SUCCESSFUL ON-THE-JOB TRAINING

APPRENTICESHIP VS. TRAINEE PROGRAMS ON FEDERAL HIGHWAY ADMINISTRATION (FWHA) PROJECTS IN ALASKA

A 2010 Alaska Department of Transportation & Public Facilities Training Program Review shows apprenticeship programs improve the skills of women and minorities so they have the opportunity and access to higher paying skilled trade jobs and achieve journeyworker status.

K. Scott, Alaska Department of Transportation & Public Facilities, Civil Rights Office, Anchorage, AK

Alaska Department of Transportation and Public Facilities

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1200 New Jersey Avenue SE, 8th F. E81-314
Washington, D.C. 20590
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PURPOSE

The purpose of this study is to measure the effectiveness of both trainees and apprentices in the Alaska Department of Transportation and Public Facilities On-the-Job Training (OJT) Program. Current information will prove or dissuade the notion that the Training Program component is not delivering a trained workforce. The purpose of this study is to measure the success based upon federally-mandated objectives.

OVERVIEW OF THE OJT PROGRAM

The Alaska Department of Transportation and Public Facilities (here on, the Department) has instituted the OJT Program in the Statewide Special Provisions Section 645, under 23 CFR 230 Subpart A (Equal Employment Opportunity on Federal and Federal-Aid Construction Contracts (Including Supportive Services)) for Federal Highway Administration (FHWA) projects.

Federal and State law require a workplace free of discrimination. It is required under the Department's federal aid agreement with FHWA that a training program be developed to facilitate women and minority employees' entry into the construction trades to diversify its workforce. The objectives of the Department's OJT Program are to

I. provide training and improve the skills of women, minorities, and disadvantaged persons so that they have the opportunity to access higher paying skilled trade jobs and achieve journeyworker status, and

II. broaden the labor pool to meet the projected future labor needs in the construction industry

The OJT requirements under 23 CFR 230 Subpart A for FHWA projects contain the following directive to state highway agencies:

> (1) Apprenticeship programs approved by the U.S. Department of Labor as of the date of proposed use by a Federal-aid highway contractor or subcontractor need not be formally approved by the State highway agency or the FHWA division Administrator. Such programs, including their minimum wage provisions, are acceptable for use provided they are administered in a manner reasonably calculated to meet the equal employment opportunity obligations of the contractor.
>
> (2) Other training programs approved by the U.S. Department of Labor as of the date of proposed use by a Federal-aid highway contractor or subcontractor are also acceptable for use without the formal approval of the State highway agency or the division Administrator provided.

The Department's Statewide Special Provisions Section 645 implements 23 CFR 230 Subpart A (Appendix A, Statewide Special Provisions Section 645 Training Program). To meet §645 Training Program requirements of a FHWA-funded highway contract, a construction contractor has two programs from which to choose.

(1) U.S. Department of Labor Apprentice Program: The USDOL Apprentice Program is a registered apprenticeship program through the U.S. Department of Labor, Office of Apprenticeship (USDOL/OA), formally known as the Bureau of Apprenticeship and Training (BAT). A registered apprenticeship program is a formalized, structured training program combining on-the-job training and related technical instruction in which paid employees receive practical and technical training in a highly skilled occupation. Apprentices dispatched from the USDOL Apprentice Program are paid in accordance of their approved program based upon mandated percentages of journeyworker wages. Construction contractors determine the distribution of the required number of apprentices among the various work classifications based upon the type of work to be performed.

(2) A Training Program approved by the Department's Civil Rights Office (CRO): Contractors must develop a training schedule (Form 25A-310, Appendix B) for each job classification they intend to use on a project. The training programs are approved prior to contract award. For Department approval, training programs must be at a minimum of 500 hours. Once the trainee completes the training with the contractor, they must receive journeyworker wages with that contractor.

Each area of the Training Program schedule contains specific information, including the number of hours allotted. Each training program contains the following:

TRAINING SCHEDULE COMPONENT	REQUIREMENTS
Orientation & Observation	The introductory unit will include construction basics, traffic flow, basic skills, crafts involved on project, etc.
Care and Maintenance/Special Preparations	The contractor will list the basic skills and activities which prepare the trainee(s) for maintenance and care of tools/equipment required in this job classification.
Applied Techniques and/or Methods	The training plan will include the manipulation of tools/equipment, patterns or processes involved, coordination with other equipment and/or crafts, etc.
Actual Application/Operation	The contractor must specify the activities and the general order in which they will be taught/practiced where the trainee applies the knowledge learned in the items listed above.
Off-site Instruction	Optional
Wages	Trainees will be paid prevailing Davis-Bacon as indicated: First half of the training period - fringe benefits plus at least 60 (but less than 100) percent of the

	appropriate minimum journey rate specified in the contract. Third quarter of the training period - fringe benefits plus at least 75 (but less than 100) percent of the appropriate minimum journey rate specified in the contract. Last quarter of the training period - fringe benefits plus at least 90 (but less than 100) percent of the appropriate minimum journey rate specified in the contract.
Evaluation	The contractor will provide a documented evaluation of the trainee(s)' performance on the job upon completion of each item listed in the Training Schedule above.

Table 1: OJT Trainee Program Requirements (Source: Statewide Special Provisions Section 645 Training Program)

A copy of the approved training program is given to the trainee as well as a copy of the evaluations. Once the trainee completes the contractor's program, s/he is considered a journeyworker with that contractor. Completion of the contractor's training program does not supersede the overall training program requirements established by the USDOL/OA for each job classification or related craft. That is, contractors who choose to train a person in welding will not establish that trainee as a journeyworker welder without the completion of a USDOL Registered Apprenticeship program.

The objectives of the OJT requirements under 23 CFR 230 Subpart A can be measured by answering the following questions:

- Does the Department's training options provide training to improve the skills of women and minorities? (page 6)
- Have our training options broadened the labor pool to meet the projected future labor needs in the construction industry? (page 8)
- Are those women and minorities achieving journey status or accessing higher paying skilled jobs in both training options? (page 12)

DATA SOURCES

The data collected in the CRO database allows the program to be closely monitored by tracking reported training hours, gender, race and ethnicity demographics, trade descriptions, and returning apprentices. All information from the Department's contractor and training programs provide information that is collected, reported, and analyzed from the forms. All the FHWA-funded construction projects with either apprenticeship or trainee requirements in the CRO database have been used in this study. The first apprentices tracked in the system were in 1998 and trainees in 1999; the entire study contains data from January 1, 1998 to June 30, 2010.

Prior to contract award, the contractors must choose and declare which program it intends to use to fulfill the OJT requirements. If a contractor decides to develop an in-house training program, they must submit a training schedule with the Training Program guidelines (Appendix B, Form 25A-310: DOT & PF Training Program Request) for approval by the Department's OJT Coordinator. A contractor utilizing either training programs must indicate the type of training to be provided and the number of hours (Appendix B, Form 25A-311: Training Utilization Report). The contractor will select an individual and notify the OJT Coordinator of the apprentice/trainee information (Appendix B, Form 25A-312: Apprentice/Trainee Employment Report). Contractors on federal-aid contracts with OJT goals are required to submit apprentice forms on a monthly reporting schedule (Appendix B, Form 25A-313: Monthly Training Report) once training begins.

The CRO classifies race/ethnicities as Alaska Native, American Indian, Asian Indian, Asian Pacific, Black American, Caucasian, and Hispanic. The Alaska Department of Labor & Workforce Development (DOLWD) provides population statistics representing African American, Asian & Pacific, Caucasian, Native American, and Hispanic.

For comparative purposes, the CRO has grouped Asian Indian and Asian Pacific together to align with the DOLWD Asian & Pacific demographic category. Also, the American Indian and Alaska Native groups have been combined to align with the USDOL/OA and the DOLWD American Indian & Alaska Native category. There have been no male Caucasian apprentices or trainees included in the Department's OJT Program; therefore, all persons identified as "Caucasian" of the Department's data are female.

The USDOL/OA provided the demographics of construction-related occupations for the FY2008-2010 enrollees in apprenticeships programs. Classifications in the USDOL database system include Hispanic, American Indian & Alaska Native, Asian, Black, Hawaiian, White, and Race/Ethnicity unknown. Again, for comparative purposes, Asian and Hawaiian are merged to the combined DOLWD Asian & Pacific demographic category.

