DIR ENFORCEMENT OF SKILLED AND TRAINED WORKFORCE REQUIREMENTS
Agenda

- Projects Covered
- Requirements
- Enforcement
  - By the Awarding Body/Public Agency
  - By the Labor Commissioner
  - Safe Harbor
- Reporting
PROJECTS COVERED
Under existing (pre–2019) law:

- Public Contract Code sections 2600–2601 (SB 693), established provisions to be generally applicable when a public entity is required by statute to obtain an enforceable commitment that a bidder, contractor, or other entity will use a skilled and trained workforce to complete a contract or project.
### SKILLED & TRAINED WORKFORCE REQUIREMENTS

Skilled workforce required under PCC §2600 et seq. applies to the following procurements:

- **City, County, and Other Specified State and Local Agencies Design-Build ≥ $1 Million**
  - Reference PCC §10191 and PCC §22162-22164
- **School District K-12 Design-Build ≥ $1 Million**
  - Reference EdC §7250.25
- **School District K-12 Lease-Leaseback**
  - Reference EdC §7407.5
- **City of San Diego Construction Manager at Risk ≥ $25 Million**
  - Reference PCC §20175
- **San Diego County Construction Manager at Risk ≥ $1 Million**
  - Reference PCC §20146
- **Best Value – Alameda, Los Angeles, Riverside, San Bernardino, San Diego, Solano, and Yuba County ≥ $1 Million**
  - Reference PCC §20155.2
- **SANDAG, MTS, and NCTD ≥ $1 Million**
  - Reference PUC §12220.1, PUC §125222.5, and PUC §122354.7
- **Housing Development Approvals**
  - Reference GovC §65913 et seq. (§65913.4)¹

¹ Requires compliance with POC §2600 et seq. and has its own penalty provisions.

### Projects Covered

**As of January 1, 2019**

- **30%** Contractors must have at least 30% journeypersons be graduates of an apprenticeship program in the following trades:
  - Acoustical installer
  - Bricklayer
  - Carpenter
  - Cement mason
  - Drywall installer or lather
  - Marble mason, setter, finisher
  - Modular furniture or systems installer
  - Operating engineer
  - Pile driver
  - Plasterer
  - Roofer
  - Waterproofer
  - Stone mason
  - Surveyor
  - Terrazzo worker or finisher
  - Tile layer, setter, finisher

For occupations with no approved apprenticeship program before 1995 (such as Laborers), up to one-half of the graduation percentage can be journeypersons who started working in the occupation before the apprenticeship program was approved.

**40% by January 1, 2018**
  - For all other apprenticeable trades—except teamsters—annual graduation rate requirements increase per the schedule below:

<table>
<thead>
<tr>
<th>Trade</th>
<th>Graduation Rate</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acoustical installer</td>
<td>40%</td>
<td>January 1, 2018</td>
</tr>
<tr>
<td>Bricklayer</td>
<td>50%</td>
<td>January 1, 2019</td>
</tr>
<tr>
<td>Carpenter</td>
<td>50%</td>
<td>January 1, 2019</td>
</tr>
<tr>
<td>Cement mason</td>
<td>60%</td>
<td>January 1, 2020</td>
</tr>
<tr>
<td>Drywall installer or lather</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Marble mason, setter, finisher</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Modular furniture or systems installer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operating engineer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pile driver</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Plasterer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Roofer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Waterproofer</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stone mason</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Surveyor</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Terrazzo worker or finisher</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tile layer, setter, finisher</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
REQUIREMENTS
What is required?

Skilled & Trained
What is “Skilled?”

All the workers performing work in an apprenticeable occupation in the building and construction trades are either skilled journeypersons or apprentices in an apprenticeship program approved by the Chief of the DAS.
“Skilled Journeyperson” = a worker who has either:

- Graduated from an apprenticeship program (California or federally approved), or
- At least as many hours of on-the-job experience in the applicable occupation as would be required to graduate from an approved California apprenticeship program.
What is “Trained?”

