Part A. Agency Overall Labor Standard Administration

HUD Review Date(s)

1. Agency Information

a. Agency Name	b. Agency Address	c. DBLS Agency No. CPD/PIH No. (if different):
d. Principal Program Director/Executive Director	e. Agency Labor Standards Officer	f. Agency Telephone No.

g. Agency Personnel Contacted During Review

Name	Title	Phone
Name	Title	Phone
Name	Title	Phone
Name	Title	Phone
Name	Title	Phone
Name	Title	Phone

h. Projects/Contracts Reviewed

Project Name and Identifier	**Brief Description**	**Contract/Budget Amount**

Part A., Continued

2. Agency Labor Standards Officer (LSO) / Staff	Yes	No	NA
a. Agency staff includes an LSO, or key staff person with primary responsibility for labor compliance?	☐	☐	☐
b. LSO is informed of all proposed projects funded/assisted with HUD funds?	☐	☐	☐
c. LSO usually has sufficient time to obtain wage decisions and include in bid documents?	☐	☐	☐
d. LSO approval required prior to advertisement of contracts?	☐	☐	☐
e. LSO approval required on all payments to contractors?	☐	☐	☐
f. LSO examines subrecipient/subgrantee/subcontract management firm contract activity as necessary?	☐	☐	☐

3. Federal Labor Standards Monitoring Review Process	Yes	No	NA
a. Procedure established to verify inclusion of correct wage decision and labor standards provisions?	☐	☐	☐
b. Procedure established to verify/document contractor eligibility (www.sam.gov)?	☐	☐	☐
c. Payrolls/documents are examined regularly to assess Federal labor standards compliance?	☐	☐	☐
d. Procedure established to conduct/target employee interviews?	☐	☐	☐
e. Violations and corrective actions are communicated timely?	☐	☐	☐
f. Maintains a system to track deficiencies & resolves them timely, and in accordance with established requirements?	☐	☐	☐
g. Procedure established to track complaint resolution?	☐	☐	☐
h. Examines subrecipient/subgrantee/subcontract management entity files as necessary?	☐	☐	☐
i. Schedule for monitoring subgrantees:	________		☐
j. Total subgrantee monitoring reviews performed during past __________ months:			☐

4. Wage Decision Issuance Process	Yes	No	NA
a. Maintains a system to ensure that applicable wage decisions are obtained / applied timely?	☐	☐	☐
b. Wage decision requests processed correctly (correct WD type and WD number)?	☐	☐	☐
c. Wage decision modifications issued timely?	☐	☐	☐
d. Maintains system to verify wage decision “lock-in?”	☐	☐	☐

5. HUD-Determined Maintenance Wage Rate Administration and Enforcement	Yes	No	NA
a. Does the agency effectively administer HUD-determined maintenance wage rates for its regular staff?	☐	☐	☐
b. Does the agency effectively administer HUD-determined maintenance wage requirements for other force account work?	☐	☐	☐
c. Does the agency effectively administer HUD determined maintenance wage rates (routine/non-routine) wage requirements in contracted work?	☐	☐	☐
d. Does the agency correctly utilize training or apprenticeship programs for workers subject to HUD-determined maintenance wage rates?	☐	☐	☐

Provide explanatory information for each "No" response, as needed; NA = Not Applicable

Part A., Continued

6. Training		Yes	No†	NA††
a.	Provides labor standards training for subgrantees, contractors?	☐	☐	
b.	Training materials used are accurate (current)?	☐	☐	☐

7. Other Requirements -- Reports and Escrows				
a.	Makes reports (4710) and recommendations regarding CWHSSA liquidated damages?	☐	☐	☐
b.	Submits Labor Standards Enforcement Reports (5.7), timely and complete?	☐	☐	☐
c.	Number of active escrow agreements:	#:		☐
d.	Total amount of funds escrowed for CWHSSA violations:	$		☐

8. Summary – Labor Standards Administration		A	NI	NA
a.	Staffing	☐	☐	☐
b.	Information systems / tracking mechanisms	☐	☐	☐
c.	Enforcement files / records	☐	☐	☐
d.	Labor Standards review – procedures	☐	☐	☐
e.	Labor Standards reviews – effectiveness	☐	☐	☐
f.	Training	☐	☐	☐
g.	Wage decision issuances	☐	☐	☐
h.	Complaints	☐	☐	☐
i.	Restitution & escrow administration	☐	☐	☐
j.	Reporting requirements – Semi-Annual Reports, Enforcement Reports	☐	☐	☐
k.	HUD-determined wage rate administration	☐	☐	☐

