This Attestation Memorandum documents that the Labor and Workforce Development Agency and the California Workforce Development Board completed the attached Expenditure Record on June 24, 2022, for the High Road Construction Careers and High Road Training Partnerships Programs. The Expenditure Record is consistent with the statutory requirements of Government Code Section 16428.9 to support expenditures from the Greenhouse Gas Reduction Fund.

This Attestation Memorandum and Expenditure Record will be submitted to CARB for public posting on the CARB website at: www.arb.ca.gov/caclimateinvestments. Questions on this Attestation Memorandum or Expenditure Record may be directed to Curtis Notsinneh, CWDB Chief Deputy Director, at Curtis.Notsinneh@cwdb.ca.gov.

Natalie Palugyai
Secretary, Labor and Workforce Development Agency

Curtis Notsinneh for Tim Rainey
Tim Rainey
Executive Director, California Workforce Development Board
California Workforce Development Board (CWDB) Expenditure Record for High Road Construction Careers (HRCCC) and High Road Training Partnerships (HRTP) Programs (State Operations)

**Greenhouse Gas Reduction Fund: Expenditure Record**

California Workforce Development Board  
High Road Construction Careers and High Road Training Partnerships  
(State Operations)

**Authorizing legislation:** Item 7100-111-0890 of the Budget Act of 2020, as amended by SB 74 (Chapter 6, Statutes of 2020), and Item 7120-001-3228 of the Budget Act of 2021, as amended by AB 128 (Chapter 21, Statutes of 2021) – covering two fiscal years – appropriates to the California Workforce Development Board $5M in State Operations to support existing apprenticeship and job training programs, including support for training opportunities necessary to transition the State’s workforce to a low-carbon economy.

**Element (1) A description of each expenditure proposed to be made by the administering agency pursuant to the appropriation.**

<table>
<thead>
<tr>
<th>Agency that will administer funding</th>
<th>California Workforce Development Board (CWDB).</th>
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<tbody>
<tr>
<td><strong>Amount of proposed expenditure and appropriation reference</strong></td>
<td>The total expenditure is $5M to the CWDB: $2.5M covering Fiscal Year 20/21 per item 7100-111-0890 of the Budget Act of 2020, as amended by SB 74 (Chapter 6, Statutes of 2020), and $2.5M covering Fiscal Year 21/22 per item 7120-001-3228 of the Budget Act of 2021, as amended by AB 128 (Chapter 21, Statutes of 2021).</td>
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<tr>
<td><strong>Estimated amount of expenditures for administering agency administrative costs</strong></td>
<td>The total expenditure includes $5M for State Operations over FY 20/21 &amp; 21/22. The CWDB will only expend these funds on payroll and payroll associated tasks.</td>
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</tbody>
</table>
If applicable, identify laws or regulations that govern how funds will be used

- AB 1532 (Pérez, Chapter 807, Statutes of 2012), Senate Bill (SB) 535 (de León, Chapter 830, Statutes of 2012), SB 1018 (Budget and Fiscal Review Committee, Chapter 39, Statutes of 2012), SB 862 (Budget and Fiscal Review Committee, Chapter 36, Statutes of 2014), and AB 1550 (Gomez, Chapter 369, Statutes of 2016) provide the general framework for how the auction proceeds will be administered to further the purposes of AB 32.
- California Unemployment Insurance Code, Section 14230, Subdivision (e), which specifies requirements pertaining to the curriculum and targeted participants for construction pre-apprenticeship programs in California.

Continuation of existing Expenditure Record

- This is a new Expenditure Record covering FY 20/21 & 21/22 appropriations for State Operations. State Operations is needed to support the existing local assistance program work for HRTP and HRCC projects as outlined in 2019 Expenditure Record (per Section 7120-101-3228 of the Budget Act of 2019 (Chapter 23, Statutes of 2019)).
**Project type(s)**

- Workforce development
- Regional planning (to support economic diversification and transition to a carbon-neutral economy)
- Technical assistance

**Describe the projects and/or measures that will be eligible for funding**

- CWDB will use operation funds to support the existing local assistance program work for HRTP and HRCC projects as outlined in 2019 Expenditure Record (per Section 7120-101-3228 of the Budget Act of 2019 (Chapter 23, Statutes of 2019)).