Apprentices and trainees hired on projects may have returned to work in Alaska as a journeyworker or in the construction industry. With assistance from the USDOL/OA and DOLWD, information regarding the apprentices/trainees was attainable. Examples of information provided by the departments include the apprenticeship program dates of completion, dates of apprenticeship removal, current employment fields, and last known mailing address or point of contact for updated information for survey contacts.

WHAT THE NUMBERS ARE TELLING US

The CRO, in cooperation with the Department's Regional Compliance Officers, tracks the fulfillment of the OJT training program hours required per contract. Prior to a bid opening on a FHWA-funded construction project, mandatory minimum hours and positions are set by the OJT Support Services Coordinator. The Training Program requires a minimum 500 hours of on-the-job training hours and the Apprentice Program contains calculations that equate to 480 hours per apprentice. These are the baseline numbers that show whether a contractor is successful in fulfilling the training component of the contract (Table 2, Column A).

The following table highlights the frequency of contractors' selection of apprentices versus trainees. In twelve years, 204 projects have been reported with an OJT requirement. Apprentices are overwhelmingly preferred and utilized by contractors. Only 19 out of 204 projects with the 645 Training Requirements have requested the Training Program. Approximately 90.7% of the FHWA OJT projects requested apprentices from the USDOL Apprenticeship Program and account for 94.9% of reported training hours. Based upon the percentages, it is clear that contractors provide more training opportunities for apprentices.

	Section 645 Training Program Option	A	B	C	D	E	F	G	H
		Required Hours per Position	# Of Positions Reported	# of People Reported	Total Hours Reported	No. of Projects w/ OJT	No. of Contractors	Avg. (mean) Hours per Person	Avg. (mean) Hours per Position
1	Apprentice	480	444	290	213,033.25	185	51	734.60	479.80
2	Trainee	500	23	23	11,438.25	19	16	497.32	497.32
	Total		**467**	**313**	**224,471.50**	**204**	**61***	**717.16**	**480.67**

Table 2: OJT §645 Training Program Utilization Comparisons (Source: Alaska Department of Transportation & Public Facilities [ADOT&PF], Civil Rights Office [CRO] Database)

*some contractors have selected both the USDOL Apprentice Program and Department's Training Program, historically.

Column G depicts the average number of hours per apprentice, not position. There are apprentices who appear in the Department's Apprentice Program repeatedly over a course of a few years, as well as those who never appear again due to either termination by the contractor or quitting by the apprentice. On the one hand, the 444 apprentice positions were fulfilled by 290 individuals, indicating continuity of employment. On the other hand, the 23 trainee positions were fulfilled by 23 individuals, indicating short-term employment.

In initial project stages, required OJT hours are, at best, estimated. Most contractors complete the requirements, but exceptions are made depending work load, project completion, or early shut-down due to the seasonal dependency on Alaskan weather (Column H). Apprenticeship programs report in 0.04% below the required total, versus the 0.54% reported for training programs. This is an acceptable rate for both programs.

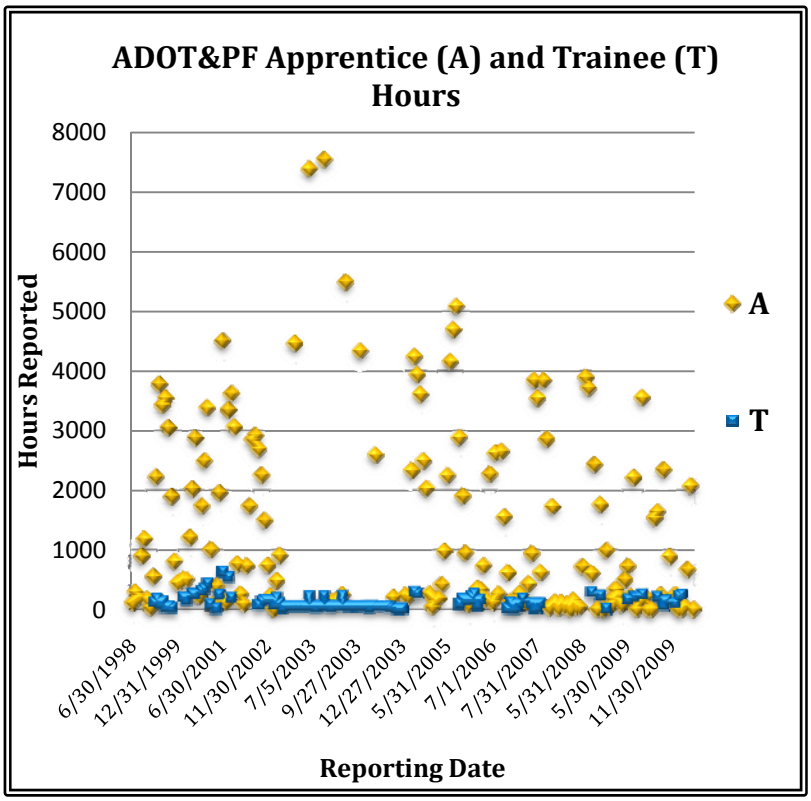


Figure 1: OJT §645 Training Program Utilization and Reported Hours (Source: ADOT&PF, CRO Database)

Utilization of apprentices and trainees are shown at the peaks of construction seasons (May through October) in Figure 1. The seasonal trend of the trainee hours may be attributed to the type of projects contractors have selected for the Training Program option. Trainees have mainly been selected for ferry vessel and terminal refurbishments in Southeast Alaska or Washington. The reported 2003 trainee hours in Figure 1 is attributed to two projects: the Metlakatla Ferry Vessel and Alaska Highway MP 1268 Slide Repair.

Ferry terminal and vessel projects use trainees more frequently. Six out of the 23 trainees were on federal-highway terminal or ferry vehicle projects; 8 out of the 271 apprentices were on the same type of projects. The frequency of trainees is rare; one trainee worked on a project in 2010.

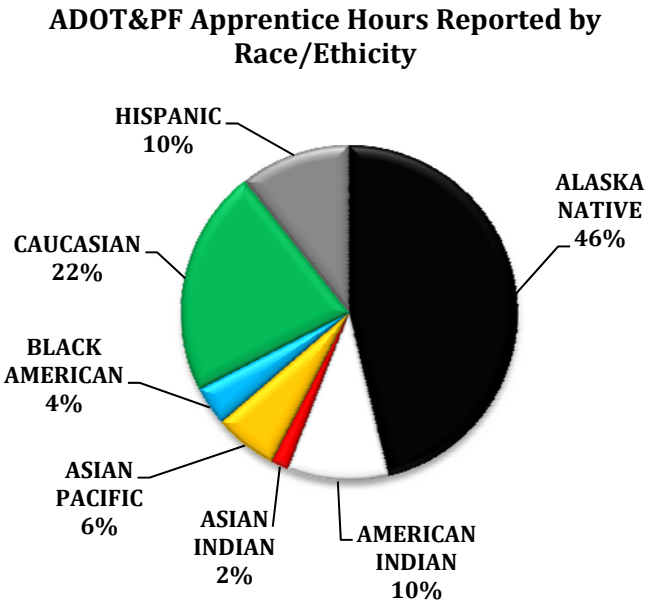
OBJECTIVE: IMPROVING THE SKILLS OF WOMEN & MINORITIES

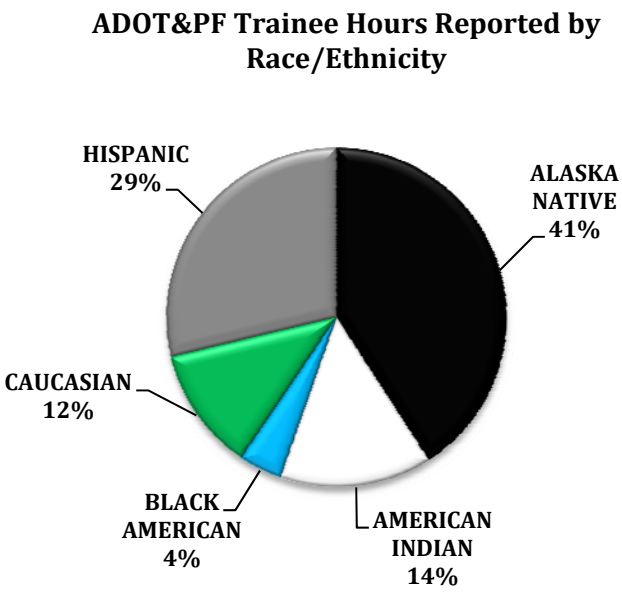
Does the Department's training options improve the skills of women and minorities? Demographic information of the apprentices and trainees is provided to the CRO on the Apprentice/Trainee Employment Report (Appendix B, Form 25A-313). This employment report is the tool that captures demographics, hours, job classifications, and hours to evaluate meeting the objective of training men and minorities in the §645 Training Program.

