STATE OF CALIFORNIA
DEPARTMENT OF INDUSTRIAL
RELATIONS
DIVISION OF APPRENTICESHIP
STANDARDS

AUDIT REPORT
For
Western Burglar & Fire Alarm Association
UAC, File 10837

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/Introduction/Background......................4

Scope/Focus/Methodology.............................................5

Audit Results and Recommendations............................6

Comments from Program Sponsor................................19

Correction and Timeline............................................19

Remarks.................................................................19
SUMMARY

The Division of Apprenticeship Standards (DAS) presents its audit report concerning the Western Burglar & Fire Alarm Association Unilateral Apprenticeship Committee (UAC) program; DAS file number 10837, (hereafter "Program"). Western Burglar & Fire Alarm Association Unilateral Apprenticeship Committee. The audit was performed February 9, 2009 and was conducted pursuant to California Labor Code §3073.1.

PROGRAM COMPLETIONS *

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The program has not had program completions since the original program standards were signed in September 2002. (See Section 3 for details on findings of low completion rates)

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.

During the initial preliminary audit preparation it was discovered that the number of registered apprentices reported to the DAS were 85. The program reported they had 65 apprentices'. The program has not currently reported all withdraws and/or terminations requests to the DAS.

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.

* The numbers for these years were not available.
AUDIT HIGHLIGHTS.....

Our review of the Western Burglar & Fire Alarm Association Unilateral Apprenticeship Committee (UAC) program; Division of Apprenticeship Standards (DAS) file number 10837, (hereafter "Program") found that:

- Our review found that the program submitted revision of standards on December 2008.
- The program requires all apprentices to sign and confirm that they understand the program's Rules and Regulations. The apprentice files did contain signed copies of this document.
- The program has not made requests to DAS to cancel or complete apprentices since September 2008. The number of registered apprentices for this program was incorrect.
- The program files contain consistent verifiable OJT work hours. The apprentice is required to complete an Apprentice Daily Record (Blue Book) to track work processes. Work processes are consistent with program apprenticeship standards.
- The job site review found that the apprentices are completing the Daily Record form to track all work processes.
- The program has completed and submitted the annually required Self-Assessment Review and Program Improvement Plan to DAS.

INTRODUCTION/BACKGROUND

On February 9, 2009 the auditor met with key administrative personnel, examined records, observed administrative activities, conducted a walk-through of the training facility and visited jobs sites in connection with the audit. The Western Burglar & Fire Alarm Association Unilateral Apprenticeship Committee (UAC) program operates by itself. The program has an Apprentice Trust Fund. The program's funding mechanism comes from employer contributions, Related Supplemental Instructional (RSI) Funds and state training fund contributions.

The Daily operations, management and administrative functions are run by three primary staff, the Executive Director, the Program Manager and one administrative assistant, who use 100% of their time for apprenticeship. The program office is located 333 Washington Blvd, Suite 422, Marina Del Rey, CA 90292. Chabot-Las Positas Community College District is the apprenticeship program's Local Education Agency (LEA).

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

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

Name of Occupation: Protective Signal Installer (Fire/Life Safety)
Term of Apprenticeship: 6,000 hours/36 months

Number of Apprentices: 65

The Related and Supplemental Instruction is provided by the programs 5 training sites throughout the state located in Glendale, Hayward, Riverside, Sacramento, San Diego and a hybrid correspondence course, one for Northern and one for Southern California. Each apprentice enrolled receives an orientation packet that includes the rules and regulations, attendance procedures, a course syllabus, a class schedule and the Apprentice Daily Record book (blue book).

Each training site maintains the apprentice class records, copies of attendance sheets, final exams, and class schedules.
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

(1) The original program standards were approved September 2002. Our review found that the program submitted a revision of standards in July 2007 to submit a program address change. The program has not submitted a revision to update the current wage scale since March 2004. The program also added a correspondence training component to their curriculum in December 2008 and has not submitted a revision to their standards to reflect this change.

(b) Recommendations

(1) Submit revision of current wages to the DAS. Due within 60 days.

(2) Submit revision of standards to reflect correspondence training to the DAS. Due within 60 days.

(3) Continue to review and update standards as needed or wherever any changes are made to the apprenticeship program and report 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 had received, read, or understood 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 program indicated they have not had to issue any letters of citation to their apprentices.

(3) The rule and regulations have not been updated to reflect current changes in the program.

(b) Recommendations

(1) Review Rules and Regulations Apprenticeship Guidebook annually and update to reflect the current changes in the program. Due within 60 days.

(2) Document disciplinary actions and file in individual apprentices’ files.

Section 3071, 3073, and Section 212 (a) (6) (7), (c) (2) (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 had not requested cancellation requests for apprentices' that are no longer in the program since September 2008. The numbers of registered apprentices for this program is incorrect. The number of reported registered apprentices was 85, when in fact the program actually has 65 registered apprentices. Many of the allegedly active apprentices are no longer active apprentices in the program.

