

DAVIS BACON & BUY AMERICA ACT

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University of Kansas

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Facilities Management and Planning
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Who we are and what we do

Michelle Ginavan Hayes

- ❑ Assistant Director, Research Admin.
- ❑ Central Administration
- ❑ Over 12 years in Research administration
- ❑ Focused mainly on proposals, post-award, contracts and general grants management
- ❑ Coordinate research education & training opportunities
- ❑ I am a research administrator and I don't do construction ... or at least not before this year.

Dori D. Smidt

- ❑ Business Operations Manager
- ❑ Facilities Management and Planning
- ❑ 2 Years in FMP
- ❑ 11 years Financial Accounting and Compliance
- ❑ Manage FMP projects, Service Centers, etc
- ❑ ARRA - first federal construction projects

Davis-Bacon & Davis-Bacon and Related Acts

- History and Overview
- Compliance with Davis-Bacon
- Common Problems

Davis Bacon Act

- Signed into law on March 3, 1931 by President Hoover.
- Federal law establishing requirement to pay prevailing wages on public works projects.
- Applies to federal contracts > \$2,000 directly for construction work.
- Act directs the Secretary of Labor to determine such local prevailing wage rates



Photo from Wikipedia.org

Davis Bacon and Related Acts

- ❑ The Davis-Bacon Act applies to contractors and subcontractors performing work on federal or District of Columbia contracts.
- ❑ The Davis-Bacon Act prevailing wage provisions apply to the “Related Acts,” under which federal agencies assist construction projects through grants, loans, loan guarantees, and insurance.

Davis-Bacon Related Acts and ARRA

- Specific language in the American Recovery and Reinvestment Act of 2009, required all construction projects that receive ARRA funds to comply with all requirements of the Davis-Bacon Act.
- This designation requires *all* ARRA projects, whether fully or partially funded or assisted, to comply with the prevailing wage requirements of the Davis-Bacon Act.
- Section 1606 – Prevailing Wage Requirement

Basic Requirements

- ❑ Must pay locally prevailing wage on federally funded construction projects.
- ❑ All laborers and mechanics employed by contractors, subcontractors, or vendors.
- ❑ Pay weekly and submit certified payroll records to funding agency.
- ❑ Must post wage rate determination and Davis-Bacon poster (WH-1321) on the job site for workers to see.
- ❑ Conduct employee interviews and spot checks.

Additional Documentation

- Authorization For Payroll Deductions
 - ▣ Any form that shows the benefits being deducted from the employees pay and their signature showing approval
 - ▣ Submit first time laborer has time or if any thing changes.
- Summary of Employer Benefits
 - ▣ Statement submitted with first payroll describing employer-provided fringe benefits or included on page 2 of Form 347
- Apprentice Certification
 - ▣ Copy of approved apprentice program including dispatch form if from union or any documentation showing approved program and rates.

Prevailing Wage

- Department of Labor issues the wage determination for different classifications of laborers and mechanics.
- Prevailing wage = basic hourly rate + fringe listed in Davis-Bacon wage determination
- Must be paid for all hours worked on job site
 - ▣ Does not apply to: Supervisory positions at the job-site
 - ▣ Design engineers
 - ▣ Clerical staff and inspectors

Wage Determinations

- ❑ Based on:
 - ❑ County where activity will take place
 - ❑ Type of construction
 - ❑ Labor classification
- ❑ Wage determinations must be incorporated into bid solicitations to ensure correct wage determination
- ❑ Found at:
www.wdol.gov



Wage Determinations

- ❑ Select state and county and construction type (if known)

General Decision Number: KS100011 04/08/2011 KS11
Superseded General Decision Number: KS20080011
State: Kansas
Construction Type: Building
County: Douglas County in Kansas.
BUILDING CONSTRUCTION PROJECTS (does not include residential construction consisting of single family homes and apartments up to and including 4 stories)

	Rates	Fringes
BOILERMAKER.....	\$ 32.31	21.66

BRKS0003-002 04/01/2009

	Rates	Fringes
BRICKLAYER.....	\$ 25.41	8.05

CARP0311-008 04/01/2009

Wage Determinations

- ❑ If labor classification isn't listed on specific wage determination for your area/construction type, must submit to funding agency to request additional.
- ❑ Federal agency has to submit Request For Wage Determination and Response to Request” form to Department of Labor
- ❑ DBRA Standard Form (SF) 308