There is a strong contrast between computed hours of trainees and apprentices. Female apprentices completed 80,181.75 more hours than the reported 3,542.75 hours for female trainees. Female apprentice hours equate to 39% of overall reported apprenticeship hours. Female trainee hours make up 31% of overall trainee hours.

Female employment data are shown to be successfully comparable in each training program. The contractor may train non-minority males in compliance with §645, but only if documentation of good faith efforts has been submitted to and approved by the Department prior to the employment of such non-minority male(s) (Appendix B, Form 25A-311). However, there has not existed a non-minority apprentice/trainee male during the study's reporting period.

The reporting requirements also provide the CRO with the race/ethnicity breakdown for hours reported (Figures 2 and 3, next page).





Figures 2 and 3: Demographics of the OJT §645 Training Programs Reported Hours (Source: ADOT&PF, CRO Database)

The Caucasian demographic statistics only include females in the Department's OJT Program. Figures 2 and 3 show the apprenticeship program has reported a more diverse pool of hours by race/ethnicity.

In addition to percentage comparisons, the actual reported data of hours shows the significant range of the two programs:

	ADOT & PF Apprenticeship (A) Hours	ADOT & PF Trainee (T) Hours
FEMALE		
ALASKA NATIVE	30,709.75	539.00
AMERICAN INDIAN	3,881.25	640.75
BLACK AMERICAN	1,253.00	0.00
CAUCASIAN	46,617.25	1,347.50
HISPANIC	1,263.25	1,015.50
FEMALE TOTAL	**83,724.50**	**3,542.75**
MALE		
ALASKA NATIVE	67,719.75	4,140.75
AMERICAN INDIAN	16,860.75	1,010.50
ASIAN INDIAN	3,544.50	0.00
ASIAN PACIFIC	12,993.50	0.00
BLACK AMERICAN	6,765.50	469.50
HISPANIC	21,424.75	2,274.75
MALE TOTAL	**129,308.75**	**7,895.50**
GRAND TOTAL	**213,033.25**	**11,438.25**

Table 3: Actual OJT §645 Training Hours Reported 1998-2010 (Source: ADOT&PF, CRO Database)

Overall, the §645 Training Program is shown to be quite diverse by training women and minorities. The apprenticeship component does train a more diverse pool by a significant amount of hours. However, the program data are only a subset of the apprenticeship program and State of Alaska residents. The Department's §645 Training Program demographics will be compared to USDOL apprenticeship demographics, as well as State of Alaska population statistics, to determine if the program is broadening the labor pool.

OBJECTIVE: BROADENING THE LABOR POOL

Have our §645 Training Program options broadened the labor pool to meet the projected future labor needs in the construction industry? The answer can be summarized into two components: demographics and workforce/trades. The CRO data will now be compared to the State of Alaska population ages 20-40, the 2010 Federal-Aid Highway Construction Summary of Employment Data (Form FHWA-1392), and the USDOL/OA Construction Apprentices (FY2008-FY2010).

The USDOL Office of Apprenticeship provided FY2008-2010 demographics for registered apprentices. The construction classifications included in the USDOL data were Operating Engineer, Piledriver, Carpenter, Electrician, Maintenance Mechanic, Construction Craft Laborer, Construction Truck Driver, Heavy Truck Driver, Surveyor Assistant, Painter, Asphalt Paving Machine Operator, Welder, and Structural Steel/Ironworker.

The CRO data was compared to the DOLWD Alaska Population Overview: 2009 Estimates, Alaska Population by Age, Race Alone or in Combination, Ethnicity and Sex, July 1, 2009, MARS with Imputation Adjustment (Williams, 2010). The following percentages are reflective of each data set, not the entire State of Alaska population. That is, 39% of ADOT&PF apprentices are female-not 39% of Alaska's female population are ADOT&PF apprentices.

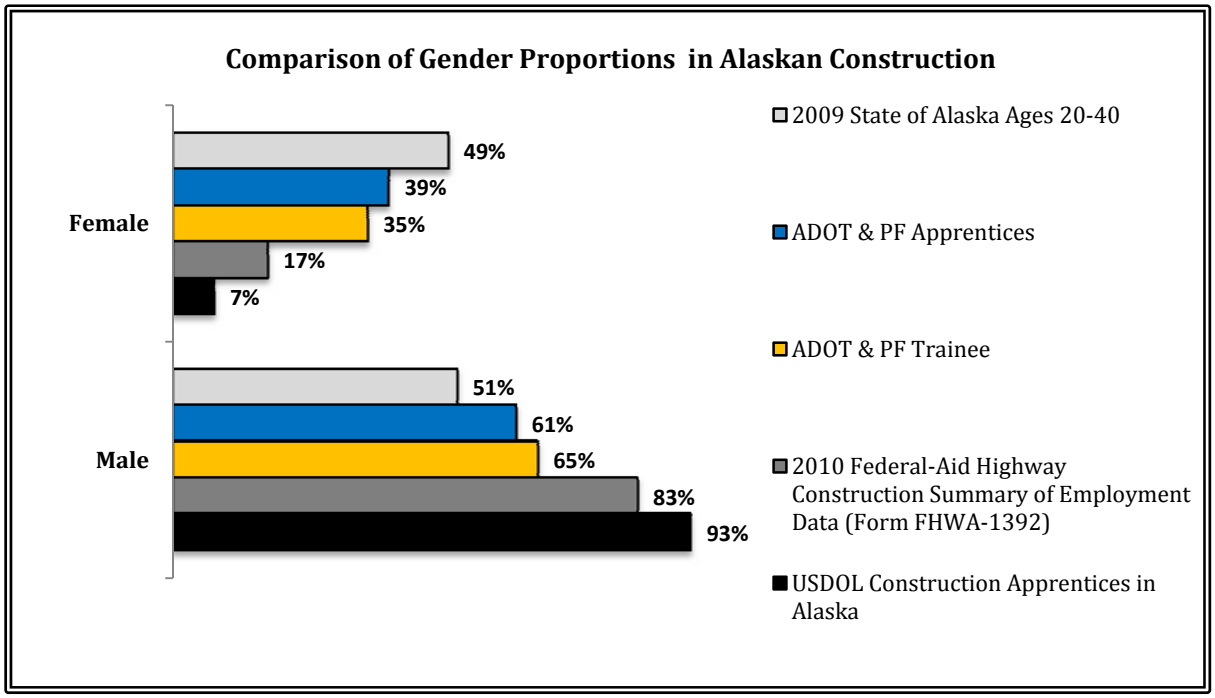


Figure 4: Alaska Gender Demographics by Percentage (Source: ADOT&PF, CRO Database, USDOL, DOLWD)