(2) The program has not had program completions since the original program standards were signed in September 2002. (See page 3 above in "Summary" section). The program stated the apprentices drop out of the program once they receive their state certification which allows them to work at a higher rate of pay rather than completing the program. The program was unaware that they had the ability to complete an apprentice without issuing a certificate of completion.

(b) Recommendations

(1) The program shall keep the DAS informed of indentures, cancellations and completions in a timely manner. Report all cancellations to the DAS- Due within 60 days

(2) The program should submit a letter of completion (status 08) to the DAS once an apprentice has been issued a state certification and drops from the program. Due within 60 days.

(3) The program should continue to monitor the apprentice progress in the program at least every 30 days.

(4) All changes affecting the status of the apprentices in the program must be submitted to the DAS.

Section 205 (a)(1)(2) (b), 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.
- The program issues all newly indentured apprentices the DAS "Apprentice Record Book" (blue book) to record their daily work assignments. The apprentice is then required to turn-in this book on a monthly basis. Failure to submit all OJT hours will cause a delay in advancement to the next pay period and higher pay scale.
- Instructors complete a school evaluation form to assure required supplemental instruction is complete. All Instructors fax a class attendance list to the program each evening after class is completed.
- To advance from one period to the next the apprentice is required to have satisfactorily completed 1,000 on the job work hours extending over a period of not more than 6 months, and have satisfactorily completed related and supplemental instruction school hours with a minimum grade of 75%.
- The program will notify the employer and apprentice when advancements are earned insuring timely upgrades.
- The program keeps track of how many work and class hours the apprentice has completed in the ATM computer system. This system is used to track all apprentice activities and advancement to the next level and receive a wage increase. The program keeps the date of change in their computer system.
- To keep the apprentice on schedule the program will send out written notices on class schedules. 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) Our audit of the files found that all files reviewed had copies of the blue book. In addition, all work processes listed on the book were consistent with the program standards.

(2) The review found no evidence of employer evaluations in apprentice files. The program stated they have no process in place for employer periodic evaluation of apprentices' work performance. Apprentices are advanced based on the completion of on the job work hours and related and supplemental instruction school hours.
(3) The review found no evidence of disciplinary actions due to poor performance or excess absences. We also reviewed the programs committee minutes for the last 12 months and found no evidence of disciplinary actions or possible termination of apprentices. The program indicated there is a process in place for disciplinary action however they have not had any apprentices' needing to be subjected to disciplinary actions.

(b) **Recommendations**

(1) Continue to document all work hours and work processes and keep in apprentice individual files.

(2) The program needs to establish a procedure for employers to provide periodic evaluation of apprentices' job performance to the program. Report process to the DAS- **Due within 90 days**.

(3) The program must establish a system of documenting and maintaining records that will assist with the review and evaluation of the apprentices' progress in work performance. Report to the DAS- **Due within 90 days**.

(4) Document all disciplinary actions and keep in apprentice individual files. **Due within 60 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 Chabot-Loa Positas Community College District in Pleasanton, California. The classroom training center is located at:

Glendale- 900 Allen Ave., Glendale, CA 91120

Hayward- 25555 Hesperian Blvd, Building 300, Rm. 13 B, Hayward, CA 94545

Riverside- 1772 Container Circle, Riverside, CA 92509

Sacramento- 2440 Glendale Lane, Sacramento, CA 95825

San Diego- 2054 State Street, San Diego, CA 92101

In addition, a hybrid correspondence course with lab locations in Northern and Southern California located at:

1772 Container Circle, Riverside, CA 92509

3728 Imperial, Stockton, CA 95215

The apprentice files did not include records of attendance, classroom hours, and evaluations/grade reports from the instructor. These records are kept in file at the program office and entered into the Automated Tracking Management (ATM) system which is a database to document and track all apprentice activities. The apprentices will attend from 72 to 84 hours of instruction and are scheduled each semester. Each student is issued a calendar with the schedule of classes. Classes are held Tuesdays and Thursdays from 6:00 P.M. to 9:00 P.M., and second semester classes are instructed via hybrid Correspondence courses every Tuesday from 6:00 P.M. to 7:00 P.M.

Each instructor is required to complete an attendance roster and fax it to the program office at the end of each class.

The program uses the ATM system to track the apprentices' progress.

The apprentice files contained no record of absences related to school attendance. The files do not contain grade and completion reports. The program uses the ATM system to document the number of Related and Supplemental Instruction hours completed and the semester that each apprentice has completed for each individual apprentice.

The program indicated there are 6 semester classes in the program. An apprentice is enrolled in classes for semester 1 through 5 based on the class availability. The apprentice can be scheduled to attend classes out of succession without regard to the apprentice length of time in the program.
(a) **Findings**

(1) Our review found the program is providing the appropriate courses for this occupation.