<http://www.dol.gov/whd/programs/dbra/docs/sf308x.pdf>

Recordkeeping

- Contractors must maintain payroll and basic records for all laborers and mechanics during the course of the work and for 3 years thereafter. Records include:
 - ▣ Name, address, SSN of each employee
 - ▣ Work classification of each employee
 - ▣ Hourly rates of pay including fringe
 - ▣ Daily and weekly numbers of hours worked
 - ▣ Deductions made
 - ▣ Actual wages paid

Reporting

- ❑ Submit weekly copy of all payroll documents providing the details for the preceding weekly payroll period
- ❑ Certified payroll doesn't have to be original but must have access to the original.
- ❑ Each payroll record must include a “Statement of Compliance” signed by authorized officer
 - ▣ Form WH-347

Most Common Problems

- ❑ Misclassification of laborers and mechanics
- ❑ Failure to pay full prevailing wage, including fringe, for all ours worked (including overtime)
- ❑ Inadequate recordkeeping
- ❑ Failure to submit certified payrolls on a weekly basis
- ❑ Failure to post Davis-Bacon poster and wage determination on-site

Penalties

- Subject to contract termination and debarment from future contracts for up to 3 years
- Contract payments may be withheld in amounts to satisfy liabilities for unpaid wages and liquidated damages
- Falsification of payroll records may subject contractor to civil or criminal prosecution, which may be fines or imprisonment

Buy American Act

- History and Overview
- Compliance with Buy American
- Common Problems

Definitions

Iron or steel produced in the US

- Requires that all manufacturing process must take place in the US, except metallurgical processes involving refinement of steel additives. These requirements do not apply to iron or steel used as minor components or subcomponents of manufactured goods used in a project.

Manufactured Good – a good brought to the construction site for incorporation into the building or work that has been:

- 1) Processed into a specific form or shape
- 2) Combined with other raw material to create a material that has different properties than the properties of the individual raw materials

2 C.F.R. 176.160 defines a domestic manufactured good as “a manufactured good that consists in whole or in part of materials from another country, has been substantially transformed in the United States into a new and different manufactured good distinct from the materials from which it was transformed.

*There is no requirement with regard to the origin of components or subcomponents in manufactured goods used in the project, as long as the manufacturing occurs in the U.S.

Substantial Transformation



Appendix F: Determining Substantial Transformation

Questions for Determining Whether Substantial Transformation Has Occurred In the U.S.:

Question	Yes	No
1. Were all of the components of the manufactured good manufactured in the United States, and were all of the components assembled into the final product in the U.S.? (If the answer is yes, then this is clearly manufactured in the U.S., and the inquiry is complete)		
2. Was there a change in character or use of the good or the components in America? (These questions are asked about the finished good as a whole, not about each individual component)		
a. Was there a change in the physical and/or chemical properties or characteristics designed to alter the functionality of the good?		
b. Did the manufacturing or processing operation result in a change of a product(s) with one use into a product with a different use?		
c. Did the manufacturing or processing operation result in the narrowing of the range of possible uses of a multi-use product?		
3. Was (/were) the process(es) performed in the U.S. (including but not limited to assembly) complex and meaningful?		
a. Did the process(es) take a substantial amount of time?		
b. Was (/were) the process(es) costly?		
c. Did the process(es) require particular high level skills?		
d. Did the process(es) require a number of different operations?		
e. Was substantial value added in the process(es)?		

- If the answer to Question 1 is yes, then the item is clearly manufactured in the U.S., and the inquiry is complete.
- If the answer is yes for any of 2a, 2b, or 2c, then answer to Question 2 is yes.
- If the answer is yes for at least two of 3a, 3b, 3c, 3d, or 3e, then the answer to Question 3 is yes.

If the answer is "yes" to any of Questions 1, 2 or 3, then "substantial transformation" occurred in the United States.

