



Coquille Indian Housing Authority

2678 Mexeye Loop • Coos Bay, OR 97420

March 31, 2021

Mr. Eugene Hairston
Davis-Bacon & Labor Standards Officer
U.S. Department of Housing and Urban Development
Office of Davis-Bacon & Labor Standards, DBLS
909 First Avenue, Suite 200
Seattle, WA 98104-1000

Subject: Response to Federal Labor Standards Monitoring Report Finding 1

Dear Mr. Hairston:

As required by the DBLS Federal Labor Standards Monitoring Report issued March 2, 2021, the Coquille Indian Housing Authority (CIHA) has taken corrective actions to remedy Finding 1 – Employee Interviews. Below are the corrective actions listed in the Report (in bold), followed by CIHA's response (in blue):

1. Review HUD Handbook 1344.1, REV-2, CHG-1, CHP5-8, C (1-6); 8-8 (A) 5&6; 8-14 (B) 1&2; for guidance for conducting on-site or mail-out interviews;

CIHA Labor Standards Officer (LSO) Deputy Director Lyman Meade, Administrative Services Coordinator Debbie Dennis, and I have reviewed *HUD Handbook 1344.1, Rev 2* in its entirety. The handbook has been made readily available for quick reference in CIHA work areas and offices.

2. Review HUD's Labor Relations Desk Guide, "Making Davis-Bacon Work – A Practical Guide for States, Indian Tribes, and Local Agencies". Use this guide as a compliment for guidance and instruction in addition to HUD Handbook 1344.1, Rev-2, Federal Labor Standards in HUD Programs;

CIHA LSO Deputy Director Lyman Meade, Administrative Services Coordinator Debbie Dennis, and I have thoroughly reviewed *HUD's Labor Relations Desk Guide* and *Making Davis-Bacon Work – A Practical Guide for States, Indian Tribes, and Local Agencies*. Both are readily available for quick reference in CIHA work areas and offices along with *HUD Handbook 1344.1, Rev 2*.

3. Create a project review checklist to establish policies and procedures for employee interviews and use it as a monitoring review guide for Davis-Bacon & HUD Determined

wage rate activities. Submit a copy of the checklist to this office and follow up with a conference call to discuss your plan of action.

CIHA has begun to use the Federal Labor Standards Compliance – Davis-Bacon and Related Acts (DBRA) Checklist for contracts over \$2,000 made available by HUD DBLS as a best practice. CIHA has developed and is using a similar checklist for HUD Determined maintenance wage rate activities. Copies of both checklists are attached.

- 4. Conduct on-site or mail-out interviews on all active/open projects missing interviews and compare it to the respective employer's corresponding records; the results of the comparison, including all discrepancies, shall be noted in the space provided for the payroll examiner's comments; the payroll examiner shall sign and date each HUD-11 at the completion of each comparison; and if there is evidence of discrepancies and underpayments; then it must be brought to the employers attention to be resolved; and report the results to the HUD Davis-Bacon & Labor Standards Office in writing and follow up with a conference call;**

All active/open and completed projects for FY 2021 have been reviewed to determine that employee interviews have been conducted and results compared to certified payrolls. Examination found no exceptions or discrepancies.

In addition to reviewing current projects, diligent efforts have been made to remedy the missing employee interviews noted in the monitoring review.

- 801 Miluk Drive Water Collection Tank Installation Project – A HUD-11 form (attached) has been prepared for the self-employed owner/operator of Stacy Plumbing and Mechanical in accordance with the instructions provided in Labor Standards and Enforcement Letter No. LR-96-01.
- 2646 Fourplex Painting Upgrade Project – Staff conducted extensive research to locate Elite Painting's former employee for interview. Contact attempts were made by calling the employee's last known telephone number, by email to multiple potential email addresses, and by mailing to multiple potential physical addresses. All efforts to date have been unsuccessful. Record of CIHA's attempts to make contact are attached for reference.

- 5. Prepare a Corrective Action Plan (CAP) after the Agency's receipt of the Final remote monitoring report. The plan should be sent to my attention and should detail:**

- **Determination of root cause;**
- **Description of proposed corrective action to address root cause(s);**
- **Application of a preventative action to prevent future recurrence of the problem or related issue;**
- **The date action is expected to be completed and, current status of the action item.**

Please see Corrective Action Plan attached.