(2) Training is not provided in a continuous manner. Apprentices are not being scheduled to attend class in sequence.

(3) The yearly number of related and supplemental instruction hours is not clear. The program indicated to the auditors the total number of hours for the entire program is 444, standards indicate the total number of hours is 480, and the program website indicates 525.

(4) The program indicated they began providing their hybrid correspondence course in August 2008 however; the course was approved by the LEA as of December 2008.

(5) The program has no record of instructors periodic evaluations for each apprentices' progress.

(b) **Recommendation**

(1) Develop a process to monitor apprentices' progress in related and supplemental instruction for all classroom instruction and hybrid correspondence courses and submit to the DAS. **Due within 60 days**

(2) Develop a process to provide and record periodic evaluation of each apprentice and submit to the DAS. **Due within 60 days**

(3) Develop a process to provide an organized and systematic form of instruction and submit to the DAS. **Due within 60 days**

(4) Review and clarify the total number of related and supplemental instruction hours provided per year and submit to the DAS. **Due within 30 days**

(5) Explore and provide updates to the program and the apprentice(s) on how the apprentice(s) is progressing in their required educational courses. 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.
5. 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.

The program is currently utilizing 5 training sites located in Glendale, Hayward, Riverside, Sacramento, San Diego and hybrid correspondence course with lab locations in Northern and Southern California. There are 7 certified instructors in this program. All instructors are dedicated part-time to assist in the instruction. The auditors spoke with two instructors at two separate training locations, Glendale and Riverside 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 hybrid correspondence courses are held once a week during the hours of 6:00 pm to 9:00 pm via telephone. In class training sessions are also held in the evening from 6:00 pm to 9:00 pm. The auditors were unable to verify the hybrid correspondence course due to their visits to the selected training locations which were being held at conflicting times.

(a) Findings

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

(2) The program has not submitted information to the DAS on the new hybrid correspondence course curriculum for approval as required.

(3) The auditors found one apprentice who was in attendance at a training site who indicated he has been attending training for a year. Upon further investigation, it was found that this apprentice was not on the active indentures apprentice list and had not been a registered apprentice with the program. The student was an ex employee of one of the participating employers. The program was not aware this person was participating in the apprentices’ training even though his name was documented on the attendance roster by the instructor.

(b) Recommendation

(1) The program should review attendance rosters submitted by instructors to verify all attendees are active indentured apprentices. Due within 60 days.

(2) The program must submit curriculum for the hybrid correspondence course to the DAS for approval. Due within 30 days.

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.
6. 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.

The review found the program does not have an established system to keep apprentices reasonably employed to provide them with continuing employment in the event of a layoff. The program stated they do not have a process in place to refer apprentices to work, they encourage the apprentice to find their own employment.

(a) Findings

(1) The program does not have a process in place to send out apprentices to non-union employers.

(b) Recommendation

(1) The program needs to develop a process to provide referrals to apprentices to keep them reasonably employed and maintain documentation in the apprentice file. Due within 30 day.

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.
7. 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 program provided a listing of all their job site locations to visit. Telephone calls were made to arrange a review of the job site and contact was made with two locations.

The auditor visited American Protection Industries in Inglewood, CA, and DC Electronics in Riverside, CA. The auditor found one apprentice working under the supervision and direction of a journeyman. The apprentices were employed at task defined within the work processes of the program standards. The auditor found two apprentices working without the supervision and direction of a journeyman. The apprentices indicated that they do not have a journeyman with them when they are performing a service call. When they are required to install or replace parts, a journeyman is always with them to supervise their work. The apprentices stated it was a normal practice for them to work without the supervision of a journeyman when performing service calls.

Interviews were conducted with the three 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 each apprentice writes in the total hours of training in the apprentice record form. The apprentices state they rely on their classroom instructor and journeyman to ensure they are completing a work process and OJT work hours. The form is signed by the job site supervisor validating the work processes and OJT work hours. The interview with one supervisor confirmed there is a proper ratio of journeyman to apprentice and adequate supervision.

(a) Findings

(1) The auditor found that two apprentices were working on a service call without the proper supervision of a journeyman as required by the program.

(2) It was found that apprentices are properly completing the blue OJT Record Books and have an understanding on how to properly document their work hours.
(b) **Recommendations**

(1) The program is to monitor job sites to ensure apprentices are adequately employed at the work processes, recording OJT work hours, working under the direction of a journeyman and paid the proper wage rates and benefits. It is the responsibility of the program to insure all employers are providing apprentices adequate journeyman supervision at all times. **Due within 60 days**

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 2008, as required.