Exceptions to Buy American

- ❑ Non-availability - if the iron, steel, or relevant manufactured goods are not produced in the US in sufficient and reasonably available quantities and of a satisfactory quality
- ❑ Unreasonable cost – if use of domestically produced iron, steel, or manufactured goods would increase the overall project cost by more than 25%
- ❑ Public interest – if application of the domestic preference provision is inconsistent with public interest

Must receive a waiver from the granting agency if not following Buy American for any reason!

Waivers

- ❑ Waivers from one agency, do not apply for another agency.
- ❑ DOE has several approved waivers on their website for items such as life safety systems and de minimis items.
- ❑ NIST trying to get these same waivers approved but not yet official.
- ❑ Unsure of status of waivers with other agencies.
- ❑ Expect 6 months or more to get waivers approved so plan ahead!

Common Problems

- ❑ Definition of “American” – includes the 50 states, District of Columbia and U.S. territories and outlying areas. Does NOT include countries with a treaty with the United States. Prior Buy American acts allowed purchases from countries with treaties.
- ❑ Definition of manufactured or “substantially transformed”.
- ❑ Waivers not being received therefore holding up work.
- ❑ On site finding stickers that say Made in xxx on a piece that is inside a manufactured part.
- ❑ Non America made parts on site but not being put into the building.

What if?

- A non American made product is installed in the building?
 - ▣ The agencies reserve the right to require the item be removed at the cost to the grant recipient.
 - ▣ Contact the agency to report issue.
 - ▣ Depending on the severity of the noncompliance, enforcement action may include termination of the award, debarment proceeding in accordance with 2 C.F.R. part 180 and reporting of fraudulent actions to the Department of Commerce Office of the Inspector General for criminal investigation.

Buy Americanu vs. Buy America

- ARRA grants subject to Buy American
- Section 165 (49 U.S.C. § 5323j), called the "Buy America" provision or Buy America Act applies to mass-transit-related procurements.
 - It established requirements intended to give preference to the use of domestically produced materials on any procurements funded at least in part by federal funds.
 - Implementation of the requirements is regulated by the Federal Transit Administration.

Other terms you may hear:

1. NEPA (National Environmental Policy Act)

Requirement that an environmental analysis be completed identifying any impact the award will have on the quality of the human environment.

2. Security Interest (Federal Interest)

Written statement from a licensed attorney in the jurisdiction where the property is located certifying that the federal interest has been protected as required under the award and in accordance with local law. We may not dispose of, modify the use of or change the terms of the real property title or interest in the project site and facilities without permission of the Grants Officer.

Essentially, you can't sell or mortgage the building for 20 years without agency permission. This includes the rights-of-way and easements – access to the building.

More terms you may hear:

3. Copeland “Anti-kickback” Act – prohibits contractors from inducing an employee to give up any part of the compensation in which they are entitled.
4. The Contract Work Hours and Safety Standards Act (CWHSSA) – requires overtime payment for working over 40 hours a week. Applies to contracts for construction or services in excess of \$100,000 are covered by CWHSSA.
5. Fraud Training – required to be completed by all people involved in the ARRA project. Must document that the training has occurred and when. Can be done on line or as a group.

At the University of Kansas



At the University of Kansas

- ❑ Research and Sponsored Projects are handled through the University of Kansas Center for Research, Inc. (KUCR)
- ❑ KUCR responsible for standard ARRA 1512 Reports
- ❑ Construction is handled through Design Construction Management
- ❑ DCM responsible to oversee planning, development and management of all construction and renovation projects on campus regardless of funding source or campus entity (i.e. KUEA, University, KUCR, etc).

At the University of Kansas

- **NIST** Measurement, Materials and Sustainable Environment Center (M2SEC)
 - New Engineering building
\$12,275,527 NIST funding
+ 6,500,000 required cost share
\$18,775,527
- **NSF** ARI-R2: Repair and Renovation: Advancing Research in Biodiversity Science
 - Renovation of Natural History Museum/Dyche Hall
\$1,512,426 (no required cost share)
- **NIH**: Bioinformatics Computing Facility Core Renovation and Improvement
 - Renovation of core computer engineering facility/Nichols Hall
\$4,657,861 (no required cost share)

NIST (National Institute of Science & Technology)