Letter to Eugene Hairston, HUD DBLS Officer, Seattle Region

March 31, 2021

Page 3 of 3

6. Finally, CIHA will send its designated labor standards officer and staff to attend future Davis-Bacon / Federal labor standards training in Fiscal year 2021.

CIHA LSO Deputy Director Lyman Meade, Administrative Services Coordinator Debbie Dennis, and I attended the HUD Federal Labor Standards – Davis Bacon 101/DOL Prevailing Wage Rate & Section 3 Training webinar held March 8, 2021. Staff will attend additional trainings offered in the future.

I would like to schedule a conference call at your earliest convenience to review the corrective actions that CIHA has taken and discuss any further recommendations you may have to strengthen CIHA's compliance with HUD DBLS requirements.

Sincerely,



Anne F. Cook
Executive Director

Federal Labor Standards Compliance – Davis-Bacon and Related Acts (DBRA) Checklist
PUBLIC HOUSING, TRIBALLY DESIGNATED HOUSING ENTITY, TRIBAL HOUSING PROGRAM ADMINISTERING
NAHASDA, NHHL and COMMUNITY DEVELOPMENT PROGRAMS
Davis-Bacon and Related Acts applicable for contracts over \$2,000

Project Name/Number: _____ Contract Dollar Amount: _____

- Prepare bid/contract documents
- Obtain Davis-Bacon Wage Rate <https://beta.sam.gov/> - Date: _____
- Federal Labor Standard Provisions (check one that applies)
https://www.hud.gov/program_offices/administration/hudclips/forms
PIH-HUD-5370 EZ ____ (Contracts \$2,000 - \$100,000) HUD-5370 ____ (Contracts over \$100,000)
CPD-HUD-4010 ____ (Contracts over \$2,000)
- 10 days prior to bid opening check wage determinations for any modifications
 - If there is a modification notify all bidders of change or document reason for non-notification
Notification date: _____
 - Sign contract within 90 days of bid opening. If not, obtain new wage decision
Contract signature date: _____
 - For additional wage rates email HUD-4230A to DOL at
whd-cbaconformance_incoming@dol.gov
https://www.hud.gov/program_offices/administration/hudclips/forms/hud4
Date emailed: _____ Date DOL response received: _____
- Verify contractor eligibility at www.sam.gov (prior to contact execution & print result for project file)
 - Debarred Not Debarred Date: _____
- Provide contractor training – Date: _____
Handouts: Wage Decision
 Applicable Federal Labor Standards Provisions
 Contractor Guide Book
 Explain additional classification process for trades missing from wage decision
 Other items local contracting agency wants to add to contractor packet
- Employees Rights under the Davis-Bacon Act poster (take picture of postings on site to include in project file)
English: <http://www.dol.gov/whd/regs/compliance/posters/fedprojc.pdf>
Spanish: <http://www.dol.gov/whd/regs/compliance/posters/davispan.pdf>
Date posted on job site: _____
- Conduct weekly or monthly (determined on the duration of project) on-site interviews using HUD-11
Date: _____ Date: _____ Date: _____ Date: _____ Date: _____
- Receive weekly payrolls; identify conduct payroll reviews; identify deficiencies; compare payrolls to Employee Interviews (HUD-11);
When required, obtain supporting documentation to verify apprenticeship status, J/A ratio, apprentice percentage of pay, and employee signed deduction authorization forms for other deductions identified on the certified payrolls.
Follow-up required: _____
- Resolve all discrepancies, including overtime payments. If required, send questionnaires, using HUD Form 4730, to workers to verify pay data. Follow-up required: _____
DBLS Forms: https://www.hud.gov/program_offices/administration/hudclips/forms