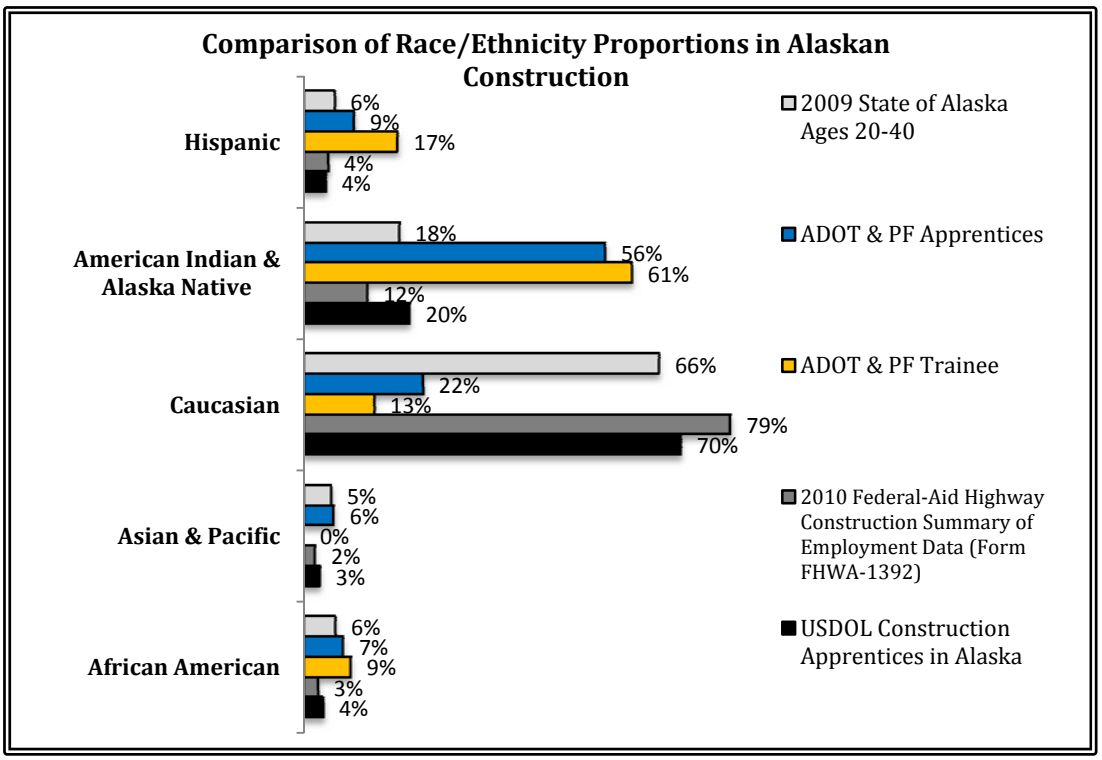


Figure 5: Demographic Comparison by Percentage (Source: ADOT&PF, CRO Database, USDOL, DOLWD)

The most current Federal-Aid Highway Construction Data (Form FHWA-1392) captures the 2010 peak construction workforce reported throughout Alaska in July, as required under the same federal EEO provisions of 23 CFR 230 (Equal Employment Opportunity on Federal and Federal-Aid Construction Contracts). This data is also collected by the Civil Rights Office.

In Figure 4, the Department's female apprentice proportion of enrollees is closest to the 2009 female State of Alaska residents ages 20-40. Second, the training program comes in at 35%, which is different than the percentage of female trainee *hours* reported as 31%. It is shown that the Department's apprentices under the §645 Training Program are diversifying the labor pool by offering increased opportunities on the job.

In Figure 5, the CRO on-the-job training data only reports *female* Caucasian enrollees and does not track or contain male Caucasians in the database. The two relationships between the Department's apprentices and the USDOL Construction Apprentices in Alaska, and the Department's apprentices to the Federal-Aid Highway Construction Data, are the most applicable in assessing the demographics of today's workforce. The smaller percentage of minorities registered in USDOL construction trades highlights the assignments that the Department utilizes out of the pool of apprenticeships. The higher percentages of the Department's apprentices compared to the 2010 Federal-Aid Highway Construction Data show that the Department is indeed helping train minorities in the workforce. But what trades have apprentices been working towards and are they aiding the demand of the industry?

The construction trades in the Department's apprenticeship program are primarily Operator Engineers and Laborers. The majority of the projects have been pavement rehabilitation,

repaving, or resurfacing projects, with only a handful of bridge and pedestrian pathway improvement projects.

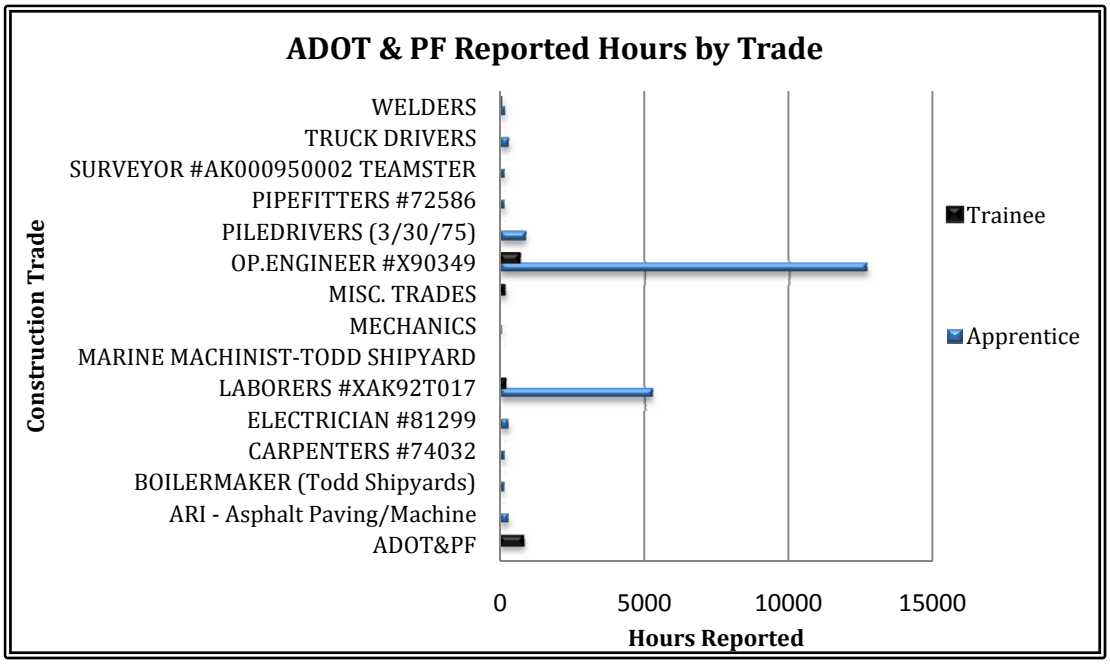


Figure 6: OJT §645 Training Programs Reported Trades (Source: ADOT&PF, CRO Database)

Although the trades are not evenly dispersed amongst the options, the 2010 Federal-Aid Highway Construction Data (Form FHWA-1392) shows similar trends that show operator engineers, truck drivers, and laborers, to be working on highway projects:

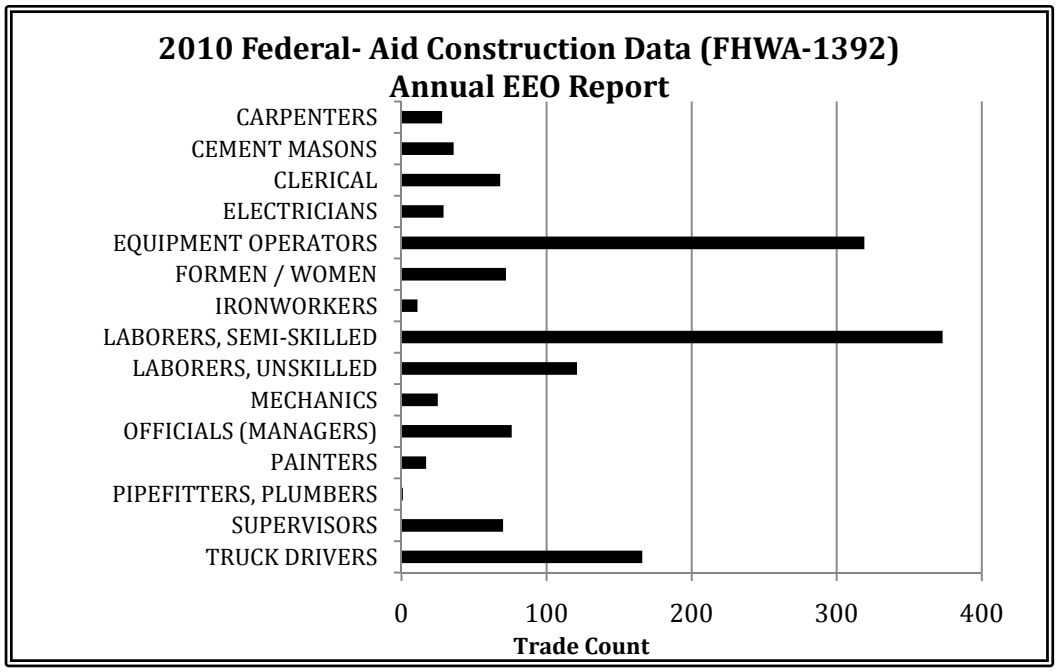


Figure 7: 2010 Federal-Aid Highway Construction Summary of Employment Data (Form FHWA-1392) (Source: ADOT&PF, CRO)

This data indicate that carpenters, cement masons, electricians, and ironworkers do have a demand on FHWA projects and the Civil Rights Office should work with prime contractors to diversify the trades in assigning apprentices/trainees.