**Intended recipients**

Existing awarded agencies include:

- Industry-based training providers
- Labor organizations and labor-management partnerships
- Community-based organizations
- Public education entities and training providers
- Workforce intermediaries
- Local workforce development boards
- Building & Construction Trades Councils
- Joint Apprenticeship & Training Committees
Program structure and process for selecting projects for funding

Awarded entities were selected through:

- Competitive solicitation, evaluation, and selection of projects according to program guidelines.
- Invitation-only application process to entities (see “Intended Recipients” above) that met pre-determined High Road criteria and were responsive to CWDB Funding Guidelines and CCI Funding Guidelines.
Element (2) A description of how a proposed expenditure will further the regulatory purposes of Division 25.5 (commencing with Section 38500) of the Health and Safety Code, including, but not limited to, the limit established under Part 3 (commencing with Section 38550) and other applicable requirements of law.

How the expenditure is consistent with the Investment Plan and the Scoping Plan

- HRCC: By investing in multi-craft pre-apprenticeship, focusing on serving priority populations, and advancing the goals of equity, sustainability, and job quality, the High Road Construction Careers program directly meets one of the top three recommendations of the “Cap-and-Trade Auction California Workforce Development Board (CWDB) Expenditure Record for High Road Construction Careers (HRCC) Program 3 Plan and the Scoping Plan Proceeds Third Investment Plan: Fiscal Years 2019-20 through 2021-22,” which is to “increase job training opportunities for priority populations.”

- HRTP: By investing in sector-based training partnerships and planning and research to support economic diversification, focusing on serving AB 1550 priority populations, and advancing the goals of equity, sustainability, and job quality, the High Road Training Partnerships program directly meets one of the top three recommendations of the “Cap-and-Trade Auction Proceeds Third Investment Plan: Fiscal Years 2019-20 through 2021-22,” which is to “increase job training opportunities for priority populations.”

- HRCC and HRTP programs are consistent with California’s 2017 Climate Change Scoping Plan, which affirmed the important role of workforce development and the need to promote resilient economic growth: “Investments and training in education and workforce development for a lower carbon economy are a critical part of this transition.” Likewise, these programs can help to address one of the AB 32 Environmental Justice Advisory Committee’s overarching recommendations for the Scoping Plan to: “Maximize the accessibility of safe jobs, incentives, and economic benefits for Californians and the development of a just transition for workers and communities in and around polluting industries.”
Element (3) A description of how a proposed expenditure will contribute to achieving and maintaining greenhouse gas emission reductions pursuant to Division 25.5 (commencing with Section 38500) of the Health and Safety Code.

Describe how expenditures will facilitate the achievement of GHG emission reductions in the State

This program will facilitate GHG emission reductions by:

- Building climate and economic resilience through training partnerships and systems that: (a) address critical skill issues emerging as industry faces challenges of climate change and environmental sustainability; (b) increase the capacity of firms and workers to adapt and compete in a carbon-constrained economy; and (c) help California communities prosper by creating accessible local pathways into safer, healthier, and more highly skilled jobs.

- Focusing workforce development efforts in industries and occupations involved in: implementing climate change mitigation and adaptation measures; producing, operating, and maintaining new technologies and equipment that reduce GHG emissions; and planning to identify additional industry and workforce needs and opportunities associated with the transition to a carbon-neutral economy.

- Developing a skilled workforce for the construction industry, with a focus on trades or crafts with the highest involvement in climate change mitigation and adaptation projects, which can result in direct and indirect GHG emission reduction projects across multiple sectors.

- Increasing workers' awareness of climate change and environmental sustainability (including knowledge of construction sector specific policy strategies, emission-reducing measures and industry practices, and relevant skills and trades/crafts to pursue) via pre-apprenticeship curriculum and training.
Explain when GHG emission reductions and/or co-benefits are expected to occur and how they will be maintained

- Benefits that result from this program's investment in workforce development will primarily occur once training is completed and incumbent workers advance in their career and employment begins for new workers. GHG emission reductions facilitated by these investments will occur on an ongoing basis as specific projects are implemented and maintained and as new, emission-reducing technologies and equipment are deployed and maintained. Benefits will continue to grow as workers gain more experience and acquire additional skills.

- Benefits that result from this program's investment in comprehensive, regional economic and workforce planning will occur over time as workers impacted by fossil fuel industry decline are connected to various resources (for both immediate and longer-term assistance), and as regional economies diversify and workers are connected to new employment and educational opportunities. GHG emission reductions associated with that transition will occur on an ongoing basis as fossil fuel-based industries decline and shut down, and as new industries that advance carbon neutrality grow and expand.