Summary Key -- A: Acceptable; NI: Needs Improvement; NA: Not Applicable

☐ **additional identified deficiencies are on a separate page(s) and attached to this form, along with copies of supporting documentation.**

Labor Standards Specialist **Date**

Part B. Agency Labor Standards Contract Compliance – Davis-Bacon Covered Projects

1. Contract Identification

a. Agency Name	b. Agency Identification	c. Grant No. & Type (Funding Source)
d. Project Name	e. Project Identifier (number, etc.)	
f. Location of Project (City, County, State)	g. Prime Contractor	
h. Description (scope) of work – include number of units & stories for housing projects		i. Contract Amount $
j. Labor Standards Provisions (HUD Form Used)	k. Wage Decision No. Used – Include Type/Mod. Date	l. Bid Opening Date
m. Contract Award Date	n. Construction Start Date	o. % Complete or Completion Date

2. Contract Documents

		Yes	No	NA
a.	Correct labor standards provisions incorporated in contract?	☐	☐	☐
b.	Correct wage decision incorporated in contract?	☐	☐	☐
c.	Was the prime contractor eligibility verification on file (www.sam.gov)?	☐	☐	☐

3. Weekly Payrolls

		Yes	No	NA
a.	Did the agency obtain all payrolls (first to current/last) for each contractor on the job?	☐	☐	☐
b.	All contractors/trades represented by payrolls received?	☐	☐	☐
c.	Payroll data consistent with inspection & on-site reports (HUD-11)?	☐	☐	☐
d.	Payroll certification statements signed by employer or authorized representative?	☐	☐	☐
e.	Apprentices or trainees reported on payrolls?	☐	☐	☐
f.	Apprentice/Trainee certification obtained?	☐	☐	☐
g.	Contractors in compliance with apprentice/trainee ratio requirements?	☐	☐	☐
h.	Do payrolls report generic job classifications (e.g., “mechanic,” “operator,” “installer,” or “journeyman”) not on wage decision?	☐	☐	☐
i.	Do payrolls report job classifications for which an “Additional Classification” request was necessary?	☐	☐	☐
j.	Did the agency obtain DOL approval to add classifications to the wage decision?	☐	☐	☐
k.	Did the agency review to ensure that correct wages were paid in accordance with the wage decision?	☐	☐	☐
l.	Where reported, were payroll deductions permissible per DOL regulations?	☐	☐	☐
m.	If reported, were fringe benefits acceptable per DOL regulations?	☐	☐	☐
n.	Was the Contract Work Hours and Safety Standards Act (CWHSSA) threshold met?	☐	☐	☐
o.	Has any laborer or mechanic worked over 40 hours per week on this project?	☐	☐	☐
p.	If yes to (n) and (o), has overtime been paid for hours worked over 40/wk?	☐	☐	☐
q.	If answer to (n) is yes and (p) is no, was the employer notified to pay restitution & were LD computed?	☐	☐	☐

Provide explanatory information for each "No" response, as needed; NA = Not Applicable

Part B., Continued

4. Employee Interviews	Yes	No	NA
a. Were employee interviews completed?	☐	☐	
b. Did the agency target interviews?	☐	☐	☐
c. Did interviews record work performed by worker and observed by the interviewer?	☐	☐	☐
d. Interviews were compared to payrolls?	☐	☐	☐
e. Did agency send mail-out questionnaires to employees if needed?	☐	☐	☐
f. Did agency follow up on leads developed from interviews/questionnaires?	☐	☐	☐

Provide explanatory information for each "No" response on a separate page; NA = Not Applicable

5. Contract Administration	Yes	No	NA
a. Were contract records available, including all documentation required?	☐	☐	☐
b. Were violations corrected/addressed?	☐	☐	☐
c. Were violations reported to HUD or DOL?	☐	☐	☐
d. Were any complaints received on this contract?	☐	☐	☐
e. Do records indicate other violations (not covered above) that the agency failed to address?	☐	☐	☐

☐ **Additional identified deficiencies are on a separate page and attached to this form, along with copies of supporting documentation (contracts, payrolls, interviews, correspondence, etc.).**