(b) Recommendations

(1) Continue to submit the Self-Assessment Review and Program 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

Unilateral apprenticeship committees have do not 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 provided the program meeting minutes for the past year. The meetings are held quarterly, unless more meetings are necessary to address certain issues. The frequency of the meetings was established and written in a trust document. As a reminder, a one week advance notice is sent out to all members, DAS consultant and guest of the committee.

The programs rules and regulations state that this committee is an advisory panel. Also noted in the rules and regulations are the three (3) Apprentices and three (3) Management Trustees. The committee also includes the apprenticeship coordinator and Local Education Agency Representative (LEA).

The program stated that all disciplinary actions must be reviewed by the committee.

(a) Findings

(1) Our review of the committee minutes for the last 12 months found records of disciplinary actions reviews, assessments and evaluations of apprenticeship records.

(b) Recommendations

(1) The program committee should continue to document all disciplinary actions reviews, assessments and evaluations of apprenticeship records in their committee minutes.

(2) Ensure that DAS apprenticeship consultant is advised of committee meetings well in advance and the consultant will participate in meetings. Due 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)(h), 212(c)(1)(6) (9), 224 of the California Code of Regulations states that the program sponsor must maintain adequate documentation and records.
10. 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.

11. 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.

12. 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,

[Signature]

Alma Venable
Apprenticeship Consultant Auditor
DAS, Los Angeles District Office

Date: 7/06/09
Date: July 6, 2009

To: Western Burglar and Fire Alarm Association UATC
337 Washington Boulevard, #2
Marina Del Rey, California 9029
Att: Mr. Jerry Lenander

Ref: Apprenticeship Program Preliminary Audit Report

To Mr. Jerry Lenander:

The audit of the Western Burglar and Fire Alarm Association UATC 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 cover letter. The program now has 14 calendar 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.

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.

Sincerely,

[Signature]

Anna Venable
Apprenticeship Consultant Auditor
DAS Los Angeles Office
Attached please find the File#10837 Audit response. A copy is being send via Fed Ex today.

Thank you.

Alma Venable
Apprenticeship Consultant
Audit Unit

Dept of Industrial Relations
Div. of Apprenticeship Standards
Los Angeles
Cell: (213) 598-5716
Fax: (213) 576-7758
Main office #: (213) 576-7750

"Resolve to succeed. The greatest discovery one can make is that nothing is impossible"
Mr. Jerry Lenander,

The audit of the Western Burglar and Fire Alarm Association UATC 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 cover letter. The program now has 14 calendar days from the receipt of this email in which to review and submit comments on the report. A hardcopy of this report has been sent to you via mail. 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.

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Thank you, to both you and your staff for your assistance and cooperation during the audit.

Alma Venable
Apprenticeship Consultant
Audits Unit
July 17, 2009

Ms. Alma Venable
Apprenticeship Consultant Auditor
DAS Los Angeles Office
320 West Fourth Street, Room 830
Los Angeles, CA 90013

Dear Ms. Venable:

Enclosed is the response of the WBFAA UATC to the Preliminary Audit Report For Western Burglar & Fire Alarm Association UAC, File 10837 dated July 6, 2009.

We have responded to the recommendations that indicated a report to the DAS within a specified timeframe. The information is included in our response and in the attached Memorandum related to specific issues.

We have also included as an attachment the copies of WBFAA UATC requests for cancellations since September 2008.

The audit process was very beneficial in providing an opportunity to openly discuss the issues related to effectively managing the growth of our apprenticeship program in accordance with our standards. The committee and staff appreciated the opportunity to review the entire program which resulted in revised and new processes that will serve our apprentices. We appreciate the work you and Sal Trujillo did on behalf of our apprentices and our program.

Please contact me if you have any questions.

Sincerely,

Jerry Lenander
Training Coordinator

Enclosures
Response to Preliminary Audit with Memorandum
DAS 5 Submissions (November 6, 2008, April 27, 2009, June 19, 2009)
Review of Withdrawals Obtaining State Certification
RESPONSE TO PRELIMINARY AUDIT REPORT
For Western Burglar & Fire Alarm Association UAC, File 10837

PROGRAM COMPLETIONS
The program has not had program completions since the original program standards were signed in September 2002.

Following is the timeline for the approval and launch of the WBFAA UATC apprenticeship program:

1. The WBFAA UATC Apprentice Program Standards were approved by the DAS in September, 2002.
4. The first WBFAA UATC RSI class graduated in December 2007.
5. Five (5) WBFAA UATC Apprentices received a DAS Certificate of Completion dated May 14, 2009.

All active apprentices are currently assigned to RSI classes and we expect to be submitting request for DAS Completions with Certificates each semester. In addition, we will be submitting requests for DAS Completions without Certificates for those apprentices who inform us that they have obtained state certification.

STANDARDS
(1) Submit revision of current wages to the DAS. Due within 60 days.

