



Program Evaluation and Audit

**Central Corridor
Light Rail Transit (Green Line)**

*Civil East, Civil West, and
Operations & Maintenance Facility
Prevailing Wage Compliance Reviews*

June 1, 2012

INTRODUCTION

Background

The \$957 million Central Corridor Light Rail Transit Project-Green Line (Green Line) will link downtown St. Paul and downtown Minneapolis along Washington and University avenues via the state Capitol and the University of Minnesota. Passengers will have the ability to board or alight from Green Line vehicles at 18 new stations plus five that will be shared with the Blue Line-Hiawatha LRT (Blue Line).

The Metropolitan Council (Council) is the grantee of federal funds and is charged with building the Green Line in partnership with the Minnesota Department of Transportation. The Central Corridor Management Committee, which includes commissioners from Ramsey and Hennepin counties, the mayors of St. Paul and Minneapolis and representatives of the University of Minnesota, provides advice and oversight. Funding is provided by the Federal Transit Administration (FTA), the Counties Transit Improvement Board, the state of Minnesota, Ramsey and Hennepin counties' regional railroad authorities, the city of St. Paul, the Metropolitan Council and the Central Corridor Funders Collaborative.

Three Green Line construction contracts are included in this review. The Council awarded a contract to Walsh Construction (Walsh) on June 23, 2010, for seven miles of Green Line Civil East Construction (CE) in St. Paul at a cost of \$205.1 million, which includes stakeholder betterments totaling \$10.4 million. On August 25, 2010 an Ames Construction/C. S. McCrossan joint venture (Ames/McCrossan) was awarded a \$113.8 million contract to build the three-mile Minneapolis segment of the Green Line (CW), which includes betterment work valued at about \$1 million. This section of the Green Line includes the Interstate 35W flyover bridge and the University of Minnesota transit mall. The third contract under review was awarded December 8, 2010, to PCL Construction Services Inc. (PCL). This \$43.1 million contract was awarded for the purpose of converting a vacant factory building in St. Paul into the Green Line Operations and Maintenance Facility (OMF). A fourth contract for Systems construction has not advanced far enough to obtain sufficient auditable data and is beyond the scope of this review. However, the Green Line Project Director has assured Audit that the results of this review will also be applied to Systems construction.

Green Line construction began in August 2010 on the planned 11-mile route with revenue service expected to begin in late 2014. The Green Line will connect with the Blue Line at the Metrodome station in Minneapolis and with the Northstar commuter rail line at the Target Field Station.

Assurances

This audit was conducted in accordance with the Institute of Internal Auditors' *International Standards for the Professional Practice of Internal Auditing* and the U. S. Government Accountability Office's *Government Auditing Standards*.

Scope

This review was limited to an evaluation of compliance with Davis-Bacon Act prevailing wage requirements regarding certified payroll (CP/R) reviews, worker interviews and contracted prevailing wages as practiced on the Civil East, Civil West and Operations & Maintenance Facilities construction projects. A fourth project for Systems construction is beyond the scope of this review. However, the results of this review will be applied to future Systems construction.

Methodology

To gain an understanding of the practices conducted by Green Line personnel to comply with Davis-Bacon Act requirements, the following methods of inquiry were used:

- Metro Transit management, construction and engineering personnel were interviewed.
- Contract documentation was reviewed and analyzed.
- Outside agency practices were researched and compared.
- Federal and State prevailing wage rates were compared and payroll documentation reviewed.
- Council, Metro Transit and Central Corridor Project Office (CCPO) policies, procedures and work instructions were reviewed.

OBSERVATIONS

Civil East Construction

Certified Payroll Reviews

The CP/Rs from May 2011 through November 2011 were not reviewed until December 12-13, 2011. All CP/Rs are initially received by construction field office (CFO) personnel. Those received prior to May 2011 were reviewed soon after being received. However, the May through November 2011 CP/Rs were sent to the CCPO prior to review and remained there until they were returned to the CFO in mid-December 2011.

The CP/Rs were retained at the CCPO to accumulate and analyze contractor direct labor hours actually worked on the job compared to what was agreed to in the contract. This was in preparation of possible claims by the contractor. It was determined by plotting actual paid work to the contracted work schedule, that the Contractor was slow to ramp up construction in the spring which led them to missing some milestones. The Contractor did not refute these findings.