- Governing terms & conditions:
 - ▣ NIST Federal Financial Assistance Special Award Conditions
 - ▣ U.S. Department of Commerce ARRA Award Terms
 - ▣ Department of Commerce Financial Assistance Standard Terms & Conditions
 - ▣ NIST Construction Grant Program General Terms and Conditions
 - ▣ Clarifying Guidance for NIST ARRA Construction Grant Reporting
 - ▣ NIST Construction Grants Supplemental Buy American Guidance (SBAG)

- Program officer heavily involved in all steps

NIST – Davis-Bacon

- Architect/Engineer selected for project is contracted to provide oversight and administrative services related to DBA reporting.
- The Contract Manager submits all payroll reports/records to the A/E on a weekly basis (uploaded to Submittal Exchange).
- A/E performs on-site inspections and employee interviews on a monthly basis

On-site Visit summary form we created for NIST project

- Record date and time
- Confirm appropriate signage is posted
- Interview workers (we shoot for 5% of the workers on-site at that time)
- Always check in with site supervisor






Site Visit Summary
NIST - M2SEC Building
University of Kansas

Date of Site Visit: _____ Time of Day: _____

Site Visit done by: _____, Treanor Architects.

Signage:
Was the following information posted at the construction job-site?

Yes <input type="checkbox"/>	No <input type="checkbox"/>	Wage Rate	Yes <input type="checkbox"/>	No <input type="checkbox"/>	Recovery.gov emblem
<input type="checkbox"/>	<input type="checkbox"/>	Davis Bacon Act poster (English and Spanish)	<input type="checkbox"/>	<input type="checkbox"/>	Dept. of Commerce emblem
<input type="checkbox"/>	<input type="checkbox"/>	Fraud prevention number & information	<input type="checkbox"/>	<input type="checkbox"/>	NIST emblem

☐ ☐ Was all information prominent, protected and accessible?

Interviews:
The following people were interviewed and the Labor Standards Interview form is attached for each.

	Name of Employee	Job Classification	Name of Employer
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			

(If additional people interviewed, continue on a separate page)

I certify that the above information to be correct and accurate and I certify that the attached information provides accurately reflects on-site interviews that were conducted in accordance with _____.

Signature: _____ Date: _____

Standard Form 1445

Individual interview
forms used during
on-site visits for
NIST project

LABOR STANDARDS INTERVIEW									
CONTRACT NUMBER					EMPLOYEE INFORMATION				
NAME OF PRIOR CONTRACTOR					LAST NAME		FIRST NAME		MI
					STREET ADDRESS				
NAME OF EMPLOYER					CITY		STATE	ZIP CODE	
SUPERVISOR'S NAME					CITY		STATE	ZIP CODE	
LAST NAME		FIRST NAME		MI	WORK CLASSIFICATION			WAGE RATE	
ACTION								CHECK BELOW	
								YES	NO
Do you work over 8 hours per day?									
Do you work over 40 hours per week?									
Are you paid at least time and a half for overtime hours?									
Are you receiving any cash payments for fringe benefits required by the posted wage determination decision?									
WHAT DEDUCTIONS OTHER THAN TAXES AND SOCIAL SECURITY ARE MADE FROM YOUR PAY?									
HOW MANY HOURS DID YOU WORK ON YOUR LAST WORK DAY BEFORE THIS INTERVIEW?					TOOLS YOU USE				
DATE OF LAST WORK DAY BEFORE INTERVIEW (YYYYMMDD)									
DATE YOU BEGAN WORK ON THIS PROJECT (YYYYMMDD)									
THE ABOVE IS CORRECT TO THE BEST OF MY KNOWLEDGE									
EMPLOYEE'S SIGNATURE								DATE (YYYYMMDD)	
INTERVIEWER		SIGNATURE			TYPED OR PRINTED NAME			DATE (YYYYMMDD)	
INTERVIEWER'S COMMENTS									
WORK EMPLOYEE WAS DONE WHEN INTERVIEWED					ACTION (If explanation is needed, use comments section)				
					YES				
					NO				
					IS EMPLOYEE PROPERLY CLASSIFIED AND PAID?				
					YES				
					NO				
					ARE WAGE RATES AND POSTERS DISPLAYED?				
					YES				
					NO				
FOR USE BY PAYROLL CHECKER									
IS ABOVE INFORMATION IN AGREEMENT WITH PAYROLL DATA?									
<input type="checkbox"/> YES <input type="checkbox"/> NO									
COMMENTS									
CHECKER									
LAST NAME		FIRST NAME		MI	JOB TITLE			DATE (YYYYMMDD)	
SIGNATURE									
STANDARD FORM 1445 (Rev. 12-94) Prescribed by GSA - FPMR (41 CFR) 101-11.6									