The WBFAA UATC committee monitors wages on an ongoing basis and there has been no change in the current wages from our standards.

(2) Submit revision of standards to reflect correspondence training to the DAS. Due within 60 days.

The WBFAA UATC will report additional modes of delivery of RSI, including correspondence training, to the DAS.

The WBFAA UATC will report any required changes in standards to the DAS on an ongoing basis.

The WBFAA UATC has established an annual review of the standards and will submit revisions as required and has included the standards as part of the committee agenda.
RULES AND REGULATIONS
(1) Review Rules and Regulations Apprenticeship Guidebook annually and update to reflect the current changes in the program. Due within 60 days.

The WBFAA UATC has established an annual review of the Apprentice Handbook including policies and will submit any revised versions to the DAS for information purposes.

ACTIVE APPRENTICES AND CANCELLATIONS
Finding (1) The program had not requested cancellation requests for apprentices' that are no longer in the program since September 2008. The numbers of registered apprentices for this program is incorrect. The number of reported registered apprentices was 85, when in fact the program actually has 65 registered apprentices. Many of the allegedly active apprentices are no longer active apprentices in the program.

(1) The program shall keep the DAS informed of indentures, cancellations and completions in a timely manner. Report all cancellations to the DAS- Due within 60 days

(2) The program should submit a letter of completion (status 08) to the DAS once an apprentice has been issued a state certification and drops from the program. Due within 60 days.

(3) The program should continue to monitor the apprentice progress in the program at least every 30 days.

(4) All changes affecting the status of the apprentices in the program must be submitted to the DAS.

The WBFAAA UATC manages a process that reports all actions related to the status of an apprentice to the DAS including indenture and cancellations following action of the committee.

The WBFAA UATC transmitted cancellation requests for apprentices on the following dates:

<table>
<thead>
<tr>
<th>Date Transmitted</th>
<th>Request</th>
</tr>
</thead>
<tbody>
<tr>
<td>November 6, 2008</td>
<td>10 (ten) cancellations</td>
</tr>
<tr>
<td>April 27, 2009</td>
<td>18 (eighteen) cancellations</td>
</tr>
<tr>
<td>June 19, 2009</td>
<td>3 (three) cancellations (resubmitted July 15, 2009)</td>
</tr>
</tbody>
</table>

Each transmission included a request for a current DAS Active Apprentice Report. In addition, we made a request for an active apprentice roster from DAS on July 9, 2009.

The WBFAA UATC did not receive a current DAS Active Apprentice Report in response to the requests above.
We received a DAS Active Apprentice Report dated July 14, 2009 on July 15, 2009.

Our initial review indicated that the three (3) withdrawals reported to the DAS on June 19, 2009 remained on the DAS Active Apprentice Report.

The WBFAA UATC resubmitted the June 19, 2009 request for cancellations on July 15, 2009.

The WBFAA UATC will review and reconcile the DAS Active Apprentice Report with our records within five (5) days.

The WBFAA UATC has requested that the DAS provide a DAS Active Apprentice Report to the committee on a monthly basis and following any request for cancellation or indenture of an apprentice for the purpose of reconciliation.

APPRENTICE COMPLETION WITHOUT CERTIFICATE OF COMPLETION

The program was unaware that they had the ability to complete an apprentice without issuing a certificate of completion.

A review of the WBFAA UATC records indicates the following:
Active Apprentices Dropped Due to Certification 28

The WBFAA UATC is requesting that the DAS review the above cancellations to determine if their DAS record can be adjusted to status 08.

The issue of active apprentices dropping from the program when they received their state certification was discussed at each WBFAA UATC meeting. The twenty-eight (28) apprentices would have been submitted as completions if the WBFAA UATC had been made aware of the ability to submit them as completed cancellations without a certificate of completion.

The WBFAA UATC now submits apprentices who drop from the program due to obtaining their certification as completions without certification (status 08).

The WBFAA UATC is requesting that DAS make an administrative review of the withdraw apprentices (report attached) to determine if they can be status 08 (Completion Without Certificate of Completion).

On-The Job Training (OJT) PROGRESS RECORDS, ADVANCEMENTS AND EVALUATIONS

(2) The program needs to establish a procedure for employers to provide periodic evaluation of apprentices' job performance to the program. Report process to the DAS- Due within 90 days.
The WBFAA UATC has established a formal process of requesting employer evaluations every six months in conjunction with the upgrade reviews for each apprentice.

The WBFAA UATC has revised our integrated communications program to inform the employer and the apprentice to contact the training office when issues related to work performance at the time of the occurrence.

(3) The program must establish a system of documenting and maintaining records that will assist with the review and evaluation of the apprentices' progress in work performance. Report to the DAS – Due within 90 days.

The WBFAA UATC has established and implemented a procedure to review OJT, RSI and work performance of each apprentice every six months as part of their review for upgrade.