- GHG emission reductions facilitated by this program's investment will occur on an ongoing basis as pre-apprentices complete this training program and are placed in apprenticeship or other employment, from where they are employed on specific construction projects.

- Upon completion of training, graduates are placed in middle-class careers in the building and construction trades. Benefits will continue to grow as workers gain more experience, acquire additional skills, and advance in their careers.
Element (4) A description of how the administering agency considered the applicability and feasibility of other non-greenhouse gas reduction objectives of Division 25.5 (commencing with Section 38500) of the Health and Safety Code.

**Expected co-benefits, particularly environmental, economic, public health and safety, and climate resiliency**

- This program will deliver economic co-benefits by upskilling incumbent workers and facilitating career advancement, by training and placing new workers in quality jobs, and by building the capacity of training partnerships to establish and meet economic and environmental goals. Improvement in worker health and safety is also achieved through training as well as industry adoption of better practices and cleaner technologies and products. Environmental co-benefits may be achieved as well through deployment of cleaner technologies and products and as workers learn about and implement emission-reducing measures at home and in their community.

- This program will also deliver economic co-benefits by connecting dislocated workers with various financial and education or training resources, and by training and placing workers for new high-quality jobs that advance carbon neutrality.

- This program's investments will help build a resilient workforce and help the most vulnerable communities and individuals adapt and respond to the impacts of climate change.

- Connecting or directly placing pre-apprenticeship graduates in state-registered apprenticeship, construction-sector employment other than apprenticeship, or post-secondary education.

- Environmental and economic co-benefits (e.g., reductions in air pollutant emissions and energy costs) may be achieved as well as pre-apprentices learn about GHG emission-reducing strategies and implement specific measures at home and in their community.

- This program's investments will help build a resilient workforce and help the most vulnerable communities and individuals adapt and respond to the impacts of climate change.
How the project will support other objectives of AB 32 and related statutes

- This program supports other objectives of AB 32, including the reduction of GHG emissions in a manner that: (1) maximizes additional environmental and economic co-benefits for California by investing in high road training partnerships that: engage and build the capacity of California businesses, workers, and community groups; develop ways to improve job quality and equity; and enhance businesses' capacity to compete in a carbon-constrained economy; and (2) directs public and private investment toward the most disadvantaged communities in California by targeting priority populations for workforce development (recruitment, training, supportive services, and placement assistance) and by engaging priority populations in comprehensive, regional economic and workforce planning to support the transition away from fossil fuels and toward a carbon-neutral economy.

- This program also supports the priorities identified in AB 398 by selecting projects that best align with Scoping Plan Sectors, where feasible, to contribute to industries and occupations that are: reducing air toxic and criteria air pollutants from stationary and mobile sources, increasing deployment of zero-emission transportation alternatives, healthy forests and urban greening, reducing short-lived climate pollutants, as well as climate adaptation and resiliency.

Percentage of total funding that will be expended for projects that are located in and benefit priority populations\(^1\) per CARB guidance

- CWDB will establish a target of at least 50 – 60% of program funds to benefit low-income households and residents of Disadvantaged Communities and Low-Income Communities.

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\(^1\) Priority populations include residents of: (1) census tracts identified as disadvantaged by California Environmental Protection Agency per SB 535; (2) census tracts identified as low-income per AB 1550; or (3) a low-income household per AB 1550. See Section VII.B for more information on the definitions of priority populations.
Describe the benefits to priority populations per CARB guidance

- Projects will provide comprehensive, high-quality workforce development to priority populations, including job training, supportive services, and placement assistance.
- Projects will also benefit priority populations by including workers and their representatives and community groups in comprehensive, regional economic and workforce planning.
- Pre-apprenticeship projects will benefit priority populations by providing multi-craft construction education and training, industry-recognized certification, supportive services (to help complete training, prepare for apprenticeship requirements, and gain lifelong employability skills), and job or postsecondary education placement assistance.
**Explain strategies the administering agency will use to maximize benefits to disadvantaged communities**