NIST – Davis-Bacon

- A/E reviews all payroll records. If discrepancies are found, notify CM to correct
- A/E will submit a copy of all supporting documentation, final approvals and certifications to DCM – who is the repository for formal documentation on behalf of KUCR and the university.
- In the case of NIST, the certifications are not actually sent to the agency, but are retained in our records for formal documentation...when they do come asking for it.

- Buy American:

- ▣ Section 1605 of the Recovery Act

“None of the funds appropriated or otherwise made available by the Recovery Act may be used for a project for the construction, alteration, maintenance, or repair of a public building or public work unless all of the iron, steel, and manufactured goods used in the project are produced in the US.”

NIST – Buy American

□ Buy American:

NIST released Supplemental Buy American Guidance for NIST Construction Grants.

- ▣ Terms and conditions had to be outlined in all bid documents, purchase orders, and contracts.
- ▣ CM and all subcontractors are required to provide documentation of Buy America at time of submission of each invoice.
- ▣ Documentation is reviewed by A/E and invoice may be rejected if sufficient documentation is not available. CM can resubmit any invoice with appropriate detail.
- ▣ Official documentation is retained at DCM and will be accessible when needed.

NSF renovation

- Governing terms and conditions:
- NSF-specific ARRA Terms & Conditions
http://www.nsf.gov/publications/pub_summ.jsp?ods_key=arra-0509
- Academic Research Infrastructure – Recovery and Reinvestment (ARI-R2) Program Terms & Conditions dated June 2010
http://www.nsf.gov/publications/pub_summ.jsp?ods_key=arir2

NSF renovation

□ Davis Bacon:

- ▣ *“The Awardee shall submit semi-annually via the NSF Fastlane system’s Interim Report function, a copy of all weekly payrolls. A signed Statement of Compliance indicating that the payrolls are correct and complete and that each laborer or mechanic has been paid not less than the proper Davis Bacon Act prevailing wage rate for the work performed under this award, must be included in the submission.”*
- ▣ If the project has not yet hired laborers or mechanics at the reporting date, a negative report must be filed certifying, *“in the previously six months, no laborer or mechanic has worked on this project.”*

NIH renovation

- Governing terms and conditions:

- ▣ NIH Grants Policy Statement

- ▣ HHS-approved Standard Terms and Conditions for the American Recovery and Reinvestment Act of 2009

- http://grants.nih.gov/grants/policy/NIH_HHS_ARRA_Award_Terms.pdf

NIH

- Funds (except allowable design costs) are restricted and only released through issuance of revised Notice of Award as negotiated milestones are met and required approvals are obtained.
- Davis-Bacon specifically mentioned in HHS specific terms, but not Buy American.

At the University of Nebraska-Lincoln



At the University of Nebraska – Lincoln

- Research and Sponsored Projects are handled through the Office of Sponsored Programs.
 - Responsible for filing reports.
 - Submits for reimbursement of funds.

- Construction is handled through Facilities Management and Planning department
 - Responsible for preparing the contents of the information for the reports.
 - Oversee planning, development and management of all construction and renovation projects

At the University of Nebraska – Lincoln

□ **NIH:**

- ▣ Building addition
- ▣ Federal Funds \$8,000,000 – No matching required

□ **NIST:**

- ▣ Completion of basement and building addition
- ▣ Federal Funds \$6,904,993 Total Project \$14,847,000

□ **NSF:**

- ▣ Renovation of Laser Lab
- ▣ Federal Funds \$1,825,345 Total Project \$2,049,000
 - No matching required but NSF wouldn't fund internal labor therefore using funds from an Air Force grant to pay these costs

□ **NEO/DOE – Nebraska Department of Energy through the Department Of Energy:**

- ▣ 6 separate awards dealing with occupancy sensors, fume hood replacement, lighting upgrades, duct system improvements, and construction of a biomass facility
- ▣ Federal Funds \$1,362,000 Total Project \$3,428,500

