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Division of Apprenticeship Standards Official Memorandum

Date: February 14, 2025
To: All Staff, Division of Apprenticeship Standards
From: Adele Burnes, Acting Chief
Subject: Wage Guidelines for IACA Programs/Occupations - Effective February 14, 2025

In early 2022, the Department of Industrial Relations reaffirmed the Division of Apprenticeship Standards (DAS) Chief's authority under California Code of Regulations, title 8, section 208, with full support from the California Labor & Workforce Development Agency. Pursuant to this authority DAS Chief (Chief), Eric Rood, directed all apprenticeship programs and occupations outside the building and construction and firefighter trades to utilize the Employment Training Panel (ETP) New Hire Trainee Wages as guidelines for setting beginning apprentice wage rates. This directive was subsequently restated through a memo from DAS Chief Curtis Notsinne in September 2024. Acting DAS Chief Adele Burnes herein reaffirms and clarifies this guidance.

Effective February 14, 2025, DAS staff is to advise programs to consider ETP Trainee Wages¹ when discussing apprentice wage schedules with IACA programs. When considering the wages for a proposed program, the Chief will compare the proposed wage levels to the benchmarked ETP wages in effect on the date the final draft of the proposed standards are submitted to the DAS Program Planning and Review team, in addition to reviewing other criteria.

Starting apprentice wages that do not meet the ETP wages for the benchmarked year and for the county/counties where apprentice work is to be performed may be rejected by the Chief. The Chief also takes into consideration many other factors in deciding whether to approve apprentice wages, such as for programs that do not meet or exceed ETP wages in circumstances where:

- Wages are covered by a Collective Bargaining Agreement (CBA)
- All 1st period apprentices attend High School

One of the DAS Chief's key statutory mandates is to "foster, promote, and develop the welfare of the apprentice and industry, improve the working conditions of apprentices, and advance their opportunities for profitable employment." ([Lab. Code, § 3073](#).) While ETP wages are not expressly required for apprentices, staff should caution programs that apprentice wages for IACA programs are subject to the Chief's sole approval (Cal. Code Regs., tit. 8, § 208), and the Chief also has sole discretion to approve/deny IACA programs, which are not in the building and construction and firefighter trades (Lab. Code, § 3075(e); Cal. Code Regs., tit. 8, § 212.2(k)(2)).

¹ "ETP Trainee Wages" are defined as those wages specified under the heading "Standard Wages, New Hire, Minimum Wage After Retention" relevant for each county.
(<https://etp.ca.gov/program-overview/trainee-wages/>)

Pursuant to California Code of Regulations, title 8, section 208, subdivision (d), wages for all apprentices must comply with State minimum wage requirements. Current ETP wage rates and the State Minimum Wage can be found at the links below.

- *ETP Link* - <https://etp.ca.gov/program-overview/trainee-wages/>
- *State* - https://www.dir.ca.gov/dlse/minimum_wage.htm