One of the major initiatives of the State of Alaska is the Alaska Gasline Inducement Act (AGIA). The DOLWD time has forecasted the construction-related demands of the project:

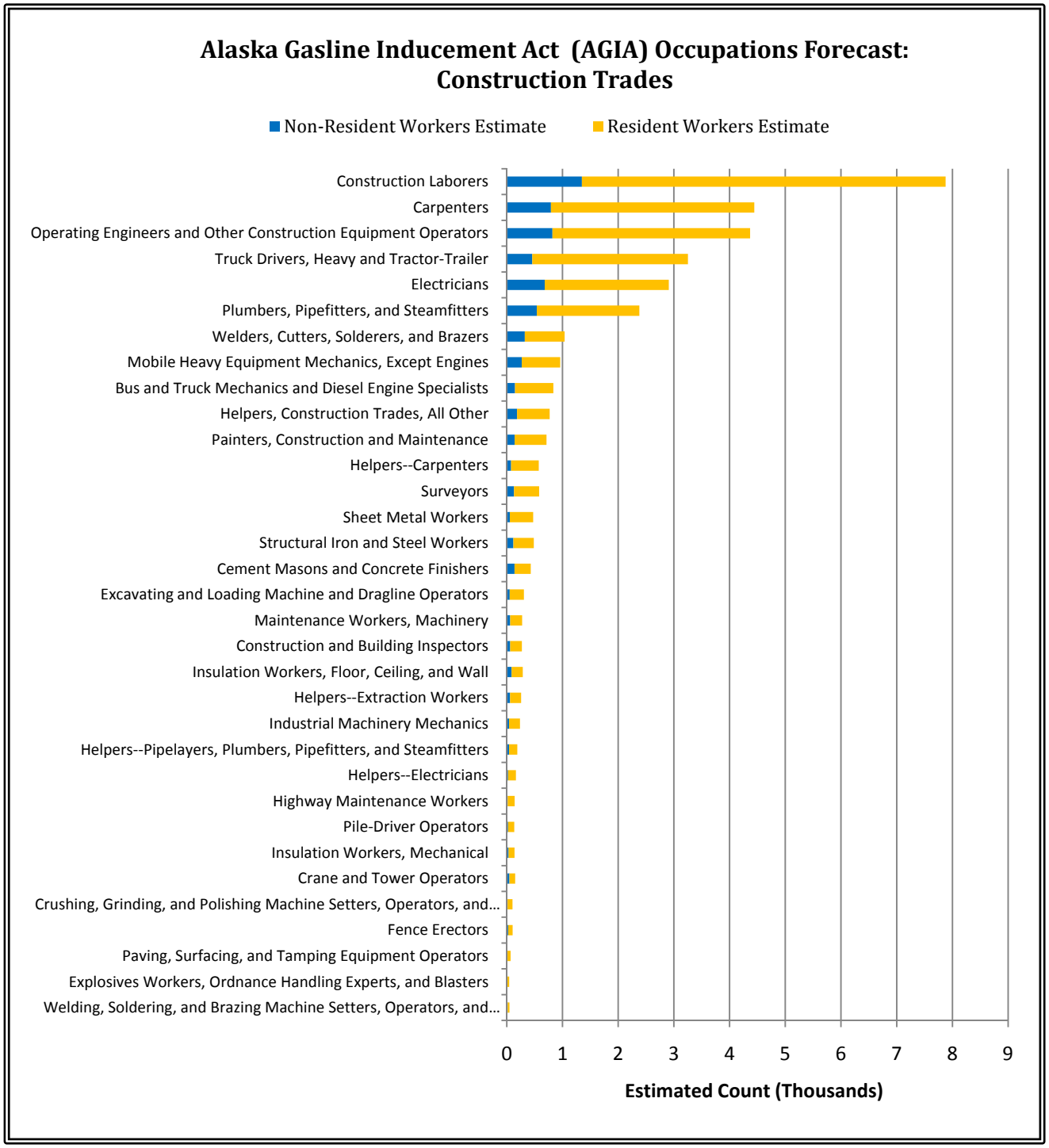


Figure 8: Estimated Construction-Related Trades of AGIA Workforce (Data source: DOLWD)

Of the listed occupations provided by the DOLWD, the highway-construction related fields are graphically shown as construction laborers, carpenters, operating engineers, truck drivers, electricians, plumbers and pipefitters, welders, and mechanics (Figure 8). As we have revealed, the Department's apprentices are routinely put to work in the operator engineer and laborer trades. However, the Department's trainee data do not show sufficient support of the State of Alaska construction trades today, or in the future.

The electrical trade is applicable on federal highway projects, but the demand of electrical worker training could best be placed on FAA-funded projects in Alaska to help this demand. The Department expends nearly $170M on airport construction, relocation, and renovations to any of the 256 of 280 the State of Alaska owns. Placing a comparable on-the-job training program under aviation projects has been a consideration of the Civil Rights Office since 2001, but FAA approval for a training provision must occur.

OBJECTIVE: WOMEN & MINORITIES ACHIEVING JOURNEY STATUS

Are those women and minorities achieving journey status or accessing higher paying skilled jobs in both §645 Training Program options? The most crucial measurement of training success does not favor the Department's Trainee Program.

The DOLWD assisted in the initial tracking of the trainees. The information contained employment and wage information for the private sector, state, and local government wage and salary workers in Alaska. Federal government workers, military, and the self-employed were not included in the information.

The USDOL/OA was able to trace 179 apprentices out of the 290 apprentices the CRO approved on highway projects. Of the 179, 34% of the Department's apprentices cancelled their apprenticeship, 66% completed it and moved on to journeyworker status. The remaining 111 apprentices were not found as registered in the USDOL/OA database system.

In 2010, six out of the 23 trainees were traced to the following fields by the USDOL/OA, one in each:

- water treatment
- health care
- social services
- retail sales
- stock clerk
- construction laborer.

The remaining 17 trainees were assumed to be working outside the State of Alaska, unemployed, or not able to track. Two of the 23 trainees registered in Laborer and Operator Engineer apprenticeship programs, but both cancelled their apprenticeship.

In total, 1 of 23 trainees was working as a construction laborer in 2010, which equates to 4.3% of trainees who had enrolled in the Training Program. The one construction worker could not be contacted for a survey interview.

Once the employee completes the training with the contractor, they must receive journeyworker wages with that contractor (Appendix A, Statewide Special Provision 645 Training Program). So far, this has not appeared to be the case. No trainee has received journeyworker status.

SUMMARY

In order to meet federal regulations and to ensure that the Department has a construction workplace free of discrimination, every career path for women and minorities must be effective. The success of individuals participating in this program is important; this training program is the main career path for women and minorities into the construction workforce. The Department's training programs meet the federal and Department directives to grant training access to women and minorities, as depicted in CRO enrollment data. However, the Department's Trainee Program fails both objectives to

I. provide training and improve the skills of women , minorities, and disadvantaged persons so that they have the opportunity to access higher paying skilled trade jobs and achieve journeyworker status, and

II. broaden the labor pool to meet the projected future labor needs in the construction industry

The Trainee Program is not fulfilling the objective to yield journey workers; furthermore, trainee employment at journeyworker status beyond minimum hours has not shown to be comparable to apprentices participating in a registered apprenticeship program. The Trainee Program is not shown to adequately fulfill present and projected labor needs in Alaska's construction industry.