Federal Labor Standards Compliance

HUD Routine and Non-Routine Maintenance Checklist

Project Name/Number: _____ Dollar Amount: _____

Contractor Name: _____ Phone # _____

- Prepare bid/contract documents RFP RFQ PO _____
- Determine Routine or Non-Routine Maintenance
 - Routine
 - Non-Routine
- Federal Labor Standards Provision HUD-5370-C for Non-construction (check applicable sections) https://www.hud.gov/sites/documents/DOC_12588.PDF
 - Section 1 With or Without Maintenance Work
 - Section 2 With Maintenance Work
- Verify contractor eligibility at www.sam.gov Date checked _____
 - Debarred, not eligible
 - Not debarred
- Wage Decision HUD-52158 or equivalent Date posted _____
- Additional classification needed? Yes No
- Employee Interviews HUD-11
Date _____ Date _____ Date _____ Date _____ Date _____
Follow-up required _____
- Resolve all discrepancies, including overtime payments. If required, send questionnaires, using HUD Form 4730, to workers to verify pay data. <https://www.hud.gov/sites/dfiles/OCHCO/documents/4730.pdf>
Follow-up required _____
- Oregon CCB (if applicable) _____ Date checked _____
- Certificate of Insurance Expires _____
- Background checks Date completed _____
- Project Start Date _____ Project End Date _____

Record of Employee Interview

U.S. Department of Housing and Urban Development Office of Labor Relations

OMB Approval No. 2501-0009
(exp.01/31/2021)

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid OMB control number. The information is collected to ensure compliance with the Federal labor standards by recording interviews with construction workers. The information collected will assist HUD in the conduct of compliance monitoring; the information will be used to test the veracity of certified payroll reports submitted by the employer. **Sensitive Information.** The information collected on this form is considered sensitive and is protected by the Privacy Act. The Privacy Act requires that these records be maintained with appropriate administrative, technical, and physical safeguards to ensure their security and confidentiality. In addition, these records should be protected against any anticipated threats or hazards to their security or integrity that could result in substantial harm, embarrassment, inconvenience, or unfairness to any individual on whom the information is maintained. **The information collected herein is voluntary, and any information provided shall be kept confidential.**

1a. Project Name Water Collection Tank Installation			2a. Employee Name Rayce Stacey			
1b. Project Number			2b. Employee Phone Number (including area code) 541-290-9687			
1c. Contractor or Subcontractor (Employer) Stacey Plumbing and Mechanical Co			2c. Employee Home Address & Zip Code 1349 Highland Avenue, Coos Bay, OR 97420			
			2d. Verification of identification? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>			
3a. How long on this job? 2 days	3b. Last date on this job before today? 6/5/18 & 6/6/18	3c. No. of hours last day on this job? 4 hrs each day	4a. Hourly rate of pay? ** See remarks	4b. Fringe Benefits? Vacation Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Medical Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Pension Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	4c. Pay stub? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

5. Your job classification(s) (list all) --- continue on a separate sheet if necessary
Plumber

6. Your duties
Install pump, valves, pipes, and pressure tank for pump

7. Tools or equipment used
Hand tools, pipe cutters, insulation

8. Are you an apprentice or trainee?	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>	10. Are you paid at least time and 1/2 for all hours worked in excess of 40 in a week?	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
9. Are you paid for all hours worked?	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>	11. Have you ever been threatened or coerced into giving up any part of your pay?	Y <input type="checkbox"/> N <input checked="" type="checkbox"/>

12a. Employee Signature	12b. Date
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13. Duties observed by the Interviewer (Please be specific.)
Connecting plumbing and pump to rainwater collection tanks

14. Remarks
Total cost \$3580 less materials <\$890> = \$2690 / 8 (2 days x 4 hrs./day per WOs 3581 & 3582) = \$336.25/hr. effective wage rate

15a. Interviewer name (please print) N/A	15b. Signature of Interviewer N/A	15c. Date of interview N/A
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Payroll Examination

16. Remarks
Effective wage rate calculation indicates Davis Bacon wage requirement of \$ 27.32 + \$9.86 fringe required by General Decision Number OR180034, mod 4 was exceeded.

17a. Signature of Payroll Examiner <i>Neborah L Dennis</i>	17b. Date 03/09/21
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Subject **Mail delivery failed: returning message to sender**
From Mail Delivery System <Mailer-Daemon@cp.mydfn.net>
To <debbiedennis@coquilleiha.org>
Date 2021-03-08 17:41



- Part 3.eml (~4 KB)

This message was created automatically by mail delivery software.