**SKILLED & TRAINED WORKFORCE REQUIREMENTS**

Skilled workforce required under PCC §3600 et seq. applies to the following procurements:

- City, County, and Other Specified State and Local Agencies Design-Build > $1 Million
- Reference PCC §1019 and PCC §322162 §22164
- School District K-12 Design-Build > $1 Million
- Reference EdC §1750 §25
- School District K-12 Lease-Leaseback
  - Reference EdC §1750 §75
- City of San Diego Construction Manager at Risk > $25 Million
  - Reference PCC §20175
- San Diego County Construction Manager at Risk > $1 Million
  - Reference PCC §20146
- Best Value - Los Angeles Unified > $1 Million
  - Reference PCC §20191
- Best Value - Alameda, Los Angeles, Riverside, San Bernardino, San Diego, Solano, and Yuba County > $1 Million
  - Reference PCC §20191
- SANDAG, MTS, and NCTD > $1 Million
  - Reference PUC §120225 §15, PUC §125222 §5, and PUC §13253 §47
- Housing Development Approvals
  - Reference Gov C §65593.4 et seq. (§65593.4)

*Requires compliance with PCC §2000 et seq. and has its own penalty provisions.

**REQUIREMENTS**

As of January 1, 2019

- Contractors must have at least 30% of journeymen be graduates of an apprenticeship program for the following trades:
  - Acoustical installer
  - Bricklayer
  - Carpenter
  - Cement mason
  - Drywall installer or finisher
  - Marble mason, setter, finisher
  - Modular furniture or systems installer
  - Operating engineer
  - Pile driver
  - Plasterer
  - Roofer
  - Waterproofer
  - Stone mason
  - Surveyor
  - Terrazzo worker or finisher
  - Tile layer, setter, finisher

For all other apprenticeable trades – except teamsters – annual graduation rate requirements increase per the schedule below:

- 40% by January 1, 2018
- 50% by January 1, 2019
- 60% by January 1, 2020

*This requirement does not apply to teamsters.

For occupations with no approved apprenticeship program before 1995 (such as Laborers), up to one half of the graduation percentage can be journeymen who started working in the occupation before the apprenticeship program was approved.
ENFORCEMENT
AB 3018
ENFORCEMENT UPDATE TO SKILLED AND TRAINED WORKFORCE

Amends Sections 2601–2602 and Adds Section 2603 of the Public Contract Code.
What must you do to comply?

Provide the awarding body, on a monthly basis while the project is being performed, a report demonstrating compliance.

*PCC § 2602 (a)(2)*
What can the awarding body do if a monthly report is not provided, or is incomplete?

- Withhold further payments until a complete report is provided.

*PCC § 2602 (b)*
What if a monthly report is incomplete due to the failure of a subcontractor to timely submit the required information?

- The awarding body and the general contractor shall withhold 150% of the value of the monthly billing for that subcontractor.
What if a monthly report does not demonstrate compliance?

The awarding body shall:

1) Withhold further payment until a plan is provided to achieve substantial compliance prior to completion of the contract or project
2) Forward a copy of the monthly report to the Labor Commissioner
3) Forward a copy of the plan to achieve substantial compliance to the Labor Commissioner

*PCC § 2602 (c)(1)–(3)*
How much can an awarding body withhold?

150% of the value of the monthly billing for the entity or subcontractor that failed to comply.

*PCC § 2602 (c)(1)(A)*
If any awarding body withholds, a contractor may withhold the same amount from a subcontractor that did not demonstrate compliance.

*PCC § 2602 (c)(1)(A)*
Labor Commissioner Penalties

- Up to $5,000 per month of work performed in violation of this chapter.
- For a second or subsequent violation within a three-year period: $10,000 per month of work performed.

*PCC § 2603 (a)*
The Labor Commissioner has discretion to reduce or waive the amount of this penalty:

1) If the violation was not intentional
2) If the contractor has not committed other violations of this chapter or of the Labor Code
3) If upon notice of the violation, the contractor took steps to voluntarily remedy the violation
4) Depending on the extent or severity of the violation
5) If the contractor submitted and followed a plan to achieve substantial compliance

*PCC § 2602 (b)*
The Labor Commissioner shall issue a civil wage and penalty assessment, under Labor Code § 1742 and the prevailing wage regulations.