- Serving disadvantaged Californians and their communities through strategic workforce programs is central to CWDB's mission, and a key strategy to achieving one of CWDB's primary policy objectives which is to enable upward mobility for all Californians.
- To determine planning and program priorities, CWDB will coordinate with and convene workforce, industry, as well as community leaders.
- CWDB will directly fund projects that do at least one of the following:
  - Prioritize quality jobs and upward mobility for residents of disadvantaged communities with immediate and/or long-term impact and benefits.
  - Workforce development programs that will facilitate GHG emission reductions within disadvantaged communities and support other types of environmental improvement.
  - Research, planning, and development of workforce development programs in industries where industry based partnerships do not currently exist and high road training partnerships can directly benefit disadvantaged communities.
  - Partner with community-based organizations for targeted recruitment of priority populations in pre-apprenticeship.
  - Providing or coordinating a variety of supportive services (e.g., stipends, transportation and child care assistance, remedial math and reading coursework, counseling and mentorship) to support participant retention and training completion.
  - Use of the Multi-Craft Core Curriculum (MC3) for pre-apprenticeship to maximize apprenticeship placement opportunities.
  - Promote the expanded use of Project Labor Agreements, Community Workforce Agreements, and other similar measures (e.g., targeted hire ordinances) to create demand for apprentices that have earned the MC3 certificate.
  - Research and education about the High Road Construction Careers program to expand this model to other construction training programs in California.
Explain how the administering agency will avoid potential substantial burdens to disadvantaged communities and low-income communities or, if unknown, explain the process for identifying and avoiding potential substantial burdens

- CWDB will engage with past grantees, community groups, and other stakeholders to identify potential burdens and ensure program design, expectations, and requirements are realistic, inclusive, and address the specific needs of priority populations. CWDB will make programmatic adjustments to eligibility criteria, and ultimately funding decisions, as necessary to avoid potential substantial burdens.
- CWDB will engage with community and workforce leaders to determine thresholds and situations that could affect eligibility for, or continuation of, public assistance. CWDB will provide guidance to applicants and require that they identify responses and pro-active solutions to address this potential substantial burden; CWDB will evaluate and consider these measures in project selection.
- CWDB will engage with communities and community leaders to address environmental concerns (including but not limited to GHG emissions) in order to identify key issues within a geographical area that can be addressed by these programs.
- CWDB will encourage regional training partnerships to include community-based, faith-based, or non-profit organizations with expertise in working with priority populations and ability to anticipate and meet participants' needs through supportive services.
- CWDB will engage with community and workforce leaders to determine thresholds and situations that could affect eligibility for, or continuation of, public assistance. CWDB will provide guidance to applicants and require that they identify responses and pro-active solutions to address this potential substantial burden; CWDB will evaluate and consider these measures in project selection.
- CWDB requires HRCC regional training partnerships to include community-based, faith-based, or non-profit organizations with expertise in working with priority populations and ability to anticipate and meet participants' needs through supportive services.
Element (5) A description of how the administering agency will document the result achieved from the expenditure to comply with Division 25.5 (commencing with Section 35800) of the Health and Safety Code.

How the administering agency will track/report progress to make sure projects are implemented per requirements in statute and CARB guidance

- Funding recipients will complete customized templates and report quarterly on progress, challenges, successes, and outcomes. CWDB will determine data-collection and reporting requirements prior to project implementation and provide guidance. CWBD will report to CARB semiannually through the tracking and reporting system, consistent with CARB guidance.
- CWDB may also conduct periodic reviews of selected projects. If a funding recipient is not performing in accordance with program requirements, the recipient will be subject to the remedies for non-performance, as identified in forthcoming program guidelines and grant agreements.

Describe the approach that will be used to document GHG emission reductions and/or other benefits before and after project completion

- Funding recipients that directly serve participants will be required to track individual participant data (including but not limited to priority population status) through customized supplemental reporting.
- To document socioeconomic co-benefits, CWDB will require awarded projects to track individual participant and project-level data through customized supplemental reporting. Any outcome data received will be used to conduct an impact assessment that will summarize the co-benefits of the funded projects.
To determine the jobs benefits, CWDB will compile data on direct employment outcomes, consistent with CARB guidance. CWDB will use participant level and project level data to report on the estimated direct jobs produced. The data being collected for this include:
- Participant data will include demographics and socioeconomic characteristics, including but not limited to priority population status.
- Outcomes data will include enrollment, training completion and MC3 certificate attainment, and employment and post-secondary

- CWDB will collect qualitative data on how projects may be facilitating GHG emission reductions.
- CWDB will collect data on project location and how the project benefits priority populations, consistent with CARB guidance.

CWDB will provide regular program updates consistent with CARB guidance, addressing expenditure amounts, project development, participants and training outcomes, and other benefits identified by the project, CARB and/or CWDB.