(4) Document all disciplinary actions and keep in apprentice individual files. Due within 60 days.

A Memorandum regarding conducting and documenting periodic evaluations is attached to this report. (See Page 8 and 9)

**RELATED AND SUPPLEMENTAL INSTRUCTION (RSI)**

(1) Develop a process to monitor apprentices' progress in related and supplemental instruction for all classroom instruction and hybrid correspondence courses and submit to the DAS. Due within 60 days

and

(2) Develop a process to provide and record periodic evaluation of each apprentice and submit to the DAS. Due within 60 days

A Memorandum regarding conducting and documenting periodic evaluations, including RSI, is attached to this report. (See Page 9)

(3) Develop a process to provide an organized and systematic form of instruction and submit to the DAS. Due within 60 days

The WBFAA UATC offers RSI in six semesters and the committee determined that an apprentice could be successfully assigned to semester one, two and three out of sequence.

The WBFAA UATC currently assigns all newly indentured apprentices to the first semester and a sequential assignment for the remaining RSI.

Those apprentices currently attending RSI out of sequence will be in sequence following the January, 2010 RSI assignment.

Our LEA approved the WBFAA UATC first semester of online training.
(4) Review and clarify the total number of related and supplemental instruction hours provided per year and submit to the DAS. **Due within 30 days.**

The WBFAA UATC provides RSI in six semesters (two each year) as follows:

<table>
<thead>
<tr>
<th>SEMESTER</th>
<th>CURRICULUM HOURS</th>
<th>LAB HOURS</th>
<th>TOTAL HOURS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Semester One</td>
<td>72</td>
<td>16</td>
<td>88</td>
</tr>
<tr>
<td>Semester Two</td>
<td>72</td>
<td>16</td>
<td>88</td>
</tr>
<tr>
<td>Semester Three</td>
<td>84</td>
<td>16</td>
<td>100</td>
</tr>
<tr>
<td>Semester Four</td>
<td>84</td>
<td>16</td>
<td>100</td>
</tr>
<tr>
<td>Semester Five</td>
<td>72</td>
<td>16</td>
<td>88</td>
</tr>
<tr>
<td>Semester Six</td>
<td>84</td>
<td>16</td>
<td>100</td>
</tr>
<tr>
<td><strong>TOTAL HOURS</strong></td>
<td><strong>468</strong></td>
<td><strong>96</strong></td>
<td><strong>564</strong></td>
</tr>
</tbody>
</table>

The WBFAA UATC will report the revised hours to the DAS with a DAS-24.

(5) Explore and provide updates to the program and the apprentice(s) on how the apprentice(s) is progressing in their required educational courses. Review curriculum and develop new courses to cover additional needs when needed.

A Memorandum regarding conducting and documenting periodic evaluations, including RSI, is attached to this report.

**TRAINING CENTER**

(1) The program should review attendance rosters submitted by instructors to verify all attendees are active indentured apprentices. **Due within 60 days.**

The WBFAA UATC has revised our process to review RSI class rosters to affirm that all apprentices assigned to a class are attending, that all apprentices attending class are indentured with the committee and DAS, and they are compliant with the program standards including being employed full time by a member company.

**PROCESS**

The WBFAA UATC follows the following process related to apprentice attendance an affirmation for RSI classes:

I. The instructor for each RSI course will get an official attendance roster from the Training Office on the week of the first course.

II. Additions or removals of any individual to the roster may not be made by the instructor without advising the Training Office.
III. An individual who shows up at class who is not on the roster will be reported to the Training Office and will be advised to contact the Training Office about becoming an apprentice in the program.

IV. The instructor must notify our office when an apprentice informs an instructor that they no longer wish to stay in the program, if they are no longer employed, or any other change in their status.

V. The instructor is to submit the attendance for each session by noon the following day.

VI. Once the Training Office receives the attendance from the instructor, any apprentice who was absent is sent an absence notice with a copy to the employer from the Training Office. A copy is placed in the apprentice file.

(2) The program must submit curriculum for the hybrid correspondence course to the DAS for approval. Due within 30 days.

The WBFAA UATC curriculum is approved by our LEA and we also submit new modes of delivery of the curriculum for approval by our LEA. The new modes of delivery do not affect the curriculum included in our standards, and any changes in the curriculum in our standards will be forwarded to the DAS.

The WBFAA UATC will provide our LEA a request for approval of new modes of delivery of curriculum, including hybrid correspondence and online, in advance of implementation of the course.

The WBFAA UATC will inform the DAS of any change in mode of delivery approved by our LEA.

MECHANISM TO KEEP APPRENTICES REASONABLY EMPLOYED
(1) The program needs to develop a process to provide referrals to apprentices to keep them reasonably employed and maintain documentation in the apprentice file. Due within 30 day.