The current method of approving a short-term training program developed by a contractor seeking a contract award does not ensure long-term employability, journeyworker achievement, or skill development beyond the time period of the construction contract. Of the information shown in this study, the following points summarize the findings:

- **The Department's contractors prefer apprentices.** Approximately 90.7% of the FHWA OJT projects requested apprentices from the USDOL Apprentice Program and account for 94.9% of reported training hours to fulfill the §645 Training Program requirements.

- **Female apprentices complete more hours.** Female apprentice hours report 80,181.75 more hours than the reported 3,542.75 hours for female trainees.

- **Apprentices are employable**. The 444 positions reported under an apprenticeship program were fulfilled by 290 individuals, whereas, each trainee only appears once in the program. More training opportunities have been provided to women and minorities in a registered apprenticeship program.

- **Apprentices make journeyworker status**. Sixty-six percent of the apprentices completed the apprenticeship program and moved on to journeyworker status. Only one of the 23 trainees is working in the construction field, and journey status is unknown.

RECOMMENDATIONS

1. **The study shows the Department's Section 645 Training Special Provisions under USDOT 23 CFR 230.111(a) needs to be amended**.

2. **The Department should adopt Special Training Provisions that closely models a registered apprenticeship program or outright require a USDOL registered apprenticeship program to fulfill the training required under 23 CFR 230.111.**

CONTACT US

ADOT&PF Civil Rights Office
2200 E. 42nd Avenue
PO Box 196900
Anchorage AK 99519-6900
907-269-0851
1-800-770-6236 inside Alaska
907-269-0847 fax
www.dotcivilrights.alaska.gov

For individuals requiring TTY communications, please contact Alaska Relay.
Feel free to contact via email any of the individuals listed below.

Author, Krystalynn Scott, Statistical Technician II Krystalynn
Maintains the Civil Rights Office database and works with contractors and Federal Highway Administration and Federal Aviation Administration on numerous aspects of reporting.

Norma Lucero, OJT Support Services Coordinator Norma
Administers the DBE and OJT Support Services programs, working with contractors bidding on Alaska Department of Transportation and Public Facilities projects.

Winnie Cichosz, Support Services Assistant Winnie
Assists businesses with DBE and OJT Support Services.

Jon Dunham, Civil Rights Office Manager Jon
Responsible for overall Civil Rights Programs implementation and reporting to Federal Highway Administration, Federal Aviation Administration, and Federal Transit Administration for Alaska Department of Transportation and Public Facilities.

ABBREVIATIONS & DEFINITIONS

§645	State of Alaska Department of Transportation & Public Facilities Statewide Special Provisions Section 645 implements 23 CFR 230 Subpart A (See Appendix A)
Apprentice	*Apprentice shall mean a worker at least 16 years of age, except where a higher minimum age standard is otherwise fixed by law, who is employed to learn a skilled trade as defined in 29.4 under standards of apprenticeship fulfilling the requirements of 29.5* – 29 CFR Part 29.2 (e) Apprenticeship Programs, Labor Standards for Registration, Amendment of Regulations; Final Rule
ADOT&PF	Alaska Department of Transportation & Public Facilities
BAT	Bureau of Apprenticeship and Training
CRO	Civil Rights Office
DOLWD	Alaska Department of Labor and Workforce Development
OJT	On-the-Job training
Trainee	A person employed and individually selected by a prime contractor to fulfill the required Alaska Department of Transportation & Public Facilities Training Program under §645 Training Program
USDOL	United States Department of Labor
USDOL/OA	United States Department of Labor, Office of Apprenticeship
USDOT	United States Department of Transportation

REFERENCES

Alaska Department of Labor and Workforce Development (DOLWD) AGIA Forecast [Data File], December 2010.

Alaska Department of Transportation & Public Facilities, Civil Rights Office website (2010), www.dotcivilrights.alaska.gov

Alaska Department of Transportation & Public Facilities, Statewide Special Provisions 645 http://www.dot.state.ak.us/cvlrts/forms/sec-645.pdf

Office of Federal Register. 23 CFR 230. Retrieved 2010 from Electronic Code of Federal Regulations (e-CFR) via GPO Access: http://ecfr.gpoaccess.gov/cgi/t/text/textidx?c=ecfr&rgn=div5&view=text&node=23:1.0.1.3.8&idno=23#23:1.0.1.3.8.1

Williams, J. (2010). *Alaska population overview: 2009 estimates*. Retrieved December 2010 from http://labor.alaska.gov/trends/dec10.pdf

S 16
Add the following section:

SECTION 645

TRAINING PROGRAM

645-1.01 DESCRIPTION. This Training Special Provision implements 23 CFR 230, Subpart A, Appendix B.

As part of the Equal Employment Opportunity Affirmative Action Program, the Contractor shall provide on-the-job training aimed at developing full journey status in the type of trade or job classification involved. The number of individuals to be trained and the number of hours of training to be provided under this contract will be as shown on the bid schedule.

645-2.01 OBJECTIVE. Training and upgrading of minorities and women toward journey status is the primary objective of this program. The Contractor shall enroll minorities and/or women, where possible, and document good faith efforts prior to the hire of non-minority males in order to demonstrate compliance with this Training Special Provision. Specific good faith efforts required under this Section for the recruitment and employment of minorities and women are found in the Federal EEO Bid Conditions, Form 25A-301, items 7.b, 7.c, 7.d, 7.e, 7.i, 7.j and 7.l, located in the "green pages" of this document.

645-3.01 GENERAL. The Contractor shall determine the distribution of the required number of apprentices/trainees and the required number of hours of training among the various work classifications based upon the type of work to be performed, the size of the workforce in each trade or job classification, and the shortage of minority and female journey workers within a reasonable area of recruitment.

Training will be provided in the skilled construction crafts unless the Contractor can establish prior to contract award that training in the skilled classifications is not possible on a project; if so, the Department may then approve training either in lower level management positions such as office engineers, estimators, and timekeepers, where the training is oriented toward construction applications, or in the unskilled classifications, provided that significant and meaningful training can be provided. Some offsite training is permissible as long as the training is an integral part of an approved training program and does not comprise a significant part of the overall training.

Credit for offsite training hours indicated above may only be made to the Contractor where the apprentices/trainees are concurrently employed on the project and the Contractor does one or more of the following: contributes to the cost of the training, provides the instruction to the apprentice/trainee, or pays the apprentice's/trainee's wages during the offsite training period.

Where feasible, 25 percent of apprentices or trainees in each occupation shall be in their first year of apprenticeship or training.

Prior to award of the contract, the Contractor shall submit Form 25A-311, Training Utilization Report, indicating the training program to be used, the number of apprentices/trainees to be trained in each selected classification, the number of hours of training to be provided, and the anticipated starting time for training in each of the classifications.

Training must begin within 2 weeks of the anticipated start date(s); unless otherwise authorized by a Directive. Such authorization will be made only after submission of documentation by the Contractor, and approval by the Engineer, of efforts made in good faith which substantiate the necessity for a change.

Contractors may use a training program approved by the U.S. Department of Labor, Bureau of Apprenticeship & Training (USDOL/BAT), or one developed by the Contractor and approved prior to contract award by the Alaska

Department of Transportation and Public facilities (ADOT&PF) Training Program Representative, using Form 25A-310.

The minimum length and type of training for each classification will be established in the training program selected by the Contractor. Training program approval by the Department for use under this section is on a project by project basis.

It is expected that each apprentice/trainee will begin training on the project as soon as feasible after start of work utilizing the skill involved and remain on the project as long as training opportunities exist or until training has been completed. It is not required that apprentices/trainees be continuously employed for the duration of the contract.

If, in the judgment of the Contractor, an apprentice/trainee becomes proficient enough to qualify as a journey worker before the end of the prescribed training period and the Contractor employs that individual as a journey worker in that classification for as long as work in that area remains, the individual's training program will be considered completed and the balance of training hours required for that apprentice/trainee shall be waived.

The Contractor shall furnish each ADOT&PF training program trainee a copy of the program (Form 25A-310) to be followed during training on the project, and with a written certification showing the type and length of training completed on the project. Existing USDOL/BAT apprentices should already have a copy of their program. No employee shall be employed for credit as an apprentice/trainee in a classification in which that employee has previously worked at journey status or has previously completed a training course leading to journey status.

The Contractor shall periodically review the training and promotion potential of minority and women employees and shall encourage eligible employees to apply for such training and promotion.