A message that you sent could not be delivered to one or more of its recipients. This is a permanent error. The following address(es) failed:

✘ jeffreyheilbronn@yahoo.com
host mta7.am0.yahoodns.net [67.195.204.73]
SMTP error from remote mail server after end of data:
554 30 Sorry, your message to jeffreyheilbronn@yahoo.com cannot be delivered. This mailbox is disabled (554.30).

Reporting-MTA: dns; cp.mydfn.net

Action: failed
Final-Recipient: rfc822;jeffreyheilbronn@yahoo.com
Status: 5.0.0
Remote-MTA: dns; mta7.am0.yahoodns.net
Diagnostic-Code: smtp; 554 30 Sorry, your message to jeffreyheilbronn@yahoo.com cannot be delivered. This mailbox is disabled (554.30).

Subject **Coquille Indian Housing Authority**
From Debbie Dennis <debbiedennis@coquilleiha.org>
To <jeffreyheilbronn@yahoo.com>
Date 2021-03-08 16:01

Good afternoon Jeff - I am Debbie with the Coquille Indian Housing Authority in Coos Bay. In September and October 2019 you were listed as one of the employees of Elite Painting that painted one of our fourplexes out here on Tribal Lands.

While you were here, one of our staff should have completed an employee interview with you so that we could assure that you were being paid the Davis Bacon wage rates required by HUD, that you were paid for all hours worked at the correct wage classification, and that you were not asked to return any of your pay. That interview did not occur and HUD has performed monitoring of our programs and is asking us to complete the interview at this time.

WE WOULD BE HAPPY TO PAY YOU FOR YOUR TIME THAT THIS INTERVIEW TAKES.

Please give me a call at **541-404-1339** at your earliest convenience to conduct the interview and arrange payment to you.

Thank you,

Debbie Dennis
Administrative Services Coordinator

Coquille Indian Housing Authority

Subject **Mail delivery failed: returning message to sender**
From Mail Delivery System <Mailer-Daemon@cp.mydfn.net>
To <debbiedennis@coquilleiha.org>
Date 2021-03-08 15:56



- Part 3.eml (~4 KB)

This message was created automatically by mail delivery software.

A message that you sent could not be delivered to one or more of its recipients. This is a permanent error. The following address(es) failed:

✉ jeffheilbronn@yahoo.com
host mta5.am0.yahoodns.net [67.195.204.79]
SMTP error from remote mail server after end of data:
552 1 Requested mail action aborted, mailbox not found

Reporting-MTA: dns; cp.mydfn.net

Action: failed
Final-Recipient: rfc822;jeffheilbronn@yahoo.com
Status: 5.0.0
Remote-MTA: dns; mta5.am0.yahoodns.net
Diagnostic-Code: smtp; 552 1 Requested mail action aborted, mailbox not found

Subject **Coquille Indian Housing Authority**
From Debbie Dennis <debbiedennis@coquilleiha.org>
To <jeffheilbronn@yahoo.com>
Date 2021-03-08 15:56

Good afternoon Jeff - I am Debbie with the Coquille Indian Housing Authority in Coos Bay. In September and October 2019 you were listed as one of the employees of Elite Painting that painted one of our fourplexes out here on Tribal Lands.

While you were here, one of our staff should have completed an employee interview with you so that we could assure that you were being paid the Davis Bacon wage rates required by HUD, that you were paid for all hours worked at the correct wage classification, and that you were not asked to return any of your pay. That interview did not occur and HUD has performed monitoring of our programs and is asking us to complete the interview at this time.

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Thank you,

Debbie Dennis
Administrative Services Coordinator

Coquille Indian Housing Authority

Subject **Mail delivery failed: returning message to sender**
From Mail Delivery System <Mailer-Daemon@cp.mydfn.net>
To <debbiedennis@coquilleiha.org>
Date 2021-03-08 15:59



- Part 3.eml (~4 KB)

This message was created automatically by mail delivery software.