Regardless of CR/P location, CFO personnel were responsible for reviewing them in a timely manner. Although CCPO personnel had a valid reason for using the CP/Rs, it was not necessary to store them at the CCPO the entire time. To effect timely adjustments, when needed, CP/Rs should be reviewed soon after being received. Upon review by Audit, the following was disclosed:

- The Office Engineer receives CP/Rs with the monthly pay application. Field office personnel requested the contractor/sub-contractors submit CP/Rs monthly rather than weekly as required by federal prevailing wage regulations.
- Certified payrolls submitted with the first pay application for September 2010 were reviewed immediately. Those received with the second pay application were reviewed two months after being received. Those submitted with pay applications seven (June 2011) and nine (August 2011) were not reviewed until December 2011.
- The September 2010, October 2010 and June 2011 pay applications accounted for 122 CP/Rs from 21 different firms, all of which were reviewed. Eighty-one of the CP/Rs were submitted appropriately, 40 had minor errors and one did not meet the prevailing wage requirements. The contractor was subsequently notified January 12, 2012 and responded on January 27 and February 24, 2012. Additional correspondence was exchanged between CFO personnel and the Contractor throughout February and March. As of April 2012, most of the minor errors and the prevailing wage issue had been resolved.
- Pay application nine was reviewed by Audit in great detail. Each of the 140 CP/Rs submitted by 31 firms was reviewed by CE field office personnel. In 33 instances both the *Quarterly Certified Payroll Review* form and the *Wage Compliance Checklist* were complete. For the remaining 107 CP/R reviews,

either one or the other form was incomplete. However, by May 15, 2012 CFO staff had completed the required actions.

- The percentage of CP/Rs with errors fell as work on the project progressed, ranging from 100% with the first pay application to 14% on pay application nine (see below).

App #	Errors	Total	Error %
1	2	2	100%
2	18	23	78%
7	21	97	22%
9	20	140	14%

- Of the 20 errors with pay application nine CP/Rs, 19 were minor and one disclosed wages paid that did not meet requirements.

Workforce Interviews

Worker interviews were conducted four times from project inception through November 2011, an insufficient number to comply with CCPO policy that stated they should be conducted monthly. Interviews were conducted with the contractor and six sub-contractors as follows:

- On three occasions, the contractor was chosen and 19 interviews were conducted.
- Subcontractors were chosen seven times, in which 39 interviews were conducted.
- Eight different trades were represented by workers belonging to 14 different job classifications.
- The nine interviews conducted in June 2011 were not analyzed by CFO personnel regarding compliance until May 11, 2012.

In June 2011, 18 contractors submitted 97 CP/Rs, but interviews were conducted with only nine employees from three of those firms. In August 2011, 31 contractors submitted 140 CP/Rs, but interviews were conducted with only 15 employees from four contractors.

Each time interviews were conducted, workers were selected based upon availability of a group of workers at a single site. This basis for selection did not meet the requirements stated in the CCPO policy in force at the time that “the CAR or designee interview randomly selected employees of the Contractor and the subcontractors, making an effort to obtain a cross section of the workforce.” The selection process was neither random nor did it obtain a cross section of the workforce.

Civil West Construction

Certified Payroll Reviews

Certified Payrolls are received bi-weekly by the Office Engineer who usually reviews them within 10 days of receipt. Those from July through November were held at the CFO. Earlier CP/Rs had been sent to the CCPO.

A total of 342 weekly CP/Rs was received from 26 contractors/subcontractors during the period June 15, 2011 through November 15, 2011. Sixty-one of the 342 CP/Rs (17.84%) were selected for review by the Office Engineer. Sixteen contractors/subcontractors submitted 29 of the 61 CP/Rs, all of which contained the required documentation. The remaining 10 contractors submitted 32 CP/Rs, 17 of which contained the required documentation; one CP/R contained an instance of incorrect wages paid to a worker which was subsequently corrected and eight contained minor infractions such as a missing worker identification number or address. In six instances, the CCPO *Wage Compliance Checklist* (Form 620-08-A) was not included with the documentation.

Audit also reviewed the 12 CP/Rs for the period December 3, 2010 through March 14, 2011 that were located at the CCPO. These 12 CP/Rs represented 32 contractor P/R weeks, 30 (93.75%) of which were reviewed by CFO personnel. Twenty-six had been submitted properly. In the remaining four instances, the Office Engineer incorrectly indicated the worker address was included on the CP/R when it was not.