The WBFAA UATC has reviewed the process regarding maintaining reasonable employment for apprentices.

A Memorandum regarding processes to maintain full time, reasonable employment for apprentices who are laid off by their employer. (See Page 10)
**JOB SITE VISIT**

(1) The program is to monitor job sites to ensure apprentices are adequately employed at the work processes, recording OJT work hours, working under the direction of a journeyman and paid the proper wage rates and benefits. It is the responsibility of the program to insure all employers are providing apprentices adequate journeyman supervision at all times. **Due within 60 days**

The WBFAA UATC has reviewed and revised the program to ensure that apprentices are receiving diverse work experience under the direction of a journeyman, including:

- Expanding orientation class for each semester to include review of OJT, journeyman supervision, wages, upgrades and advancement.
- Implemented a weekly E-Bulletin to all employers signatory to the WBFAA UATC as well as apprentices. The E-Bulletins contain pertinent information for the upcoming week and contains specific information which applies directly to the employer, and information which applies directly to the apprentice.
- The WBFAA UATC will investigate all inquires reported to the committee relating to apprentice OJT and supervision.

**COMMITTEE MEETINGS AND MINUTES OF MEETING**

(2) Ensure that DAS apprenticeship consultant is advised of committee meetings well in advance and the consultant will participate in meetings. **Due within 30 days.**

The WBFAA UATC mails notice meetings to the committee, DAS and LEA at least two weeks in advance of meetings. Following is a review of meetings, notice of meetings, and DAS attendance:

<table>
<thead>
<tr>
<th>MEETING DATE</th>
<th>NOTICE DATE</th>
<th>DAS ATTENDANCE</th>
</tr>
</thead>
<tbody>
<tr>
<td>August 1, 2007</td>
<td>May 31, 2007</td>
<td>Yes</td>
</tr>
<tr>
<td>March 18, 2008</td>
<td>February 14, 2008</td>
<td>Yes</td>
</tr>
<tr>
<td>May 29, 2008</td>
<td>April 22, 2008</td>
<td>Yes</td>
</tr>
<tr>
<td>October 9, 2008</td>
<td>September 23, 2008</td>
<td>No</td>
</tr>
<tr>
<td>March 17, 2009</td>
<td>February 26, 2009</td>
<td>Yes</td>
</tr>
<tr>
<td>May 13, 2009</td>
<td>April 14, 2009</td>
<td>No</td>
</tr>
<tr>
<td>July 21, 2009</td>
<td>June 9, 2009</td>
<td>NA (cancelled 7-14-09)</td>
</tr>
</tbody>
</table>

Meeting notices are sent in advance of the scheduled date with a minimum of two weeks. The committee requests reports be submitted 10 days in advance to be included on the agenda and in the Board packet.
MEMORANDUM REGARDING PROCEDURES TO DOCUMENT AND MAINTAIN FILES FOR CITATIONS AND DISCIPLINARY ACTIONS FOR ACTIVE APPRENTICES

The WBFAA DATC is guided by our policies on the responsibility of the apprentice to maintain good standing in the program. This includes reporting of work experience monthly (OJT) and satisfactorily completing the Related Supplemental Instruction (RSI).

ACTION

The WBFAA DATC has a process in place to send a letter of citation to an apprentice who is not complying with the standards and fulfilling their obligation to the program and the DAS. The WBFAA DATC maintains a copy of the letter of citation and documents related to any subsequent disciplinary action in the apprentice files. The employer of the apprentice also receives a copy of these documents.

PROCESS

1). Notice is sent on the 11th day of every month for any apprentice who has not turned in their OJT hours for the previous month.
   a). The apprentice is required to submit their OJT for the delinquent months within the 30 days.
   b). An apprentice who becomes two months delinquent on their OJT reporting is given a notice to respond within 30 days to request a meeting with the committee to show cause why they should not be removed from the program.

2). Notice is sent if an apprentice is absent from a schedule session of RSI.
   a). An apprentice who has a third unexcused or fourth total class absent is removed from the class and is given notice to respond within 30 days to request a meeting with the committee to show cause why they should not be removed from the program.

3). Notice is sent if an apprentice does not turn in weekly written assignment for RSI course.

4). Notice sent if apprentice does not attend the two lab sessions for RSI course.
   a). Each RSI semester has two mandatory lab courses. An apprentice who is absent from a lab session is given notice to respond within 30 days to request a meeting with the committee to show cause why they should not be removed from the program.

5). Notice sent if apprentice does not satisfactorily complete RSI course.
   a). An apprentice who does not satisfactorily complete the RSI course due to poor performance on weekly assignments and/or exams is given notice to respond within 30 days to request a meeting with the committee to show cause why they should not be removed from the program.

All notices sent to the apprentice are filed in the apprentice folder.