PCC § 2603 (d)
Safe Harbor

No penalties for a subcontractor’s failure to comply if the contractor did not have knowledge and:

1) Included a copy of this chapter in the subcontract (for contracts entered into on or after January 1, 2019);
2) Periodically monitored the subcontractor's use of a skilled and trained workforce;
3) Took corrective action upon becoming aware of a failure, including, but not limited to, retaining 150% of the amount due to the subcontractor for work performed on the project until the failure is corrected; and
4) Obtained a sworn declaration of compliance from the subcontractor prior to making final payment.
Debarment

- When a violation of this chapter is “with intent to defraud:”
  - 1–3 years debarment (no bidding, no award, no performing work on a public works project)

- When 2 or more separate “willful” violations of this chapter with in a three-year period:
  - Up to 3 years debarment

*PCC § 2603 (h)–(i)*
In Summary:

**"SKILLED"**

100% must be “Skilled”

<table>
<thead>
<tr>
<th>“SKILLED”</th>
<th>“TRAINED”</th>
<th>50%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contractors must have at least 30% of journeypersons be graduates of apprenticeship program for following trades:</td>
<td>Pile driver</td>
<td>30%</td>
</tr>
<tr>
<td>Acoustical installer</td>
<td>Plasterer</td>
<td></td>
</tr>
<tr>
<td>Bricklayer</td>
<td>Roofer</td>
<td></td>
</tr>
<tr>
<td>Carpenter</td>
<td>Waterproofer</td>
<td></td>
</tr>
<tr>
<td>Cement mason</td>
<td>Stone mason</td>
<td></td>
</tr>
<tr>
<td>Drywall installer or lather</td>
<td>Surveyor</td>
<td></td>
</tr>
<tr>
<td>Marble mason, setter, or finisher</td>
<td>Terrazzo worker or finisher</td>
<td></td>
</tr>
<tr>
<td>Modular furniture or systems installer</td>
<td>Tile layer, setter, or finisher</td>
<td></td>
</tr>
<tr>
<td>Operating engineer</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Annual graduation rate requirement as of January 1, 2019 for all other apprenticeable trades (except teamsters)

Increases to 60% on January 1, 2020
REPORTING

DIR Enforcement of Skilled & Trained Workforce Requirements
ATTACHMENT NO. “__”

Skilled and Trained Workforce
(Public Contract Code section 2600 et seq.)

For Use on Certain California Public Works Projects, As Applicable

Subcontractor understands that the Subcontract Work and Subcontract Documents may require compliance with Public Contract Code section 2600 et seq. regarding the use of workers in apprenticeable occupations. Subcontractor shall provide workers to the project that are skilled journeypersons and graduates of approved apprenticeship programs in the required percentage as set forth in the Public Contract Code. Subcontractor agrees to comply with the requirements in effect during performance of the Subcontract Work on the project with respect to all of Subcontractor’s workers. Subcontractor shall provide a completed report demonstrating its compliance with these requirements on a monthly basis. The report shall be in the form required by the Prime Contract or in the form below if no form is provided by Owner in Prime Contract.

MONTHLY REPORT

Month: _____________ 20__

In accordance with Public Contract Code section 2600 et seq., all the workers of __________________________________ [INSERT NAME OF SUBCONTRACTOR] performing work in an apprenticeable occupation in the building and construction trades on the project known as ________________________________________________________________________________________ [INSERT PROJECT NAME AND LOCATION] are either skilled journeypersons or apprentices registered in an apprenticeship program approved by the Chief of the Division of Apprenticeship Standards of the California Department of Industrial Relations (the “Chief”). “Skilled journeyperson” means a worker who either:

(1) Graduated from an apprenticeship program for the applicable occupation that was approved by the Chief or located outside California and approved for federal purposes pursuant to the apprenticeship regulations adopted by the Federal Secretary of Labor, or

(2) Has at least as many hours of on-the-job-experience in the applicable occupation as would be required to graduate from an apprenticeship program for the applicable occupation that is approved by the Chief.