Workforce Interviews

Workforce interviews were conducted as time permitted in May, August, September, October and November 2011. No interviews were conducted in June or July. During these five monthly periods, workers from eight different firms were interviewed, with different workers from four of those firms interviewed in two monthly periods. The number of workers interviewed ranged from two to 10 for any one contractor/subcontractor. During this period, the Office Engineer conducted 46 interviews. The analysis to determine if the rates received were in compliance with contract requirements had not been completed until May 17, 2012.

Operations & Maintenance Facility Construction

The Council's Authorized Representative (CAR) is responsible for prevailing wage reviews and conducting workforce interviews. Unlike the CE and CW projects in which an Office Engineer and administrative personnel were delegated these tasks by the CAR, the OMF project did not have those resources. In addition, Minnesota Department of Transportation personnel were assigned the CAR responsibilities for the facility. These personnel were not familiar with CCPO prevailing wage policies. As a result, even though PCL and its subcontractors submitted 239 weekly CP/Rs over a nine month period from February 2011 through October 2011, none were reviewed nor were any worker interviews conducted. Audit notified CCPO management personnel who

arranged for the immediate correction of these practices. Audit's review of those corrective actions follows:

Certified Payroll Reviews

Operations and Maintenance Facility CFO personnel reviewed 100% of the monthly CP/Rs submitted by PCL and its subcontractors (CCPO policy requires only a statistically valid random sample). Audit reviewed Forms 620-08-A (*Wage Compliance Checklist*) and 620-08-C (*Quarterly Certified Payroll Review*), finding that both forms had not been adequately filled in.

- *Wage Compliance Checklist*
 - For July through November, of the 25 items listed on the checklist, only non-compliant items were so indicated and no project heading information was provided.
 - For May 2011, only the first 13 of 25 items listed were annotated, either "y" or "n," and the project heading information was missing.
 - For June 2011, some forms stated the project and included responses to all 25 checklist items while others included responses to only those that were non-compliant.
- *Quarterly Certified Payroll Review* – None of the forms were signed, nor did they indicate when the contractor was notified of non-compliance. Subsequently, the contractor was notified of non-compliance on January 10, 2012 and the forms signed on May 10, 2012.

The OMF representative sent a letter to the contractor in late December 2011 identifying the CP/R issues that were found. The contractor responded on February 7, 2011, for pay applications one and two and on February 24, 2012, for numbers three through eight. Audit reviewed all contractor responses for pay applications one and two, finding that those problems identified by OMF personnel had been corrected. Audit then judgmentally reviewed pay applications three through eight, again noting that all the corrections requested by the CAR had been made.

Workforce Interviews

Audit verified that worker interviews were conducted on December 16, 2011. However, an analysis of the worker responses was not conducted until much later. How much later is unknown, for Form 620-08-B *Certified Payroll Responses* that is used to record worker responses and compare them to contracted prevailing wages does not provide for separate dating of that analysis. Audit received the analyzed forms the beginning of April 2012 and noted that in three instances it was indicated that the contractor was notified of a discrepancy in which the worker interviewed may have been paid a non-compliant wage. However, there is no evidence of Green Line personnel follow-up to make a final determination. The Green Line Deputy Project Director has assigned an intern the task of conducting future interviews and analyzing the results in a timely manner.

Contracted Prevailing Wage Rates

According to federal prevailing wage requirements, the bid opening date is the date to which federal wage determinations apply as long as the contract is awarded within 90 days of that date. Once that date is determined, the most recent federal wage rate determination in effect prior to that date will apply to the resultant contract for the duration of the project. Audit reviewed the bid opening and contract award dates of the three construction contracts under review. All contracts were awarded within the 90 day period. Therefore, the bid opening date is the key date in determining which prevailing wage rates apply.

The Green Line is funded by both the state of Minnesota and the FTA (in addition to other funding partners). Both Minnesota and FTA require the inclusion of prevailing wage rates in their funded contracts. It is Council practice, as stated in contract *Supplemental Conditions for FTA & Minnesota* (Form 00711), to apply either the Minnesota rate or the federal rate, whichever is “most beneficial to the employees.” Discussions with project field office personnel disclosed that both CE and CW certified payroll reviews and worker interview analyses were conducted in this fashion.

Audit also identified the appropriate date of the wage rates that should be included in the three contracts and compared those to the contractually dated wage rates. The CE and CW contracts contain the appropriate state dated wage rates, but not the appropriately dated federal ones. The OMF contract contains both the appropriately dated federal and state wage rates.

