

OFCCP/PTAC

Construction Workshop

Anchorage, AK

April 11, 2007

Standard Compliance Review Report

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- Cover Page
- Contractor Information
- SMSA
- Period Covered
- Additional Information

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2. List all contractor's construction projects, regardless of whether they are Federal, federally assisted, or non-federally related, which were under way in the covered area during the review period.

Covered Projects	Funding Agency (If Federal \$)	Amount (If Federal \$)	Date of Award (If Federal \$)
Barracks Renovation – Ft. Richardson	US Corps of Engineers	\$5,214,000.00	Jul. 6, 2006
Anchorage New Federal Bldg. Renovation	GSA	\$750,000.00	Sept. 20, 2006
Learn More Middle School			
Pay More Department Store			

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3. Summarize contractor's actual hours as obtained from payroll records.													
Covered Crafts	Year Goals		Work Hours							Hours as a % of Total		Met All Goals	
												Yes	No
			Total	Minority					Fem.				
	M	F		1	2	3	4	5		M	F		
Carpenters	8.7%	6.9%	1,000	250	0	100	150	0	70	25.0	7.0	M/F	
Masons	8.7%	6.9%	12,000	0					0	0	0		M/F
Operators	8.7%	6.9%	5,676	0					0	0	0		M/F
Roofers	8.7%	6.9%	3,213	76	76	0	0	0	0	2.4	0		M/F
Laborers	8.7%	6.9%	23,432	2,460					480	10.5	2.0	M	F
1 – Total Minority				4 – Amer. Ind. & Alaska Native									
2 – Black (Not of Hispanic Origin)				5 – Asian or Pacific Islander									
3 - Hispanic													

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II. Review of Records

A. Utilization Verification: Select 6 months, and complete the following work-hour verification from contractor's payrolls.

5. Month July

Year 2006

Actual Hours of Utilization from Payroll

Craft	Goal		Total	Minority		Female	
	M	F		#	%	#	%
Carpenters	8.7%	6.9%	233	50	21.5%	10	4.3%
Masons	8.7%	6.9%	899	0	0.0%	0	0.0%
Operators	8.7%	6.9%	430	0	0.0%	0	0.0%
Roofers	8.7%	6.9%	75	25	33.3%	0	0.0%
Laborers	8.7%	6.9%	2,500	95	3.8%	200	8.0%

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B. Employee Utilization (Determine through payroll review and supervisor/employee interviews).

- 1. Are any of the contractor's employees members of a union?**
- 2. If yes, indicate by trade the name of the union and the local number.**
- 3. Show total overtime hours worked by minorities and women by trade.**
- 4. Is overtime work in each trade distributed equitably among all employees?**
- 5. Is the contractor engaged in both residential and commercial construction?**
 - (a) If yes, are there wage differentials between the two types of construction?**
 - (b) Are minorities and women assigned to both types of projects?**

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6. Show number of hours worked on each type of project by minorities and women.

	<u>Commercial</u>	<u>Residential</u>
Minorities	_____	_____
Women	_____	_____

7. Show total number of hours worked on each type of project.

Commercial _____ Residential _____

8. Do the payroll records and employee interviews reflect substantially consistent utilization of minorities and women throughout the length of the review period and on ALL the contractor's work (federally involved and non-federally involved)?

C. Summary (Summarize finding for Sections IIA and IIB. Indicate whether contractor is deficient.)

III. Audit of Affirmative Action Specifications
(41 CFR 60-4.3 (a)7.a. – p.)

A. Audit of Recruitment Practices SCRR Pg. 13	
Specification	Explain what actions, if any, were taken to comply with the specification/ obligation. Were the contractor's actions deficient, if yes, explain.
<p>1. Has the contractor established and maintained a current list of minority and women's recruitment sources, provided written notification to these recruitment sources and to community organizations when it or its unions had opportunities available, and maintained a record of the organizations' responses?</p> <p style="text-align: center;">(41 CFR 60-4.3(a) 7.b.)</p>	<p>TA Manual</p> <p>Page 11</p>
<p>2. Has the contractor maintained a file of the name, address, and telephone number of each minority and female walk-in applicant and minority-group person or woman referred from a union, recruitment sources, or community organizations, and the action taken with respect to each individual? If such individual was sent to the union hiring hall for referral and was not referred back to the contractor by the union, or if referred, was not employed by the contractor, this will be documented in the file with the reason therefore, along with what ever additional actions the contractor may have taken.</p> <p style="text-align: center;">(41 CFR 60-4.3(a) 7.c.)</p>	<p>TA Manual</p> <p>Page 12</p>