In addition, the required percentage of the skilled journeypersons employed by __________________________________ [INSERT NAME OF SUBCONTRACTOR] to perform work on the project are graduates of an apprenticeship program for the applicable occupation.1 A graduate of an apprenticeship program means either of the following:

(1) An individual that has been issued a certificate of completion under authority of the California Apprenticeship Council for completing an apprenticeship program approved by the Chief pursuant to Section 3075 of the Labor Code; or

(2) An individual that has completed an apprenticeship program located outside California and approved for federal purposes pursuant to the apprenticeship regulations adopted by the federal Secretary of Labor.

Exhibit A shall be utilized to demonstrate that all workers are either skilled journeypersons or apprentices registered in an apprenticeship program, pursuant to Public Contract Code Section 2601, subdivision (d)(1). Either Exhibit B or C must be completed to demonstrate compliance with Skilled and Trained Workforce “graduate” requirements, pursuant to Public Contract Code Section 2601, subdivision (d)(2). Exhibits are to be completed for each trade utilized by subcontractor.

Subcontractor declares under penalty of perjury the information provided in Exhibits A – C is true and correct. Subcontractor additionally declares under penalty of perjury that any and all documentary proof supporting the information provided in Exhibits A – C is in Subcontractor’s possession and will be supplied upon request.

Date: _________________  Subcontractor:  __________________________________
Signature:  __________________________________
Title:   __________________________________

---

1 Skilled journeypersons employed to perform work on the project by Contractor or its subcontractors at every tier must be graduates of an apprenticeship program for the applicable occupation at the following percentages per Section 2601: at least 30 percent for work performed on or after January 1, 2017; at least 40 percent for work performed on or after January 1, 2018; at least 50 percent for work performed on or after January 1, 2019; and at least 60 percent for work performed on or after January 1, 2020. The increases for 2018, 2019, and 2020 shall not apply to the following occupations: acoustical installer, bricklayer, carpenter, cement mason, drywall installer or lather, marble mason, finisher, or setter, modular furniture or systems installer, operating engineer, pile driver, plasterer, roofer or waterproofer, stone mason, surveyor, terrain worker or finisher, and tile layer, setter, or finisher. A percentage of graduates does not apply to the teamster occupation.
DIR ENFORCEMENT OF SKILLED & TRAINED WORKFORCE REQUIREMENTS: REPORTING

EXHIBIT A: __________ [Insert Month] REQUIREMENT OF SKILLED JOURNEYPERSONS OR APPRENTICES

<table>
<thead>
<tr>
<th>Name of Employee</th>
<th>Journeyperson who Graduated from Apprentice Program (Yes/No)</th>
<th>Journeyperson with Sufficient On-The-Job Experience (Yes/No)</th>
<th>Apprentices Registered in an Approved Program (Yes/No)</th>
</tr>
</thead>
</table>

[Identify each worker as one of the following]

I declare, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct and complies with Public Contract Code Section 2601, subdivisions (d)(1) and (a).

Signature: _____________________________
Print Name: _____________________________
Subcontractor: _____________________________
Date: ____________________________________

** See attached plan to achieve substantial compliance per PCC § 2602 if Subcontractor falls short of required percentage of participation.

EXHIBIT B: __________ [Insert Month] HEADCOUNT OF APPRENTICESHIP GRADUATES

List all Skilled Journeypersons in ________ [applicable occupation/trade] Classification

Total Number of Apprenticeship Graduates Worked in ________ [applicable occupation] Classification

Total Number of Skilled Journeypersons Worked in ________ [applicable occupation] Classification

\[
\text{Total Number of Apprenticeship Graduates Worked in } \text{Classification } \times 100\% = \text{Total Number of Skilled Journeypersons Worked in } \text{Classification } \\
\]

\[
\text{I declare, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct and complies with Public Contract Code Sections } 2601(d)(2) - (4).
\]

Signature: _____________________________
Print Name: _____________________________
Subcontractor: _____________________________
Date: ____________________________________

** See attached plan to achieve substantial compliance per PCC § 2602 if Subcontractor falls short of required percentage of participation.