Audit then judgmentally sampled nine state and seven federal labor classifications to determine if any difference existed between the actual contracted and the appropriate wage rates. Of 27 state rates tested (the same nine for each of the three contracts), no differences were found. The same was true for the 21 federal rates tested (the same seven for each of the three contracts).

Policies, Procedures and Regulatory Requirements

As previously mentioned, CCPO revised its Procedure *620-08 Prevailing Wage Review for FTA Compliance* midway through the audit when it was brought to their attention that some of its practices did not align with its procedure or industry best practices.

Procedure 620-08 - Prevailing Wage Review for FTA Compliance

The Deputy Project Director, with input from Audit regarding best practices and sampling techniques, updated the existing procedure to better describe adequately controlled actual practices. The procedure was also revised to define the sampling methods that are to be used and to incorporate best practices based on a review of industry practices regarding both CP/R reviews and worker interviews. Applicable personnel were also trained in the new procedures that went into effect in February 2012.

Neither the Davis-Bacon Act, nor FTA regulations nor FTA guidelines provide specific guidance regarding the number and frequency of either certified payroll reviews or on-site workforce interviews. Audit conducted a review of Council, Metro Transit, CCPO and outside agency policies and procedures to determine best practices and evaluate compliance with Minnesota State statutes and FTA regulations. The results of that review follows:

Certified Payroll Reviews

The review of outside agency procedures disclosed that for one agency, a spot check of a representative sample be conducted based on assessed risk of non-compliance with a minimum of once within two weeks of project initiation and again two weeks prior to completion of work. Metro Transit Work Instruction C-50 requires that for projects six months or longer, the CAR is to review random certified payrolls at least once every three months. Revised CCPO Procedure 620-08 - *Prevailing Wage Review for FTA Guidance* provides for randomly chosen monthly certified payroll reviews.

On-Site Workforce Interviews

The review of outside agency procedures revealed a common practice of spot checking a representative sample and schedule of reviews based on an assessed risk of non-compliance with a minimum of one review within two weeks of the initial certified payroll submission and two weeks prior to the completion of work. Another agency required a minimum of one interview or 10% of the on-site workforce each time interviews were conducted. Yet another agency required at least one interview for each contractor/subcontractor throughout the life of the project, and for multi-year projects, once with all contractor/subcontractors each season. Metro Transit Instruction C-50, *Certified Payrolls*, July 1, 2008, requires “random interviews at least once every six months, . . . with an effort made to obtain a cross section of the workforce and at least 10% of the workforce is to be interviewed.” This is the same requirement as stated in the CCPO procedure.

Form 620-08-B, *Certified Payroll Responses*, is used to document when worker interviews are conducted and the results of those interviews. The current form is divided into two sections, one for data obtained during the interview and the other analyzing that data. These two tasks are performed separately and usually many days apart. However, the form only has a single date line, giving the false impression that all work was performed on a single day. The form also has no lines for signatures or approvals. In addition, it has a “*Contractor Notified*” column in which a normal notation was usually “yes” or “no”. The form has no place in which to record information regarding the contractor’s response or the adequacy of that response.

CONCLUSIONS

Central Corridor Project Office personnel have revised policy and practices to ensure that the contractors and sub-contractors constructing the Green Line are paying workers local prevailing wages in accordance with state and federal requirements. They have also conducted mandatory training for the CCPO field personnel who have responsibility for conducting CP/R reviews and worker interviews. In addition, CP/R reviews and worker interviews have now been conducted on the OMF project. These actions resulted from discussions between Audit and CCPO personnel during the course of this review, in which the following conditions were found to exist:

1. Civil East

- Certified Payrolls
 - The completeness of CP/R reporting by the contractor/sub-contractors increased as time passed. Some type of error appeared in all of the CP/Rs reviewed in pay application one. By the time pay application nine was reviewed, this rate of error had fallen to 14%.
 - Certified payrolls were not reviewed in a timely manner. Although initially received by field office personnel, the CP/Rs for May through November 2011 were subsequently sent to the CCPO where they remained until being sent back to the field office in December 2011, at which time they were reviewed.
 - As requested by field office personnel, CP/Rs were submitted monthly when, according to federal prevailing wage regulations, they should be submitted weekly.
- Worker Interviews
 - Worker interviews were conducted frequently; however, workers were not selected according to the “random” and “cross section of the workforce” criteria stated in CCPO policy.
 - Generally, CFO personnel analyzed the interview information they received to determine compliance with prevailing wage requirements. However, in June 2011, nine interviews were conducted, none of which were analyzed until May 2012.
- Contracted Prevailing Wage Rates
 - Minnesota rates are correct.
 - The most current federal rates as of the bid opening date were not included in the contract.