Part C. Agency Contract Labor Standards Compliance – HUD-Determined Wage Rates

1. Contract Identification

a. Agency Name		b. Agency ID and Activity Type
c. Project Name		d. Project Identifier
e. Location of Project		f. Prime Contractor
g. Description of Work		h. Contract Amount
i. Wage Decision Used – Include Effective Date		j. Bid Opening Date
k. Contract Award Date	l. Work Start Date	m. % Complete or Completion Date

2. Contract Documents	Yes	No	NA
a. Labor standards requirements incorporated in contract?	☐	☐	☐
b. Wage rates incorporated in contract?	☐	☐	☐
c. Wage rates correct?	☐	☐	☐
d. Prime contractor eligibility verification, when required, on file (www.sam.gov)?	☐	☐	☐
3. Wage Payment			
a. Has the agency established a method to ensure workers are paid not less than the rate determined by HUD? Describe methodology in attached.	☐	☐	☐
b. Are site inspections or other on-site reports used to corroborate proper classification/payment?	☐	☐	☐
c. Does work require classifications not included on agency's HUD-52158?	☐	☐	☐
d. Did the agency obtain HUD approval to add classifications to the applicable HUD wage decision?	☐	☐	☐
e. Were the correct wages paid in accordance with the applicable HUD-52158?	☐	☐	☐
f. Has the agency established a method to ensure laborers or mechanics working over 40 hours per week on this project have been paid overtime?	☐	☐	☐
4. Employee Interviews			
a. Were employee interviews completed?	☐	☐	☐
b. Did the agency target interviews?	☐	☐	☐
c. Did interviews record work actually performed by the worker and observed by the interviewer?	☐	☐	☐
d. Were interviews compared to the HUD-determined rate schedule?	☐	☐	☐
e. Did the agency send mail-out questionnaires to employees if needed?	☐	☐	☐
f. Did the agency follow up on leads developed from interviews/questionnaires/on-site reports, etc.?	☐	☐	☐

Provide explanatory information for each "No" response, as needed; NA = Not Applicable

Part C. Continued

5. Contract Administration	Yes	No	NA
a. Were contract records available, including all documentation required?	☐	☐	☐
b. Were violations/discrepancies (misclassification, underpayment, etc.) corrected?	☐	☐	☐
c. Were any complaints received on this contract?	☐	☐	☐
d. Do records indicate other violations (not covered above) that the agency failed to address?	☐	☐	☐

Provide explanatory information for each "No" response, as needed; NA = Not Applicable

☐ **additional identified deficiencies are on a separate page and attached to this form, along with copies of supporting documentation (contract payrolls, interviews, correspondence, etc.).**

Part D. Agency Maintenance Wage Rate Administration

Agency Name	Agency ID No.

1. Maintenance Wage Enforcement

		Yes	No	NA
a.	Are the agency's personnel policies for maintenance laborers and mechanics acceptable?	☐	☐	☐
b.	Does the agency have position descriptions that describe work performed by maintenance staff?	☐	☐	☐
c.	Is a copy of the current HUD-52158 on file?	☐	☐	☐
d.	Do the maintenance classifications/wage rates identified in the current operating budget correspond to the current HUD-52158?	☐	☐	☐
e.	Are employees working within assigned classifications?	☐	☐	☐
f.	Are employees properly compensated for hours worked over 40 per week?	☐	☐	☐
g.	Were maintenance employees interviewed? Number interviewed: _____	☐	☐	☐
h.	Has the agency conducted work employing force account workers? If yes, record individual projects using force account employees on Part E, Force Account Work.	☐	☐	

2. Training, Apprenticeship

		Yes	No	NA
a.	Does the agency participate in an apprenticeship program for maintenance employees?	☐	☐	☐
b.	Has the agency obtained HUD approval for maintenance apprenticeship program?	☐	☐	☐
c.	Does the agency participate in job/skill training for agency residents or other low-income persons that involves operations or development of the agency?	☐	☐	☐
d.	Does the agency employ youth in maintenance at any time during the year?	☐	☐	☐
e.	Are youth compensated at less than prevailing rates?	☐	☐	☐

Provide explanatory information for each "No" response, as needed; NA = Not Applicable

Part E. Agency Labor Standards Compliance – Force Account Work

This review guide, Part E, is for work performed by the regular employees of a PHA, IHA, TDHE or DHHL or by other workers hired by the agency specifically for the project or work item (i.e., "Force Account" labor). Depending on the type of work, HUD Routine Maintenance, HUD Non-Routine Maintenance, or Davis-Bacon wage rates could apply to the work.