EXHIBIT C: __________ [Insert Month] HOURS WORKED OF APPRENTICESHIP GRADUATES

List all Skilled Journeypersons in ________ [applicable occupation/trade] Classification

Name of Skilled Journeyperson | Last 4 Digits of Social Security | Name of Apprenticeship Program or Meets § 2601, Subdivision (d)(3) Exception | Graduation Documentation on File? (Yes/No) |
|-----------------------------|--------------------------------|-------------------------------------------------|---------------------------------|

Total Hours of Apprenticeship Graduates Worked in ________ [applicable occupation] Classification

Total Hours of Skilled Journeypersons Worked in ________ [applicable occupation] Classification

\[
\text{Total Hours of Apprenticeship Graduates Worked in } \text{Classification } \times 100\% = \text{Total Hours of Skilled Journeypersons Worked in } \text{Classification } \\
\]

\[
\text{I declare, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct and complies with Public Contract Code Section } 2601(d)(2) - (4).
\]

Signature: _____________________________
Print Name: _____________________________
Subcontractor: _____________________________
Date: ____________________________________

** See attached plan to achieve substantial compliance per PCC § 2602 if Subcontractor falls short of required percentage of participation.
**Exhibit A**

**EXHIBIT A:**

[Insert Month] REQUIREMENT OF SKILLED JOURNEYPERSONS OR APPRENTICES

<table>
<thead>
<tr>
<th>Name of Employee</th>
<th>Journeyperson who Graduated from Apprentice Program (Yes/No)</th>
<th>Journeyperson with Sufficient On-the-Job Experience (Yes/No)</th>
<th>Apprentice Registered in an Approved Program (Yes/No)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Documents to Prove On-the-Job Experience

- Worker Affidavit
- Employer Affidavit
- W-2s or Other Back-up
**DIR ENFORCEMENT OF SKILLED & TRAINED WORKFORCE REQUIREMENTS: REPORTING**

**Hours of On-the-Job Training: Required Minimum Industry Training Criteria**

<table>
<thead>
<tr>
<th>CRAFT</th>
<th>HOURS</th>
<th>CRAFT</th>
<th>HOURS</th>
<th>CRAFT</th>
<th>HOURS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air Conditioning and Refrigeration</td>
<td>7,500</td>
<td>Elevator Constructor</td>
<td>6,800</td>
<td>Terrazzo Finisher</td>
<td>2,800</td>
</tr>
<tr>
<td>Acoustical Installer</td>
<td>3,600</td>
<td>Field Ironworker</td>
<td>4,800</td>
<td>Terrazzo Worker</td>
<td>4,200</td>
</tr>
<tr>
<td>Cabinet Maker</td>
<td>4,800</td>
<td>Floor Covering Installer</td>
<td>6,000</td>
<td>Operating Engineer</td>
<td>6,000</td>
</tr>
<tr>
<td>Carpentry</td>
<td>4,800</td>
<td>Glazier, Architectural, Metal and Glass Workers</td>
<td>7,500</td>
<td>Fire Sprinkler Fitter</td>
<td>7,000</td>
</tr>
<tr>
<td>Drywall Applicator</td>
<td>4,800</td>
<td>Heat &amp; Frost Insulators and Asbestos Workers</td>
<td>6,000</td>
<td>Landscape &amp; Irrigation Pipefitter</td>
<td>9,000</td>
</tr>
<tr>
<td>Hardwood Floor Layer</td>
<td>3,600</td>
<td>Drywall Finisher</td>
<td>3,600</td>
<td>Utility Pipeline Installer</td>
<td>7,800</td>
</tr>
<tr>
<td>Insulator</td>
<td>3,600</td>
<td>Industrial Painter</td>
<td>7,200</td>
<td>Plastering</td>
<td>6,000</td>
</tr>
<tr>
<td>Modular Installer</td>
<td>2,400</td>
<td>Painter, Decorator &amp; Paperhanger</td>
<td>4,800</td>
<td>Plumbing</td>
<td>7,200</td>
</tr>
<tr>
<td>Millwright</td>
<td>4,800</td>
<td>Construction Craft Laborer</td>
<td>3,000</td>
<td>Roofer &amp; Waterproofing</td>
<td>4,000</td>
</tr>
<tr>
<td>Pile Driver</td>
<td>4,800</td>
<td>Plaster Tender</td>
<td>3,000</td>
<td>Sheet Metal</td>
<td>6,500</td>
</tr>
<tr>
<td>Scaffold Erector</td>
<td>4,800</td>
<td>Bricklayer</td>
<td>4,200</td>
<td>Sound and Communication</td>
<td>4,800</td>
</tr>
<tr>
<td>Shingler</td>
<td>2,400</td>
<td>Marble Finisher</td>
<td>3,500</td>
<td>Steamfitter, Pipefitter</td>
<td>7,500</td>
</tr>
<tr>
<td>Cement Mason</td>
<td>4,200</td>
<td>Marble Mason/Setter</td>
<td>4,200</td>
<td>Surveyor</td>
<td>8,000</td>
</tr>
<tr>
<td>Electrician—Commercial</td>
<td>8,000</td>
<td>Mason Finisher</td>
<td>2,400</td>
<td>Tile Finisher</td>
<td>2,100</td>
</tr>
<tr>
<td>Electrician—Residential</td>
<td>4,800</td>
<td>Pointer Cleaner Caulker</td>
<td>4,200</td>
<td>Tile Layer</td>
<td>4,500</td>
</tr>
</tbody>
</table>

