

**REVIEW OF
CONSTRUCTION CONTRACT COMPLIANCE ADMINISTRATION (CCCA)
FIELD OFFICE REVIEWS
FOR LOCAL AGENCY PROGRAM (LAP) PROJECTS
EEO/OJT/DBE/WAGES**

PURPOSE: *To conduct an in-depth review of LAP projects to determine if EEO contract administration procedures are being administered by the project administrator and resident compliance specialist in accordance with FHWA 1273, FDOT Equal Opportunity Construction Contract Compliance Procedure 275-020-002, FDOT EEO Construction Contract Compliance Workbook, Local Agency Program (LAP) Manual.*

Date of Review:	Reviewer:
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Local Agency:	
Project Manager:	EEO Compliance Officer:

PROJECT INFORMATION:

FPID No.:	FAP No.:
Project Description:	
LAP Contract No:	LAP Agreement Expiration Date:
LAP Funding: Phase 38: Phase 58: Local Matching: Total Funding:	NHS: SHS: Federal Aid Highway:
Contract Letting Date:	
Construction NTP:	Final Completion Date:
Actual Start Date:	Actual Project Completion Date:

CONTRACTOR INFORMATION:

Prime Contractor: Address:	Contact Person: Address:
Phone:	Fax:
Contract Amount:	# Construction Days:
DBE:	DBE % Pledged:
EEO Officer:	
Liquidating Damages in Contract:	

CONSTRUCTION ENGINEERING & INSPECTION (CE&I) FIRM:

CEI Firm: Address:	Contact Person: Name: Address:
Phone:	Fax:
Contract Amount:	# Construction Days:
DBE:	DBE % Pledged:
Is the CEI responsible for monitoring EEO Compliance?	

ADMINISTRATION:

1. Does the Resident Compliance Specialist have a copy or have access to a copy of Procedure 275-020-002 and the EEO Construction Contract Compliance Workbook?
2. Does the Resident Compliance Specialist regularly attend Contract Compliance training and are they cognizant of all contract compliance requirements?
3. Where are the EEO records kept?
4. Who is responsible for maintaining the EEO records?
5. Is all EEO/DBE/OJT/Payroll mail date stamped when received?
6. Is the Bid Blank/Bid Tabulation on file?
7. Is the beginning and ending construction dates for the prime contractor and subcontractor(s) on file/documented?

EEO

8. Pre-construction Meeting:
 - A. Are minutes of the Preconstruction Conference kept on file?
 - B. Were these meeting minutes remitted to FDOT?
 - C. Are EEO/OJT/DBE/WAGES and payroll provisions specified in the minutes?
9. EEO Officer:
 - A. Has the Contractor's EEO Officer been identified?
 - B. Was identification of the EEO Officer included on the job-site bulletin board?
10. EEO/AA Plan:
 - A. Does the Contractor have an EEO/AA Plan?
11. EEO Meetings:
 - A. Did the Contractor hold Supervisory and Office Personnel Meetings?
 - B. Did the Contractor communicate EEO Information to Project Personnel?
12. EEO Reports:
 - A. Company Wide EEO Report (Form 275-021-07)?
 - (1) If the Company Wide EEO Report indicates that the contractor's minority and/or female hiring goal(s) was not met, is an explanation from the contractor on file explaining why the Federal requirement wasn't met and the specific efforts they are making to meet those requirements(s)?
 - B. Project EEO Report (or annotation of race/sex on payrolls) (Form 275-101-12)?
13. EEO Contractor Analysis:
 - A. Has the LA performed an EEO Contractor Analysis and obtained the necessary information to determine the contractor has processes and procedures in place to monitor:
 - (1) Recruitment Program?
 - (2) Non Segregated Facilities?
 - (3) Analysis for Non Discrimination?
 - (4) Subcontractors?

B. Was the frequency of the EEO Contractor Analysis reasonable based on the length of the project?

14. Project Bulletin Board:

A. Has the project bulletin board been inspected for compliance (this must be in place on or before the first day workers are on the project)?

B. Did the bulletin board contain all the required notifications for:

- (1) EEO Officer
- (2) Posters
- (3) Wage Decision

C. Was the bulletin board inspected during the project at reasonable intervals to determine continued compliance?

15. Complaints:

A. Have there been any complaints of discrimination filed by any employee of the prime contractor or subcontractor(s)? If so, what was the resolution?

16. Non Compliance:

A. What actions are taken by the Compliance Specialist when there is evidence of non-compliance with the EEO Special Provisions by the contractor?

17. Certification of Compliance with EEO:

A. Is the Certification Compliance with Equal Employment Opportunity (EEO) Provisions on Federal Aid Contracts obtained with each monthly invoice?