Buy American

- ❑ Negative Certification Form
 - ▣ Received if all the products that vendor makes are Made in America – notes any exceptions
- ❑ Positive Certification Form
 - ▣ Lists the products that are Made in America
- ❑ Vendor Certification Form
 - ▣ Required for all vendor invoices that are charging materials in addition to labor

Employee Interview Questions

Davis Bacon Employee Interview Questions

Project Name: _____

Project Number: _____ ID#: _____

Contractor or Subcontractor (Employer): _____

Name of Employee: _____

Personal Telephone Number _____

Personal Street Address _____ City _____ State _____ Zip Code _____

Employee Interview:

1. Your Work Classification: _____

2. Your Regular Hourly Rate of Pay: _____

3. Deductions Other Than Taxes and Social Security Made From Your Pay: _____

4. Employer Paid Fringe: _____

5. Your Duties: _____

6. Tools or Equipment Used: _____

7. Paid at Least Time and One-half for All Hours Worked in Excess? ____ Yes ____ No

8. Ever Threatened, Intimidated, or Coerced into Giving up Any Part of Your Pay? ____ Yes ____ No

9. Do you know where to find the U.S. Department of Labor Wage Determination and Davis Bacon Employee Rights Poster on the job site? ____ Yes ____ No

Comments by Employee: _____

Signature of Employee: _____ Date: _____

Desk Top Monitoring After Interview:

Verification from Payroll Week Ending: _____

Total Regular Hours Worked / Total Overtime Hours Worked: _____

Rate of Pay for Regular Hours / Rate of Pay for Overtime Hours: _____

Does Information Comply with the Davis Bacon Wage Rate? ____ Yes ____ No

If No, Explain: _____

Signature of Interviewer: _____ Date: _____

Reporting

Standard forms required for all ARRA projects

- ▣ ARRA 1512 Reports

- Quarterly Jobs retained/created
- Sub Recipient vendor list

- ▣ Normal reports required by the specific agency on any other grant through that agency

Other Reporting and Budget

- NIST
 - ▣ Federal Financial Reporting (Form 425)
 - ▣ Performance Progress Report (Form SF-PPR)
 - ▣ Updated schedules of projects as prepared by General Contractor
 - ▣ Submit any changes over 10% of the award.
- NEO/DOE
 - ▣ Submit ALL changes to budget regardless of value or funding source.
 - ▣ Requires copies of all invoices when requesting reimbursement.
 - ▣ Originals of all DBA documents submitted periodically (no less than monthly).
- NIH
 - ▣ Waiting on clarification of expectation for budget adjustments.
 - ▣ Approval of phase to get reimbursement. Approval of Design and Contractor documents.
- NSF
 - ▣ Submit any changes to budget regardless of value for NSF funds.
 - ▣ Approval of all vendor contracts before service is performed.
 - ▣ Copy of all weekly payrolls through Fastlane semi-annually.

Communication

- NIST - Conference call every 5 weeks and e-mail
- NSF - Project manager can e-mail NSF but everything has to be submitted through Fastlane
- NIH – E-mail
- NEO/DOE – E-mail or call

Open Discussion

- ❑ What experiences has your University had with ARRA projects?
- ❑ Any other agencies that have given ARRA funding and other regulations?
- ❑ Other questions/comments?

Final Take-Aways

- Keep in mind that each federal agency may and will likely interpret these rules differently. Always review your award documents and work with the funding agency.
- Reporting requirements must be listed in all bid solicitations and flowed down in contracts. Contractors submitting bids must know the specific requirements to be placed upon them should they be selected.

Helpful websites:

- ❑ DOL Davis-Bacon and Related Acts Homepage:
www.dol.gov/esa/programs/dbra/index.htm
- ❑ DOL wage decisions: www.dol.gov
- ❑ Buy America Title 2 Grants and Agreements:
http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&tpl=/ecfrbrowse/Title02/2cfr176_main_02.tpl
- ❑ Fraud Prevention Training:
<http://www.oig.doc.gov/Pages/OIGSearchResults.aspx?k=fraud%20training&cs=This%20Site&u=http%3A%2F%2Fwww.oig.doc.gov>

Contact Us

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