**FINCH THORNTON BAIRD**
ATTORNEYS AT LAW
DIR ENFORCEMENT OF SKILLED & TRAINED WORKFORCE REQUIREMENTS: REPORTING

Exhibit B

EXHIBIT B:
___________ [Insert Month] HEADCOUNT OF APPRENTICESHIP GRADUATES

<table>
<thead>
<tr>
<th>Name of Skilled Journeyperson</th>
<th>Last 4 Digits of Social Security</th>
<th>Graduate of Apprenticeship Program? (Yes/No)</th>
<th>Name of Apprenticeship Program or Meets § 2601, Subdivision (d)(3) Exception</th>
<th>Graduation Documentation on File? (Yes/No)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

** See attached plan to achieve substantial compliance per PCC § 2602 if Subcontractor falls short of required percentage of participation.
DIR ENFORCEMENT OF SKILLED & TRAINED WORKFORCE REQUIREMENTS: REPORTING

Exhibit C

EXHIBIT C:

[Insert Month] HOURS WORKED OF APPRENTICESHIP GRADUATES

<table>
<thead>
<tr>
<th>Name of Skilled Journeyperson</th>
<th>Last 4 Digits of Social Security</th>
<th>Graduate of Apprenticeship Program? (Yes/No)</th>
<th>Name of Apprenticeship Program or Meets § 2601, Subdivision (d)(3) Exception</th>
<th>Graduation Documentation on file? (Yes/No)</th>
<th>Total Hours Worked</th>
</tr>
</thead>
</table>

** See attached plan to achieve substantial compliance per PCC § 2602 if Subcontractor falls short of required percentage of participation.
Documents to Prove Graduation

- Diploma or certificate from the Apprenticeship Program
- DOL Certificate (for out-of-state program)
- Affidavit or declaration from the graduate or from a Program representative
- DIR Apprenticeship Status Website www.dir.ca.gov/das/appcertpw/AppCertSearch.asp

* A Journeyman Card is not sufficient!
These materials are general in nature and do not create any attorney-client relationship. These materials should in no way be relied upon or construed as legal advice, particularly since most legal outcomes are highly dependent on the facts of a particular matter. These materials are illustrative and for educational purposes only and should not be used as examples for actual use. The reader or recipient should consult with a lawyer on any legal issue concerning the topics of these materials.