A. Audit of Recruitment Practices (Continued)

SCRR Pg. 14

Specification	Explain what actions, if any, were taken to comply with the specification/ obligation. Were the contractor's actions deficient, if yes, explain.
<p>3. Has the contractor provided immediate written notification to OFCCP when the union or unions with which it has collective bargaining agreements did not refer to the contractor members of minority groups or women, or when the contractor had other information that the union referral process impeded the contractor's efforts to meet its obligations?</p> <p>(41 CFR 60-4.3(a) 7.d.)</p>	<p>TA Manual</p> <p>Page 13</p>
<p>4. Has the contractor directed its recruitment efforts, both oral and written, to minority, women's, and community organizations, to schools with minority and women students serving the contractor's recruitment area employment needs: Not later than one month before the date for the acceptance of applications for apprenticeship or other training by any recruitment sources, the contractor should have sent written notification to organizations such as the above, describing the openings, screening procedures and tests to be used in the selection process.</p> <p>(41 CFR 60-4.3(a) 7.i.)</p>	<p>TA Manual</p> <p>Page 18</p>

A. Audit of Recruitment Practices (Continued)

SCRR Pg. 15

Specification	Explain what actions, if any, were taken to comply with the specification/ obligation. Were the contractor's actions deficient, if yes, explain.
<p>5. Has the contractor encouraged present minority and female employees to recruit other minorities and women? Where reasonable, did the contractor provide after-school, summer, and vacation employment to minority and female youth both onsite and in other areas of a contractor's workforce?</p> <p>(41 CFR 60-4.3(a) 7.j.)</p>	<p>TA Manual</p> <p>Page 19</p>

B. Audit of Training

<p>1. Has the contractor developed on-the-job training opportunities or participated in training programs for the area that expressly include members of minority groups and women (including upgrading programs and apprenticeship and trainee programs relevant to the contractor's employment needs), especially those programs funded or approved by the Department of Labor? The contractor should have provided notice of these programs to the recruitment sources compiled under item A.1 above.</p> <p>(41 CFR 60-4.3(a) 7.e.)</p>	<p>TA Manual</p> <p>Page 14</p>
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C. Audit of EEO Policy and Implementation
SCRR Pg. 16

Specification	Explain what actions, if any, were taken to comply with the specification/ obligation. Were the contractor's actions deficient, if yes, explain.
<p>1. Has the contractor disseminated its EEO policy by providing notice of the policy to unions and training programs and requesting their cooperation in assisting the contractor in meeting its EEO obligations; by including it in any policy manual and collective bargaining agreement; by publicizing it in the company newspaper, annual report, etc; by specific review of the policy with all management personnel and with all minority and women employees at least once a year; and by posting the company's EEO on bulletin boards accessible to all employees at each location where construction work is performed. (41 CFR 60-4.3(a) 7.f.)</p>	<p>TA Manual Page 15</p>
<p>2. Has the contractor reviewed, at least annually, the company's EEO policy and affirmative action obligations under these specifications with all employees having any responsibility for hiring, assignment, layoff, termination, or other employment decisions, including specific review of these items with onsite supervisory personnel prior to the initiation of construction work on any site? A written record should have been made and maintained identifying the time and place of these meetings, persons attending, subject matter discussed, and disposition of the subject matter. (41 CFR 60-4.3(a) 7.g.)</p>	<p>TA Manual Page 16</p>