If a contractor performed part of the force account work, fill-out Part B, Davis-Bacon or Part C, HUD-Determined Wage Rates to review the contracted work.

1. Project Identification

a. Agency Name	b. Activity Type (development or operations) / Grant No. (If Any)	
c. Project Name	d. Project Identifier / Work Item Number	
e. Location of Project	f. Description of Work	
g. Budgeted Cost (Labor & Materials)	h. Work State Date	i. % Complete or Completion Date
j. HUD Maintenance Wage Decision– Include Effective Date and Routine/Non-Routine or Davis-Bacon Wage Decision – Include Type/Mod. Number		

	2. Enforcement – General	Yes	No	NA
a.	Has the agency established a method to ensure force account workers are paid not less than the rate required? Describe methodology on separate sheet.	☐	☐	☐
b.	Did the agency maintain work records for employees showing employee name, address, Social Security Number?	☐	☐	☐
c.	Did the agency maintain work records showing daily hours worked, classification (trade), pay rate & deductions for each worker?	☐	☐	☐
d.	Were apprentices or trainees employed on the project?	☐	☐	☐
e.	Was the apprentice/trainee program approved? (if no apprentices, answer 'NA')	☐	☐	☐
f.	Were apprentices/trainee ratio requirements met? (if no apprentices, answer 'NA')	☐	☐	☐
g.	Did applicable wage decision include all classifications needed for completion of the project?	☐	☐	☐
h.	If No to (g), did the agency obtain approval from/through HUD DBLS to add classifications?	☐	☐	☐

3. Project Administration

		Yes	No	NA
a.	Were any worker complaints received from workers or others?	☐	☐	☐
b.	Were violations (misclassification, underpayment, etc.) corrected?	☐	☐	☐

Provide explanatory information for each "No" response, as needed; NA = Not Applicable

Part X. Exit Conference

Agency Name & LSIS No.	
Conference Location	Conference Date, Time
Attendees	
Reviewer(s) Name(s), Title(s)	

The following principal subjects were discussed; additional items covered are described in any detailed minutes attached. Agency representatives were advised of problem areas, and were provided the opportunity to question and discuss the basis for preliminary conclusions.

☐ **Staffing -** Knowledge, capacity, sufficient number for volume of work – Is the work that is being done effective? Is there a disproportionate amount of covered activity not being reviewed?

☐ **Information systems / tracking mechanisms** – Note: agencies have very wide latitude in the configuration, locations and functioning of the system.

☐ **Enforcement files / records** - agencies have very wide latitude in the configuration, locations and functioning of the system. The focus in this section is that complete records for covered activities are maintained for the duration required and that they be retrievable in a reasonable time. As with management systems, “blind spots” can be brought to the attention of the agency, reviewers are cautioned about requiring revisions in the absence of violations resulting from a flawed system.

☐ **Labor standards review – procedures** – State agency processes to review funded/assisted projects for applicability of labor standards, ensuring appropriate wage decisions/determinations and labor standards provisions are included in agreements/orders for covered work and that project records are established and managed with the knowledge of appropriate officials and offices of the agency.

☐ **Labor standards reviews – effectiveness** – Outcomes of state’s systems and efficiency, including actions of state grantee agencies and management firms.

☐ **Technical assistance & training** – Quality and effectiveness of the technical assistance & training provided by the state to its grantees, contractors, and management firms. Also covers the technical assistance and training needs of the state’s staff.

☐ **Wage decision issuances** – State’s application of wage decisions/determinations, including applying changes.

☐ **Complaints** – Actual complaints received, or procedures established/needed.

☐ **Restitution & escrow administration** – Conclusions concerning the ‘perfection’ of restitution. Were certified payroll reports submitted for the restitution payments, as well as an assurance of future compliance? Were sufficient funds retained, when needed? Were funds handled appropriately? Does the state have appropriate documentation on the circumstances requiring escrows?

☐ **Reporting requirements – Semi-Annual reports, Enforcement reports** – Conclusions about the validation of the reports sent to HUD/DOL.

☐ **Other** (list below or on separate sheet(s)

☐ **Preliminary conclusions**

☐ **Any disagreements**

☐ **Any required follow-up actions by LCA or reviewer(s)**

☐ **Conference participants (list name, organization, title or attach sheet)**

☐ **Additional Notes**