18. Annual July EEO Report:

A. Was the annual July EEO report obtained and submitted to FDOT for further reporting with both complete/accurate data and in a timely manner?

DAVIS BACON ACT/WAGES

19. Does the Davis-Bacon Act apply to this contract? (YES/NO) *If no, then questions 20 thru 21 are not applicable.*

20. Weekly Payrolls:

- A. Has the contractor pay period and pay date been identified and documented?
- B. Is the contractor/subcontractor(s) submitting required certified weekly payrolls within 7 days of the pay date?
- C. Are weekly payrolls being properly checked and filed?
- D. Are payroll violations issued if necessary and tracked for proper and timely correction by the contractor?
- E. Are deductions checked to determine compliance with the approved list of USDOL deductions? If not, has an additional deduction request been submitted to USDOL and approval obtained?

21. Wage Decision:

- A. Is the applicable Wage Decision available for checking monthly payrolls in the office of the Compliance Officer?
- B. Are the weekly payrolls being checked for proper job classification and corresponding wage rate?
- C. Have any additional job classification been requested/approved?

22. Labor/EEO Interviews:

A. Are the required number of labor/compliance interviews being performed in accordance with the frequency outlined in the FDOT Contract Compliance Workbook?

- B. Have any issues of non-compliance been identified as a result of these labor interviews? If so, what actions were taken?
- C. Have any trucker interviews been performed and has the appropriate follow up activity taken place is necessary?

ON-THE-JOB TRAINING

23. Do OJT provisions apply to this contract? (YES/NO) *If no, then questions 24 thru 28 are not applicable.*

24. Meeting Minutes:

- A. Are post pre-construction training evaluation meeting minutes contained in the files?

25. OJT Schedule:

- A. Is the OJT Training Schedule on file, including any revisions?
- B. Has a revised OJT Schedule been prepared and submitted for approval based on any missed action dates?
- C. Are proficiencies on file for each trainee?

26. Notification of Trainee Personnel Action Form (PAF):

- A. Is the Notification of Trainee Personnel Action Form (PAF) on file, including:
 - (1) Disadvantaged Certifications (if needed)?
 - (2) Trainee ID Card?
 - (3) Additional Actions (if necessary)?

27. Training Hours:

- A. Are training hours verified with:
 - (1) Payrolls?
 - (2) Daily/Weekly(s) inspection reports?
 - (3) Trainee Monthly Time Reports?

28. Graduation:

- A. Is the Request for Proficiency Observation on file and proper approval noted of having obtained the proficiencies?
- B. Is follow-up conducted to ensure at time of graduation, employee is being paid proper wages?

DISADVANTAGED BUSINESS ENTERPRISE (DBE) MONITORING

29. Does the Prime Contractor have a DBE/AA plan on file?

30. Anticipated DBE Participation Statement (ADBEPS):

- A. Is there an ADBEPS on file for the prime Contractor?
- B. Was it remitted to FDOT at the pre-con meeting or within 3 days?

31. DBE Subcontractors:

- A. Is the FDOT website checked to determine the subcontractor is a certified DBE?

32. DBE Activity:

- A. Do project personnel record DBE daily activities on the project in the daily diary?
- B. Is the DBE being monitored to determine if they are performing and/or completing the items of work subcontracted to them with their own work force?

33. DBE Payments:

- A. Are DBE payment(s) entered into the FDOT Bizweb monitoring systems?

34. DBE Goal:

- A. If it is determined that the prime contractor is not achieving the pledged DBE participation goal what action is taken by your office?

SUBCONTRACTORS

35. Is the Certificate of Sublet Work and/or Notice of Rental Agreement being used to notify, review and provide proper approval of subconsultants on the project?
36. Is the Certification Disbursement of Previous Periodic Payment to Subcontractors (Form 700-010-38) submitted with the monthly invoice?

SUBCONTRACTOR: (to be completed for each subcontractor)

Name:	
Services Provided:	
Contract Amount:	DBE:
Start Date:	End Date:

A. EEO Files

Files contain the following:

Authorization to Sublet
EEO Officer/Jobsite Bulletin Board
EEO/AA Plan
EEO Supervisory Meetings
EEO Personnel Meetings
Company Wide EEO Report
Project EEO Report
Beginning/Ending Construction Dates
Documents/Reports Date Stamped
Compliance Interviews

B. WAGES

Files contain the following:

Statement of Compliance and Certified Payrolls

Payrolls Checked For:

Name, address, social security number
Wage Classification
Race/Gender
Deductions/Authorizations, when applicable
Math Errors
Filed Properly

Payroll Violations:

How Many?
Written payroll violations notice on file?
Monthly progress payments withheld?

REVIEWER'S FINDINGS / RECOMMENDATIONS

FINDINGS:

RECOMMENDATIONS:

Signature of the Reviewer

Title

Date