A message that you sent could not be delivered to one or more of its recipients. This is a permanent error. The following address(es) failed:

*jeffheilbron@yahoo.com
host mta6.am0.yahoodns.net [67.195.228.111]
SMTP error from remote mail server after end of data:
552 1 Requested mail action aborted, mailbox not found

Reporting-MTA: dns; cp.mydfn.net

Action: failed
Final-Recipient: rfc822;jeffheilbron@yahoo.com
Status: 5.0.0
Remote-MTA: dns; mta6.am0.yahoodns.net
Diagnostic-Code: smtp; 552 1 Requested mail action aborted, mailbox not found

Subject **Coquille Indian Housing Authority**
From Debbie Dennis <debbiedennis@coquilleiha.org>
To <jeffheilbron@yahoo.com>
Date 2021-03-08 15:58

Good afternoon Jeff - I am Debbie with the Coquille Indian Housing Authority in Coos Bay. In September and October 2019 you were listed as one of the employees of Elite Painting that painted one of our fourplexes out here on Tribal Lands.

While you were here, one of our staff should have completed an employee interview with you so that we could assure that you were being paid the Davis Bacon wage rates required by HUD, that you were paid for all hours worked at the correct wage classification, and that you were not asked to return any of your pay. That interview did not occur and HUD has performed monitoring of our programs and is asking us to complete the interview at this time.

WE WOULD BE HAPPY TO PAY YOU FOR YOUR TIME THAT THIS INTERVIEW TAKES.

Please give me a call at **541-404-1339** at your earliest convenience to conduct the interview and arrange payment to you.

Thank you,

Debbie Dennis
Administrative Services Coordinator

Coquille Indian Housing Authority



Coquille Indian Housing Authority

2678 Mexeye Loop • Coos Bay, OR 97420

March 9, 2021

Jeffrey Heilbronn
2490 N. 16th Street
Coos Bay, OR 97420

RE: Employee Interview for work performed on Coquille Tribal Lands

Dear Mr. Heilbronn:

Back in September and October 2019, Elite Painting company painted one of our fourplex units here on Coquille Tribal Lands. You were listed on their certified payroll as one of the employees performing that work.

While you were here, one of our staff should have completed an employee interview with you in order for us to assure that you had been paid the Davis Bacon wage rates required by HUD, that you were paid for all hours worked at the correct wage classification, and that you were not asked to return any of your pay to your employer. That interview did not take place and HUD is requesting that we complete the interview at this time.

CIHA would be willing to pay you for one hour of your time at that same Davis Bacon wage rate for the quick phone interview.

Please give me a call at (541) 404-1339 at your earliest convenience to conduct the interview and arrange for payment to you. Alternatively you may call Lyman Meade, Deputy Director or stop by the CIHA office, if that is more convenient for you.

If you have any questions, please do not hesitate to give me a call.

Respectfully,

Debbie Dennis
Administrative Services Coordinator



Coquille Indian Housing Authority

2678 Mexeye Loop • Coos Bay, OR 97420

March 9, 2021

Jeffrey Heilbronn
1800 S. 28th Ct. #47
Coos Bay, OR 97420

RE: Employee Interview for work performed on Coquille Tribal Lands

Dear Mr. Heilbronn:

Back in September and October 2019, Elite Painting company painted one of our fourplex units here on Coquille Tribal Lands. You were listed on their certified payroll as one of the employees performing that work.

While you were here, one of our staff should have completed an employee interview with you in order for us to assure that you had been paid the Davis Bacon wage rates required by HUD, that you were paid for all hours worked at the correct wage classification, and that you were not asked to return any of your pay to your employer. That interview did not take place and HUD is requesting that we complete the interview at this time.

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Please give me a call at (541) 404-1339 at your earliest convenience to conduct the interview and arrange for payment to you. Alternatively you may call Lyman Meade, Deputy Director or stop by the CIHA office, if that is more convenient for you.

If you have any questions, please do not hesitate to give me a call.

Respectfully,

Debbie Dennis
Administrative Services Coordinator



Coquille Indian Housing Authority

2678 Mexeye Loop • Coos Bay, OR 97420

March 9, 2021

Jeffrey Heilbronn
140 Market Avenue #4
Coos Bay, OR 97420

RE: Employee Interview for work performed on Coquille Tribal Lands

Dear Mr. Heilbronn:

Back in September and October 2019, Elite Painting company painted one of our fourplex units here on Coquille Tribal Lands. You were listed on their certified payroll as one of the employees performing that work.