The Contractor shall provide for the maintenance of records and the furnishing of periodic reports documenting the progress of each apprentice/trainee. The Contractor must submit Form 25A-313 by the 15th of each month and provide each ADOT&PF trainee written evaluation reports for each unit of training provided as established on Form 25A-310.

645-3.02 WAGES. Trainees in ADOT&PF approved training programs will be paid prevailing Davis-Bacon fringe benefits plus at least 60 (but less than 100) percent of the appropriate minimum journey rate specified in the contract for the first half of the training period, at least 75 (but less than 100) percent for the third quarter of the training period, and at least 90 (but less than 100) percent for the last quarter of the training period. Trainee wages shall be identified on Form 25A-310. Apprentices in USDOL/BAT training programs shall be paid in accordance with their approved program. Beginning wages of each trainee/apprentice enrolled in a Section 645 Training Program on the project shall be identified on Form 25A-312.

645-3.03 SUBCONTRACTS. In the event the Contractor subcontracts a portion of the work, he shall determine how many, if any, of the apprentices/trainees are to be trained by the subcontractor. Any such subcontracts shall include this Section 645, Form 25A-311 and Form 25A-310, where appropriate. However, the responsibility for meeting these training requirements remains with the Contractor; compliance or non-compliance with these provisions rests with the Contractor and sanctions and/or damages, if any, shall be applied to the Contractor in accordance with subsection 645-5.01, Basis of Payment.

645-4.01 METHOD OF MEASUREMENT. The Contractor will be credited for each approved apprentice/trainee employed on the project and reimbursed on the basis of hours worked, as listed in the certified payrolls. There shall be no credit for training provided under this section prior to the Contractor's submittal and approval by the Engineer of Form 25A-312 for each apprentice/trainee trained under this Section. Upon completion of each individual training program, no further measurement for payment shall be made.

645-5.01 BASIS OF PAYMENT. Payment will be made at the contract unit price for each hour of training credited. Where a trainee or apprentice, at the discretion of the Contractor, graduates early and is employed as a journey worker in accordance with the provisions of subsection 645-3.01, the Contractor will receive payment only for those hours of training actually provided.

This payment will be made regardless of any other training program funds the Contractor may receive, unless such other funding sources specifically prohibit the Contractor from receiving other reimbursement.
Payment for training in excess of the number of hours specified on the approved Form 25A-311, may be made only when approved by the Engineer through Change Order.

Non-compliance with these specifications shall result in the withholding of progress payments until good faith efforts documentation has been submitted and acceptable remedial action has been taken.

Payment will be at the end of the project following the completion of all training programs approved for the project. No payment or partial payment will be made to the Contractor if he fails to do any of the following and where such failure indicates a lack of good faith in meeting these requirements:

1. provide the required hours of training (as shown on the approved Form 25A-311),

2. train the required number of trainees/apprentices in each training program (as shown on the approved Form 25A-311), or

3. hire the apprentice/trainee as a journey worker in that classification upon completion of the training program for as long as work in that area remains.

Failure to provide the required training damages the effectiveness and integrity of this affirmative action program and thwarts the Department's federal mandate to bring women and minorities into the construction industry. Although precise damages to the program are impractical to calculate, they are at a minimum, equivalent to the loss to the individuals who were the intended beneficiaries of the program. Therefore, where the Contractor has failed, by the end of the project, to provide the required number of hours of training and has failed to submit acceptable good faith efforts documentation which establishes why he was unable to do so, the Contractor will be assessed an amount equal to the following damages to be deducted from the final progress payment:
Number of hours of training not provided, times the journey worker hourly scale plus benefits. The journey worker scale is that for the classification identified in the approved programs.

Payment will be made under:

Pay Item	Pay Unit
645(1) Training Program, ___ Trainees/Apprentices	Labor Hour

APPENDIX B: ADOT & PF CIVIL RIGHTS OFFICE FORMS

FORM 25A-310(PAGE 1)

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

DOT&PF TRAINING PROGRAM REQUEST

Federal-Aid Contracts

_____

Project Name and Number

Section 645, entitled "Training Program" in the Special Provisions, specifies the number of minorities and/or women to be trained and the number of hours of training to be provided under the terms of this contract. Contractors desiring to use DOT&PF approved training programs (instead of those approved by USDOL/BAT) shall complete items 1 through 5; use additional sheets, if necessary, and reference appropriately. Training shall be in the skilled construction trades, where possible. One form shall be completed for each job classification selected. Contractors are encouraged to contact the DOT&PF Civil Rights Office* for assistance with developing approvable training programs prior to bid opening; training programs must be approved prior to award of the contract. Training programs which are less than 500 hours will not be approved.

1. **Job Classification:** _____

2. **Minimum qualifications** for trainee(s) shall be as follows: (minimum starting age, prerequisite education and/or experience):

_____
_____
_____
_____

3. **Training Schedule.** This schedule must contain not less than 500 hours of training. Allocation of time to be spent in each unit of training (3A, 3B, 3C, and 3D) shall be specific and consistent with industry practice.

A. ORIENTATION AND OBSERVATION (introductory unit to include construction basics, traffic flow, basic skills, crafts involved on project, etc.)

(1) Safety Procedures (detail routine activities, safety meetings, etc.): _____ HOURS

_____
_____
_____
_____

(2) Observation of Basic Skills (list specific skills): _____ HOURS

_____
_____
_____
_____

(3) Manipulation of Tools or Equipment (list tools, equipment, and activities): _____ HOURS

_____
_____
_____
_____

SUBTOTAL A: _____ **HOURS**

* DOT&PF Civil Rights Office: (907) 269-0851 or toll free: 1-800-770-6236

Form 25A-310 (8/01) Page 1 of 3

FORM 25A-310(PAGE 2)

B. CARE AND MAINTENANCE OR SPECIAL PREPARATIONS (list of basic skills and activities which prepare the trainee(s) for maintenance and care of tools/equipment required in this job classification)

(1) Safety (required; specify hazards and checks): _____ HOURS

(2) Maintenance schedule and care of tools/equipment (list responsibilities of trainee): _____ HOURS

(3) Basic skills involved: _____ HOURS

SUBTOTAL B: _____ **HOURS**

C. APPLIED TECHNIQUES AND/OR METHODS (include manipulation of tools/equipment, patterns or processes involved, coordination with other equipment and/or crafts, etc.)

(1) Safety (required; specific activities, meetings, quality control, etc): _____ HOURS

(2) Identify equipment/tools involved in each process: _____ HOURS

(3) Particular methods or patterns involved: _____ HOURS

SUBTOTAL C: _____ **HOURS**

D. ACTUAL APPLICATION OR OPERATION (specify the activities and the general order in which they will be taught/practiced where the trainee applies the knowledge learned in Items 3A, 3B, and 3C)

(1) Safety (required; list specific and routine activities): _____ HOURS

(2) Identify general workday routine and operational activities: _____ HOURS

(3) Special activities and/or coordination efforts: _____ HOURS

SUBTOTAL D: _____ **HOURS**

Form 25A-310 (8/01) Page 2 of 3

FORM 25A-310(PAGE 3)

E. RELATED OFF-SITE INSTRUCTION. (Optional) In order to receive credit for off-site instruction, the trainee must be concurrently employed on the project and the Contractor must either provide the instruction, pay for the instruction, or pay the trainee's wages while attending the off-site instruction.

Describe offsite instruction in detail:

_____

_____

_____

_____

_____

_____ **SUBTOTAL E:** _____ **HOURS**

_____

Name and Address of Provider

4. **Total Hours.** Total of training hours provided in Items 3A-E: **TOTAL:** _____ **HOURS**

5. **Wages.** Trainees shall be paid prevailing Davis-Bacon fringes, plus the following during their training: (see Section 645 wage requirements)

1st half: $ _____ = _____ % of journey scale

3rd quarter: $ _____ = _____ % of journey scale

4th quarter: $ _____ = _____ % of journey scale

6. **Evaluation.** Evaluation or grading of each trainee's performance on the job will be documented using the following procedures:

A. Each trainee will be reviewed upon completion of each unit (3A, 3B, 3C, 3D) of training; the review shall be in writing and indicate the number of hours of training received; the trainee shall participate in the review, sign it, and receive a copy.