An apprentice who responds to a citation remains active in the program until the next committee meeting where the case is reviewed and by the committee.
MEMORANDUM REGARDING PROCEDURES TO MAINTAIN PERIODIC EVALUATIONS OF ACTIVE APPRENTICES BY EMPLOYER, INSTRUCTOR AND COMMITTEE

WBFAA UATC apprentices are required to be employed full time by a member company and perform work satisfactorily under the supervision of a journeyman. They are also required to submit monthly report of work experience (OJT) and successfully completed assigned Related Supplemental Instruction (RSI). The progress of the apprentice is evaluated on a weekly, monthly and biannual basis.

ACTION
The WBFAA UATC has developed and implemented a process to obtain employer evaluations of their active apprentices twice a year in conjunction with the upgrade review, instructor evaluations once each semester, and monthly review of apprentice by the Training Office.

PROCESS:
I. Forward the employer an Apprentice Evaluation Form for each apprentice thirty (30) days in advance of the upgrade review.

II. Employer evaluation of the apprentice will be returned to the WBFAA UATC Training Office within ten (10) business days of the date of the letter.

III. Completed employer evaluations should be filed in the apprentice folder.

IV. All evaluations submitted will be reviewed at the next committee meeting as part of the upgrade approval process.

V. Any action taken by the committee will be carried out by the Training Office and documented in the apprentice file.

VI. Instructor evaluation will be returned to the office within ten (10) business days of the mid-term class meeting.

VII. Training Office will review apprentice OJT reporting on a monthly basis and RSI participation on a weekly basis while class is in session.

VIII. The WBFAA UATC has integrated information on work performance and apprentice compliance in our communication with employers, apprentices, journeymen and instructors. This includes encouraging contact with the Training Office for remedial support when needed.
MEMORANDUM REGARDING PROCEDURES
TO MAINTAIN REASONABLE EMPLOYMENT FOR ACTIVE APPRENTICES LAID OFF FOR LACK OF WORK OR VOLUNTARY QUIT

The WBFAA UATC apprentices are required to be hired full time by a member company in order to be registered with the program and the DAS. The goal of the committee is to support the pursuit of full time employment of active apprentices.

ACTION
The WBFAA UATC has developed and implemented a procedure for tracking apprentices who have left their employer and indicated that they want to remain as an active apprentice in the program.

PROCESS:

I. The apprentice is placed at the top of the Apprentice Applicant List.

II. The apprentice will be provided with a list of member companies including primary contact, location and contact information.

III. Apprentice will be contacted after seven (7) days to determine if employment has been established with another member company.

IV. Apprentice will be contacted every thirty (30) days thereafter to determine if employment has been established with another member company.

V. If an apprentice is employed by a company who is not a member of the WBFAA UATC, the committee will contact the company to encourage them to join the apprenticeship program.

V. If apprentice is not employed by a member company after three months or beginning of next semester, whichever is longer, the apprentice will be withdrawn as an active apprentice from the program.

a). Apprentice may complete current semester of RSI but will not be allowed to start the next semester until they are employed by a member company.
WBFAA UATC CANCELLED APPRENTICE ROSTER
OBTAINED FIRE/LIFE SAFETY CERTIFICATION
JULY 15, 2009

<table>
<thead>
<tr>
<th>WBFAA ID</th>
<th>APPRENTICE NAME</th>
<th>STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1577</td>
<td>Berry, Randy</td>
<td>Passed Fire/Life Safety Certification Exam</td>
</tr>
<tr>
<td>1594</td>
<td>Candia, Juan</td>
<td>Passed Fire/Life Safety Certification Exam</td>
</tr>
<tr>
<td>1548</td>
<td>Candia, Luis</td>
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<td>1908</td>
<td>Carroll, Pamela</td>
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<td>1518</td>
<td>Connolly, Michael</td>
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<td>1781</td>
<td>Crunk, Daniel</td>
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<td>Curiel, Ernesto</td>
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<td>Hopper, Lee</td>
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<td>McPeters, Stephen</td>
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<td>Miller, Robert</td>
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</tr>
<tr>
<td>1724</td>
<td>Perez, Robert</td>
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<tr>
<td>1576</td>
<td>Saucier, George</td>
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<td>Schluter, Chad</td>
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<td>Stout, Bryan</td>
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<td>1773</td>
<td>Taylor, James</td>
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<tr>
<td>1692</td>
<td>Tien, Phu</td>
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<tr>
<td>1668</td>
<td>Valencia, Ramon</td>
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<td>Vargas, Alphonso</td>
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<td>Vitug, Mario</td>
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<tr>
<td>1496</td>
<td>Williams, Chance</td>
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<td>1702</td>
<td>Wilmoth, Josh</td>
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<tr>
<td>1571</td>
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</tr>
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<td>1547</td>
<td>Zamora, Gabriel</td>
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</tbody>
</table>