2. *Civil West*

- Certified Payrolls
 - Most CP/Rs were submitted properly. Only one was found to contain an incident of apparent non-prevailing wage which was subsequently corrected by the sub-contractor.
 - Certified payrolls were reviewed in a timely manner. They were received within 14 days after the end of the pay period and reviewed by CFO personnel within 10 days.
 - Most CP/Rs were reviewed accurately by CFO personnel, although Audit did find a few minor errors in recording information on the *Wage Compliance Checklist*. In addition, on six occasions, the checklist could not be located.
- Worker Interviews
 - Similarly to Civil East, worker interviews were conducted frequently; however, workers were not selected according to the “random” and “cross section of the workforce” criteria stated in the CCPO policy.
 - The worker interviews were not analyzed in a timely manner to reconcile worker statements with contract requirements. This was not completed until May 17, 2012.
- Contracted Prevailing Wage Rates
 - Minnesota rates are correct.
 - The most current federal rates as of the bid opening date were not included in the contract.

3. *Operations and Maintenance Facility*

- Certified Payrolls and Worker Interviews – Neither had been attempted until Audit discussed this condition with the Project Manager. However, upon notification, both were conducted with the following results:
 - Certified Payrolls – All CP/Rs submitted by the contractor/subcontractors were reviewed when only a sample is required. Documentation of those reviews has been completed and all recommended corrections were made by the contractor/subcontractors.
 - Worker Interviews – They were conducted. However, due to the layout of the form upon which the results are documented, it is unknown when the analysis of worker responses was performed and if the contractor has made any needed corrections.
- Contracted Prevailing Wage Rates
 - Minnesota rates are correct.
 - Federal rates are correct.

RECOMMENDATIONS

Program Evaluation and Audit recommendations are categorized according to the level of risk they pose for the Council. The categories are:

- **Essential** – Steps must be taken to avoid the emergence of critical risks to the Council or to add great value to the Council and its programs. Essential recommendations are tracked through the Audit Database and status is reported twice annually to the Council’s Audit Committee.
- **Significant** – Adds value to programs or initiatives of the Council, but is not necessary to avoid major control risks or other critical risk exposures. Significant recommendations are also tracked with status reports to the Council’s Audit Committee.
- **Considerations** – Recommendation would be beneficial, but may be subject to being set aside in favor of higher priority activities for the Council, or may require collaboration with another program area or division. Considerations are not tracked or reported. Their implementation is solely at the hands of management.
- **Verbal Recommendation** – An issue was found that bears mentioning, but is not sufficient to constitute a control risk or other repercussions to warrant inclusion in the written report. Verbal recommendations are documented in the file, but are not tracked or reported regularly.

1. (Essential) Green Line personnel should review certified payrolls and conduct workforce interviews according to current policy and analyze the results in a timely manner.

Civil East, Civil West and Operations & Maintenance Facility CFO personnel complied in varying degrees with CCPO policy regarding administration of contract prevailing wage requirements. For example, Civil East requested submission of CP/Rs monthly but did not review them until December 2011, Civil West received them bi-weekly and reviewed them within 10 days of receipt and OMF personnel received them monthly but did not review them until after Audit inquired. Regarding workforce interviews, Civil East personnel generally reconciled the information received from workers to contracted prevailing wage rates, Civil West personnel reconciled the information after the audit inquiry and OMF personnel did not conduct interviews until after Audit had inquired. Consistent compliance with CCPO policy provides a basis for strong contract administration and project control and a means for ensuring compliance with FTA regulations and Minnesota state law.