B. The evaluation need only indicate pass/fail status. If fail status is indicated, the Contractor will provide written documentation as part of the review which documents the grounds for failure.

This training program has been developed for, and approval is hereby requested for use on, the above referenced project.

Signature of Authorized Company Representative	**Title**
Company Name	**Company Address (Street or PO Box, City, State, Zip)**
Date	( ) **Phone Number**

Approved [ ] **Disapproved [ ]**

Remarks: _____

_____

_____

_____

_____ **Training Program No. Assigned**

_____ **DOT&PF Statewide Training Representative**

_____ **Date**

Form 25A-310 (8/01) Page 3 of 3

FORM 25A-311 (PAGE 1)

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

TRAINING UTILIZATION REPORT

Federal-Aid Highway Contracts

Project Name and Number

Training Program Special Provision, Section 645 specifies the number of minorities and/or women to be trained and the number of hours of training to be provided under this Contract. The Contractor may train non-minority males in compliance with Section 645, but only if documentation of good faith efforts has been submitted to, and approved by, the Engineer, prior to the employment of such non-minority male(s). Good faith efforts, at a minimum, must be as extensive as the recruitment efforts listed in the EEO Bid Conditions, 7b, 7c, 7d, 7e, 7i, 7j, and 7l (25A301).

The number of individuals to be trained under this Contract is _____.
The number of hours of training to be provided is _____.

This Training Special Provision implements 23 CFR 230, Subpart A, Appendix B. Contractors can use either training programs approved by the U.S. Department of Labor, Bureau of Apprenticeship & Training (USDOL/BAT) or training programs approved by ADOT&PF. The Contractor must complete this form indicating the type of training to be provided, the number of individuals to be trained in each trade or job classification, the number of hours of training to be provided [3], and the anticipated training start date.

1. **To be completed by Contractors using USDOL/BAT Training Programs**: Indicate below the number of apprentices, total number of hours, and anticipated start dates for each craft selected:

APPROVED CRAFTS, CERTIFICATION NUMBERS AND JURISDICTIONAL AREAS

STATEWIDE JURISDICTION				SOUTH OF THE 63° PARALLEL			
Craft/Cert Number	Number of Apprentices	Number of Hours	Start Date	Craft/Cert Number	Number of Apprentices	Number of Hours	Start Date
Asbestos Worker #90032				Carpenter #74032			
Bricklayer #85040 Cement Mason & Plasterer #78533				Painter #72820 Pipefitter #72586			
Electrician #81299				Plumber #83534 [1]			
Ironworker #76779				Sheetmetal Worker #74072			
Op. Engineer #X90349				Other # _____			
Roofer #X90317				**NORTH OF THE 63° PARALLEL**			
Piledriver [2] (3/30/75)				Carpenter #47990			
Camp Culinary[2] (4/25/74)				Painter #77750			
Laborer #XAK92T017				Fitter/Plumber #75055			
Other # _____				Sheetmetal #76781			
Other # _____				Other # _____ Other # _____			

[1] Juneau Jurisdictional area is #83534 and Anchorage area is #72586.
[2] U.S. DOL does not assign Certification numbers to these training programs. Only approval dates.
[3] The total number of hours of training should equal the hours of training required under Section 645.

Form 25A311 (1/03) Page 1 of 2

FORM 25A-311 (PAGE 2)

2. **To be completed by Contractors using ADOT&PF training programs**: Indicate below the type of training, number of trainees, number of hours of training (500 hours per trainee), and anticipated start dates.

Job Classification	Number of Trainees	Total Hours	Anticipated Start Date(s)

3. **To be completed by all Contractors** as part of the Contractor's EEO affirmative action program, the Contractor certifies that all training will be provided by the Contractor as stated in items 1 **OR** 2 above, in accordance with Training Program Special Provision, Section 645.

Company Name _____ **Company Address** _____

Point of Contact _____ **Phone Number** _____

Signature of Authorized Company Representative _____ **Date** _____

To be completed by the ADOT&PF OJT Coordinator prior to contract award:

Training Program(s) approved for this Project and Date Approved:

Signature of ADOT&PF OJT Coordinator _____ **Date** _____

Form 25A311 (1/03) Page 2 of 2

FORM 25A-312

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

APPRENTICE/TRAINEE EMPLOYMENT REPORT

The contractor/approved subcontractor must submit this report to the Engineer for approval each construction season on or before the date that each apprentice or trainee is hired or rehired. Section 645 Training is intended for minorities and women. If a contractor wishes to train a non-minority male for credit under Item 645, the contractor must submit documentation of good faith efforts (specified in 645 2.01) to the Engineer. There will be no payment for training hours prior to the approval of this completed report and verification of applicable good faith efforts.

Project No. (Federal/State)	Project Name	
Contractor	Employee Name	Apprentice[1] ☐ Trainee[2] ☐
Employee Social Security No.	Date of Birth	Employee Start Date (this project)
Employee's Mailing Address		
Job Classification	Wage Scale[3] _____ Percentage of Journey Scale _____%	

Employee Status: New Hire ☐ Re-hire ☐ Upgrade ☐ Transfer ☐

Gender: Female ☐ Male ☐

Ethnicity: Alaska Native ☐ American Indian ☐ African American ☐ Asian/Pacific Islander ☐ Caucasian ☐ Hispanic ☐

Has the contractor provided training to this individual before, either on this project or on some other project?
Yes ☐ No ☐
If yes, is the training to be given this individual a continuation of training on this project from last season?
Yes ☐ No ☐

Signature of Authorized Company Representative _____ Date _____

Point of Contact _____ Phone _____

Address _____

For the Engineer:
Did the apprentice/trainee start training within two (2) weeks of the start date indicated on Form 25A311

Yes ☐ No ☐ If no, a change order may be required (check with the Regional Compliance Officer).

Signature of Engineer _____ Date Approved for Credit _____

1 An apprentice is a person enrolled in a USDOL/BAT training program (union or non-union).
2 A trainee is a person enrolled in an ADOT&PF approved training program.
3 A copy of a union dispatch list must accompany this form for each union apprentice hire.

Distribution after approval by Engineer to:

Project Files
Regional Contract Compliance Office
Civil Rights Office, P. O. Box 196900, Anchorage, Alaska 99519-6900
Contractor

FORM 25A-313

STATE OF ALASKA
DEPARTMENT OF TRANSPORTATION AND PUBLIC FACILITIES

MONTHLY TRAINING REPORT

The Contractor must fill in the project (Section 645) training hours each month using the table below. The Contractor should retain the original, updating it monthly while the apprentice/trainee remains on the project. The Contractor is required to submit copies of each months updated report by the 15th of the following month to: 1) The Project Engineer, and 2) The Civil Rights Office OJT Coordinator at PO Box 196900, Anchorage, AK 99519-6900 or by fax to 907-269-0847

Project No. (Federal/State)	Project Name	
Contractor	Point of Contact	Phone
Employee Name	Social Security Number	Job Classification

Gender: Female ☐ Male ☐

Ethnicity: Alaska Native ☐ American Indian ☐ African American ☐ Asian/Pacific Islander ☐ Caucasian ☐ Hispanic ☐

Anticipated Start Date For Training (From Form 25A-311): _____

Date Employee Started On This Project: _____

Date Apprentice/Employee Employment Report Approved by the Engineer (From Form 25A-312): _____

1ST YEAR - _____

JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC

2ND YEAR - _____

JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC

3RD YEAR - _____

JAN	FEB	MAR	APR	MAY	JUNE	JULY	AUG	SEP	OCT	NOV	DEC

When the apprentice/trainee separates from this project, an explanation must be given:
☐ end of work ☐ seasonal shutdown ☐ terminated for cause ☐ quit

What was the last date worked by the apprentice/trainee on this project?

IF YOU ARE USING AN ADOT&PF 500 hour training program (provided on form 25A310) to meet the training requirements the following two questions must be answered:

1) Did the trainee complete the required 500 hour training curriculum? ☐ YES ☐ NO

2) If no, will this trainee continue the training program next season on this project? ☐ YES ☐ NO
If no, explain why not.

I certify that this form has been examined by me, and to the best of my knowledge and belief, is true, correct and complete.

_____ Signature of Contractor

_____ Date

25A-313
(REV. 1/03)