name a few.

The Program submits all the appropriate DAS forms to each district office when the status of an apprentice changes. The apprentices are evaluated four times per year when they attend school. The work process books are submitted at the time of class and review for accuracy.

**b) Recommendations:**

There are no recommendations needed.

*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.

**(a) Findings:**

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 JATC they will not progress to the next level of training.
- The Apprenticeship Record Work Processes book (brown book) verifies work processes and track work hours. The book must be signed by the employer before turning in the book to the program during the classroom training, four times per year. This book is printed in English and Spanish and includes a list of all the training centers, plus Coordinators with contact information. The book also includes responsibilities of the apprentice such as how to maintain an accurate record of work processes and the general rules. It includes a detailed explanation of each work process; handling & storing of materials; metal studs and layout; interior coverings; exterior coverings; special systems; welding; trim, beads and accessories.
- The program will notify the employer and apprentice when advancements are earned insuring timely upgrades and employer being aware of proper rates of pay and benefits.
- To keep the apprentice on schedule the program will send out written notices on class schedules. The apprentices

failing to meet requirements are cited and notices are mailed with a request to explain why they should not be disciplined or terminated.

The apprentices are evaluated every 6 months when they progress to the next period.

**(b) Recommendations:**

There are no recommendations needed.

*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.

**(a) Findings:**

The program has Related and Supplemental Instruction (RSI) and a Local Education Agency (LEA), which is Los Rios Community College District and American River College, both in the Sacramento area.

Apprentices are required to complete sixteen related supplement instruction classes to graduate. Each class is one week or thirty-six hours of instruction four times per year. For the apprentice to stay on schedule they would need to be scheduled for one class every three months. A total of 144 hours per year needs to be completed.

The Auditor reviewed a random selection of apprentice personal files. Inside each file were the following documents: Apprenticeship Agreement with the Department of Labor, the DAS form 1 (Apprentice Agreement), Drywall/Lather Apprentice Application form, Union information, signed & dated copy of the Rules & Regulations, Job Site Safety Orientation video acknowledgement, signed & dated Harassment Free

Workplace Policy, class notice, work referral, and a copy of the computerized UnionNet database. Other documents in some files were; voluntary cancellation notice, notification of apprentice transfer, cancellation notice, show cause notice, cite notice, and change of address to name a few.

The UnionNet database shows all the information about each apprentice from the start to finish of their four years. A full rounded summary of the hours completed in the work processes, course taken, grades, history information of change of addresses, citations, and indenture date with the estimate date of completion.

**(c) Recommendation:**

There are no recommendations 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.

**(a) Findings:**

There are four training centers located in Fresno, Hayward, Morgan Hill and Sacramento. The Hayward facility is the headquarters and has three classrooms, three labs, and three rotating instructors, serving the Greater Bay Area with about 440 apprentices. The Sacramento center has one classroom, one lab, and one instructor with 260 apprentices. Morgan Hill facility is owned by the Carpenters Committee of Northern California, but allows the Drywall/Lathers to use this training center. It has one classroom, one instructor, one lab and about 260 apprentices. The Fresno training center has two classrooms, one instructor, two labs, and about 111 apprentices.

Each apprentice must complete a variety of shop projects and show competency in applying the trade. There are sufficient supplies, tools and equipment for each apprentice

to use while constructing the mockup displays. The instructors remind the apprentices of safety rules and where the equipment is located in the labs every day before the labs start and after the lunch break. The instruction is done with good health and safety practices in mind.

**(b) Recommendation:**

There are no recommendations needed.

**Fresno Training Facility:**

The program has a certified instructor in this program. The instructor is dedicated full-time. During this visit classes were in session and sat in to observe the session. The auditor spoke with the instructor who reviewed his records with us and toured the facility. The training center is located next to the program with a shop lab just outside the classroom. The training center consists of a classroom and various 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:**

Our inspection of the training facility found it to be sufficient to train apprentices.

**(b) Recommendations:**

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.

**(a) Findings:**

Apprentices who become unemployed are required to sign up immediately on the Apprentice Out-of-Work List at their local Union hiring hall. Dispatchers will refer registered apprentices from this list. The Apprentice must keep the union hall advised of any change of address or phone number. The coordinators at each training center keep weekly contact with employers for referring apprentices to them for work.

The Auditor found, from the job site visits, most employers rotate the apprentices in each work process. This gives the apprentices experience on-the-job.

The current economy has taken a toll on this trade and it has been hard keeping the apprentices reasonably employed. Many employers are contracting work with Public Work funds and projects. In the Bay Area most of the apprentices are working.

**(b) Recommendation:**

There are no recommendations needed.

*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. 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 DAS engaged three auditors to conduct the job site visits, since this Program covers forty-six counties in California. One Auditor conducted visits in the Hayward and Morgan Hill areas, one Auditor visited job sites in the Sacramento area and the other Auditor covered the Fresno area. Below are the findings of each Auditor.