C. Audit of EEO Policy and Implementation (Continuation)

SCRR Pg. 17

Specification	Explain what actions, if any, were taken to comply with the specification/ obligation. Were the contractor's actions deficient, if yes, explain.
3. Has the contractor disseminated its EEO policy externally by including it in any advertising in the news media, specifically including minority and women's news media, and providing written notification to and discussing the contractor's EEO policy with other contractors and subcontractors with whom the contractor did or anticipated doing business. (41 CFR 60-4.3(a) 7.h.)	TA Manual Page 17
4. Has the contractor conducted, at least annually, an inventory and evaluation of all minority and female personnel for promotional opportunities, and encouraged these employees to seek or to prepare, for, through appropriate training, for such opportunities? (41 CFR 60-4.3(a) 7.i.)	TA Manual Page 21
5. Has the contractor conducted a review, at least annually, of all supervisors' adherence to and performance under the contractor's EEO policies and affirmative action obligations? (41 CFR 60-4.3(a) 7.p.)	TA Manual Page 25

**D. Audit of Personnel Operations
SCRR Pg. 18**

Specification	Explain what actions, if any, were taken to comply with the specification/ obligation. Were the contractor's actions deficient, if yes, explain.
<p>1. Has the contractor ensured and maintained a working environment free of harassment, intimidation, and coercion at all sites and in all facilities at which the contractor's employees are assigned to work? The contractor, where possible, should have assigned two or more women to each construction project. The contractor should have specifically ensured that all supervisory personnel were aware of and carried out the contractor's obligation to maintain such a working environment, with specific attention to members of minority or women groups working at such sites or in such facilities.</p> <p style="text-align: center;">(41 CFR 60-4.3(a) 7.a.)</p>	<p style="text-align: center;">TA Manual Page 9</p>
<p>2. Has the contractor maintained all required information and validated all tests and other selection requirements where there is an obligation to do so under 41 CFR Part 60-3.</p> <p style="text-align: center;">(41 CFR 60-4.3(a) 7.k.)</p>	<p style="text-align: center;">TA Manual Page 20</p>

D. Audit of Personnel Operations (Continuation)

SCRR Pg. 19

Specification	Explain what actions, if any, were taken to comply with the specification/ obligation. Were the contractor's actions deficient, if yes, explain.
<p>3. Has the contractor ensured that seniority practices, job classifications, work assignments and other personnel practices had no discriminatory effect, and has it continually monitored all related personnel employment activities to ensure that the EEO policy and the contractor's obligations under these specifications were being carried out?</p> <p>(41 CFR 60-4.3(a) 7.m.)</p>	<p>TA Manual</p> <p>Page 22</p>
<p>4. Has the contractor ensured that all facilities and company activities were non-segregated, except for providing separate or single-user toilet and necessary changing facilities to assure privacy between the sexes.</p> <p>(41 CFR 60-4.3(a) 7.n.)</p>	<p>TA Manual</p> <p>Page 23</p>

**E. Audit of Contracting Activities
SCRR Pg. 20**

Specification

Explain what actions, if any, were taken to comply with the specification/ obligation. Were the contractor's actions deficient, if yes, explain.

1. Has the contractor documented and maintained a record of all solicitations of offers for subcontracts from minority and female construction contractors and suppliers, including circulation of solicitations to minority and female contractor associations and other business associations?

(41 CFR 60-4.3(a) 7.o.)

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F. Sex Discrimination Guidelines

Has the contractor complied with 41 CFR Part 60-20, Sex Discrimination Guidelines.

**G. Religion/National Origin Discrimination
SCRR Pg. 21**

Specification

Explain what actions, if any, were taken to comply with the specification/obligation. Were the contractor's actions deficient, if yes, explain.

1. Has the contractor complied with 41 CFR Part 60-50, Religion/National Origin Discrimination Guidelines.

H. Section 503/38 USC 4212 (Federal Contractors/subcontractors)

Has the contractor complied with 41 CFR Part 60-250 and 60-741, affirmative action obligations of contractors and subcontractors for special disabled veterans and veterans of the Vietnam era; and for individuals with disabilities?

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IV. Physical Inspection of Contractor's Work Sites

A. List work sites visited and indicate whether they were Federal, federally assisted, or non-federally involved projects.

Project name and Location

Funding

B. Summarize results of interviews.

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V. Narrative Summary

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1. Status (Check appropriate items)

a. In compliance with goals in all covered crafts (Check if yes)

Minority

Female

b. _____ In compliance with all affirmative action specifications. (Check if yes)

c. _____ Noncompliance

i. _____ Conciliation Agreement

ii. _____ Show Cause Notice

2. Date Review Completed _____.

3. Hours to Complete Review

4. Signatures.