Management Response: *Although project staff has ensured since the start of each of the contracts that the required certified payrolls are submitted by the contractor, the certified payroll submittal and review schedule has varied for each of the contracts. CCPO management acknowledges that certified payrolls and prevailing wage interviews should be reviewed in a more consistent manner across contracts. CCPO management has*

already held training for key staff in February 2012 to ensure that all certified payrolls are submitted weekly and reviewed in a timely manner and that interviews are conducted at a minimum of once every six months (more often if necessary) and analyzed in a timely manner. To assist in both the tracking and transparency of this effort, the CCPO is now utilizing the e-Builder project management system to automatically assign the certified payroll reviews and worker interviews to appropriate project staff on a pre-determined schedule which complies with FTA regulations and Minnesota state law. The e-Builder system is also being utilized to obtain the required oversight approvals by the Council Authorized Representative and Assistant Construction Manager per CCPO procedures. Reports have been set up in e-Builder to automatically notify CCPO Management if required reviews are not completed by the pre-determined schedule. In summary, strong internal controls have been set in place leveraging the e-Builder project management system to ensure compliance with prevailing wage requirements throughout the remainder of the contracts.

Staff responsible: *CCPO Deputy Project Director, Project Controls and Construction Managers, Assistant Construction Managers, Council Authorized Representatives and Office Engineers.*

Timetable: *This has already been implemented and is being tracked through the e-Builder project management system.*

2. (Essential) Green Line personnel should amend the construction contracts to include the appropriate federal wage rate determinations.

Each construction contract should contain the most current Minnesota and federal prevailing wage rates as of the respective project bid opening date. The CE and CW contracts contain the appropriate Minnesota prevailing wage rates, but not the appropriate federal rates. The OMF contract contains both the appropriate federal and state rates. It is important for both rates to be current as of the bid opening date, for when reviewing CP/Rs and evaluating responses received during worker interviews, accurate analyses cannot be conducted absent the appropriate rates.

Management Response: *Neither of the contracts can be amended for the rates, for the contractor cannot be held responsible retroactively for rates that were not identified prior to bid opening. Staff has been instructed, starting immediately, to print and put out in an addenda 10 days before bid opening, any new rates.*

Staff Responsible: *Director, Council Contracts and Procurement*

Timetable: *Immediately*

3. (Significant) Green Line personnel with responsibility for administering construction contracts should continue to be provided periodic training to remain current on and ensure compliance with CCPO policy, FTA regulations and Minnesota state law.

Field office personnel administering the CE, CW and OMF construction contracts performed their duties differently one from another. When used effectively, periodic training is a valuable internal control to ensure that a consistent and compliant approach is used in administering prevailing wage and other requirements of the individual Green Line contracts. Such training was conducted subsequent to discussions between Audit and CCPO personnel regarding the results of this review. Due to personnel changes, changes in contract requirements and basic forgetfulness of the human condition over time, such training needs to be conducted at periodic intervals.

Management Response: *CCPO Management agrees with the recommendation to provide ongoing training. In addition to the refresher training that was held in February 2012, there is another training session scheduled for June 4, 2012 to train two new Office Engineers that are now on staff as well as a number of new interns and other administration staff who will be assisting in the prevailing wage reviews this summer. The training effort will continue with one-on-one training as needed. With the reports and information now accessible in e-Builder, CCPO Managers will easily be able to pinpoint any issues with compliance which will assist in focusing additional training efforts where needed.*

Staff Responsible: *CCPO Deputy Project Director, Project Controls Manager, Project Controls Engineer*

Timetable: *This has been an ongoing effort and will continue throughout construction. The next training session is scheduled for June 4, 2012.*

4. (Significant) Green Line personnel should revise Form 620-08-B Certified Payroll Responses in order to maintain a complete record of worker prevailing wage interview responses, CFO analyses and contractor actions taken in regard to possible payment of non-compliant wages.

Form 620-08-B facilitates three functions; conducting the initial worker interview, sending the contractor a notice of possible non-compliance and evaluating the contractor's response. The current form contains a single date line, no signature lines and no place to indicate the result of a final determination of compliance/non-compliance. Maintaining a complete and consolidated record of prevailing wage compliance issues that arise when interviewing workers can effectively reduce the risk to the Council's reputation if an outside inquire arises or when the FTA conducts similar audits.

Management Response: *This form has been revised to add additional fields to track dates and signatures; however, the nature of the multiple back-and-forth correspondence on the prevailing wage issues that the CCPO has been experiencing with its contractors is not easily documented in a single form. Instead, CCPO Management is utilizing the e-*

Builder project management system to track all forms and correspondence on any issues with non-compliance that are encountered. This method allows staff to review and monitor non-compliance issues as these issues remain “open” in e-Builder until they are resolved. This approach is also easier for the contractor to track.

Staff Responsible: *Deputy Project Director, Project Controls Manger, Project Management Systems Administrator*

Timetable: *This has already been implemented and is being tracked in e-Builder.*