**(a) Findings:**

Hayward and Morgan Hill:

The Auditor was given a list of about 20 job sites and decided on at least one site in each of the ten counties. Most of the jobs were Public Work projects such as universities, colleges, and hospitals. The other site visits included family housing, luxury condominiums, office buildings, and malls.

At each job site the ratio between apprentice and journeyman was one on one. Interviews were conducted with one to four different apprentices on each job. All the apprentices had their own hand tools and enough other equipment, plus materials sufficient to train the apprentices. Each apprentice is receiving proper pay and benefits and attends OJT classroom training. The interviews confirmed apprentices are advanced on their own schedule. The Auditor confirmed that each apprentice writes in the total hours of each of the work processes they perform each week in their record book. The book is signed by the job site supervisor validating the work processes and OJT work hours.

Sacramento:

The Auditor was given a list of 10 specific job sites. The job site visits were selected by the Sacramento Auditor of which a total of 4 were reviewed. Most were Public Works projects. At each job site the ratio between apprentice and journeyman was one on one or one to two. Interviews were conducted with one apprentice on each job site. All the apprentices had their own tools and other equipment, plus materials sufficient to train the apprentices. Each apprentice is receiving proper pay and benefits and attends OJT classroom training. The interviews confirmed apprentices are advanced on their own schedule. The Auditor confirmed that each apprentice writes in the total hours of each of the work processes they perform each week in their record book. The book is signed by the job site supervisor validating the work processes and OJT work hours.

Fresno:

The Auditor made contact with the local area Apprenticeship Coordinator and was given a list of 8 job sites and a random selection of four sites were picked. The visit's performed on November 10, 2008, were made up of two Public Works and two Private work Projects.

Interviews were conducted with the 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. I confirmed that each apprentice writes in the total hours of training in the apprentice record book and know how to complete the work processes. The apprentices state they turn in their record books to the classroom instructor and the journeyman ensure they are completing the work process and OJT work hours. The book is signed by the job site supervisor validating the work processes and OJT work hours. The interview with the supervisor confirmed there is a proper ratio of journeyman to apprentice and adequate supervision.

**(b) Recommendations:**

There are no recommendations needed.

*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:**

The required annual Self-Assessment Review and Program Improvement Plan was submitted on time December 1, 2007. At the time of the Audit, the Program was working on the 2008 Self-Assessment Review.

**(b) Recommendations:**

There are no recommendations needed.

*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.

**(a) Findings:**

The Director provided the seven Committee Minutes for each during the year of 2007. The standard rules of procedure are Roberts Rule of Order. The seven committees use the same database system for recording their meetings.

The minutes include the committee members, call to order, approval of minutes, new indentures, re-indentures, re-rates, journeymen, re-evaluations, transfers, voluntary terminations, disciplinary actions, show causes, re-considerations, and request to re-indenture, to name a few items on the agenda.

The committees which have five Management & five Labor trustees, plus a Local Education Agency Representative, the DAS Consultant, and the director of the Apprenticeship program at their meetings are: Sacramento, San Francisco/San Mateo, and Santa Clara/San Benito JAC's. All of these committees meet monthly.

The Alameda/Contra Costa JAC meets every month, but only has three Management and three Labor trustees on the board.

The other three JAC's have three Management and three Labor trustees. Monterey/Santa Cruz JAC meets every four months. The North Coast JAC and the Fresno JAC meet six times per year.

**(c) Recommendations:**

There are no recommendations needed.

*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.

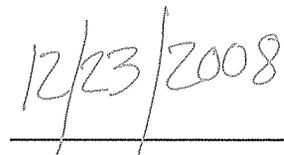
## 13. REMARKS

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,



Linda Knox  
Apprenticeship Consultant-Auditor  
DAS, San Francisco and San Jose Offices



Date

**From:** Rachel Freeman  
**Sent:** Friday, January 09, 2009 10:42 AM  
**To:** Amelia Meza  
**Cc:** Linda Knox  
**Subject:** FW: audit File #16297; 46 Northern California Drywall/Lathing  
**Importance:** High

Hi Amelia,  
Please copy this e-mail as the 14-day response for this audit. Also attached is the report with the comments removed and has Linda's signature. Prepare this one for the CAC (ask Alex if you can print the report on his color printer to capture the signature in color).  
Thank you,

*Rachel Freeman*  
*Audit Unit Manager*  
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**From:** Darell Lawrence [mailto:[dlawrence@drywall-lathing.com](mailto:dlawrence@drywall-lathing.com)]  
**Sent:** Friday, January 09, 2009 10:08 AM  
**To:** Linda Knox; Rachel Freeman  
**Subject:** audit

Dear Rachael- Linda,

First of all I would like to thank you for your time conducting out Audit. Your staff was very professional in their handling of all the aspects of the audit starting with the paperwork in the office and the Jobsite visits that were conducted by your staff.

I was vey glad to hear that you did not have any recommendations for us, as we strive to keep our training of these apprentices to the highest standard.

We have no comments to make on this audit except keep up the good work.

Sincerely,

Darell Lawrence