While you were here, one of our staff should have completed an employee interview with you in order for us to assure that you had been paid the Davis Bacon wage rates required by HUD, that you were paid for all hours worked at the correct wage classification, and that you were not asked to return any of your pay to your employer. That interview did not take place and HUD is requesting that we complete the interview at this time.

CIHA would be willing to pay you for one hour of your time at that same Davis Bacon wage rate for the quick phone interview.

Please give me a call at (541) 404-1339 at your earliest convenience to conduct the interview and arrange for payment to you. Alternatively you may call Lyman Meade, Deputy Director or stop by the CIHA office, if that is more convenient for you.

If you have any questions, please do not hesitate to give me a call.

Respectfully,

Debbie Dennis
Administrative Services Coordinator

Return Service Requested

No forwarding, only return. New address notification provided.

Mailpiece returned with new address or reason for nondelivery attached.

No charge. Appropriate single-piece First-Class Mail or Priority Mail price charged.
Return postage charged at appropriate single-piece price.³
Mail price charged.



COQUILLE
75 N BIRCH ST
COQUILLE, OR 97423-1287
(800)275-8777

03/09/2021 11:31 AM

Product	Qty	Unit Price	Price
Love 2021	3	\$0.55	\$1.65
Grand Total:			\$1.65
Cash			\$1.65

USPS is experiencing unprecedented volume
increases and limited employee
availability due to the impacts of
COVID-19. We appreciate your patience.

en your Mail

Coquille Indian Housing Authority
2678 Mexeye Loop
Coos Bay, OR 97420



RETURN SERVICE REQUESTED

Jeffrey Heilbronn
140 Market Avenue #4
Coos Bay, OR 97420

Coquille Indian Housing Authority
2678 Mexeye Loop
Coos Bay, OR 97420



RETURN SERVICE REQUESTED

Jeffrey Heilbronn
1800 S. 28th Ct. #47
Coos Bay, OR 97420

Coquille Indian Housing Authority
2678 Mexeye Loop
Coos Bay, OR 97420



RETURN SERVICE REQUESTED

Jeffrey Heilbronn
2490 N. 16th Street
Coos Bay, OR 97420

Coquille Indian Housing Authority
2678 Mexeye Loop
Coos Bay, OR 97420

EUGENE OR 974

9 MAR 2021 PM 3 L



NIXIE 971 DE 1 0000/10/21
RETURN TO SENDER
NO MAIL RECEIPTABLE
UNABLE TO FORWARD
BC: 974207712058 *2009-06040-10-17

RETURN SERVICE REQUESTED

*return to sender
not at this address*

RECEIVED

MAR 18 2021

COQUILLE INDIAN
HOUSING AUTHORITY

Jeffrey Heilbronn
140 Market Avenue #4
Coos Bay, OR 97420

NMR
974207712058

Coquille Indian Housing Authority
2021 Federal Labor Standards Monitoring Report
FINDING 1 Employee Interviews

Corrective Action Plan

- **Determination of Root Cause**

- The staff member assigned the task of conducting employee interviews was on vacation and no staff covered that activity while he was gone.
- HUD-11 form not used for all employee interviews

- **Description of proposed corrective action to address root cause(s)**

- Three staff members are now assigned to conduct employee interviews so that there is always someone available to cover that task.
- All employee interviews will be conducted and documented using only the HUD-11 form.

- **Application of a preventative action to prevent future recurrence of the problem or related issue**

- An abbreviated checklist will be added to CIHA's purchase order form to ensure HUD DBLS and other compliance and documentation requirements are clearly identified.
- Staff will use HUD's Federal Labor Standards Compliance – Davis-Bacon and Related Acts (DBRA) Checklist and CIHA's Federal Labor Standards Compliance – Routine & Non-Routine Maintenance Checklist for HUD Determined wage rate activities.
- A separate labor file will be maintained for each project that requires Davis-Bacon or HUD Determined prevailing wage rates.
- If appropriate, work orders will be assigned to ensure completion of employee interviews.
- CIHA's LSO or their designee will review each labor file prior to releasing payment to the contractor to ensure all necessary documentation is complete.

- **The date action is expected to be completed and, current status of the action item.**

Work is complete.