



# CDBG-DR Davis-Bacon and Related Acts Policy

**NEW MEXICO HOME RECOVERY PROGRAM  
DEPARTMENT OF HOMELAND SECURITY AND  
EMERGENCY MANAGEMENT**

This policy is effective as of 3/20/2026 and may be updated periodically to reflect program implementation and evolving guidance from the U.S. Department of Housing and Urban Development (HUD).

<b>Version</b>	<b>Date</b>	<b>Summary Description</b>
1.0	03/20/2026	Initial Publication



## Table of Contents

I. PURPOSE AND SCOPE.....	1
II. BACKGROUND .....	1
III. POLICY STATEMENT .....	2
IV. DEFINITIONS.....	2
V. PROCEDURES.....	4
VI. SCOPE OF WORK AND EVALUATION CRITERIA.....	6
A. Applicability of Davis-Bacon Requirements .....	6
1. Thresholds for Applicability .....	6
2. Types of Projects Covered .....	7
3. Exemptions and Limitations .....	7
4. Interaction with New Mexico State Law .....	8
5. CDBG-DR Program-Specific Considerations .....	8
B. Pre-Construction Phase.....	8
1. Wage Determination .....	8
2. Bid and Contract Requirements .....	9
3. Contractor Eligibility Verification .....	10
4. Pre-Construction Conferences .....	10
5. Project Labor Compliance Files.....	10
C. Construction Phase.....	11
1. Certified Payroll Reports .....	11
2. Payroll Review and Compliance Verification .....	11
3. On-Site Monitoring and Worker Interviews .....	12
4. Job Site Requirements.....	12
5. Handling Noncompliance Restitution.....	13
6. Subcontractor Oversight .....	13
7. Continuous Documentation and Audit Preparedness .....	13
D. Post-Construction Phase .....	14
1. Final Payroll Review and Closeout Verification .....	14
2. Final Wage Compliance Report.....	14



3. Restitution Documentation .....	15
4. Contractor Performance Evaluation and Debarment Review .....	15
E. Training and Technical Assistance .....	15
1. DHSEM Training Program .....	15
F. Monitoring and Continuous Improvement.....	17
G. Reporting.....	19
VII. ROLES AND RESPONSIBILITIES .....	19
VIII. COMPLIANCE & ENFORCEMENT .....	23
A. Noncompliance and Violation Types.....	23
B. Corrective Action Process.....	23
C. Payment Withholding .....	24
D. Debarment and Referral .....	24
E. State Enforcement through NMDWS .....	25
F. Documentation of Violations .....	25
IX. CONFLICTS OF INTEREST AND MODIFICATIONS.....	25
X. DOCUMENTATION & RECORDKEEPING .....	25
XI. REFERENCES .....	26
XII. APPENDICES .....	28
A. Appendix A: Required Federal Labor Standards Forms.....	28
B. Appendix B: Sample Compliance Tools and Templates .....	30



## I. PURPOSE AND SCOPE

Purpose: This Davis-Bacon and Related Acts (DBRA) Compliance Policy is established to ensure the State of New Mexico's full adherence to federal labor standards in connection with all construction activities funded through the Community Development Block Grant – Disaster Recovery (CDBG-DR) program under DR-4795 and DR-4843. The DBRA establishes federal labor standards for construction projects receiving federal funding, ensuring that workers are paid wages that reflect local prevailing rates as determined by the U.S. Department of Labor (DOL). In other words, the U.S. Department of Labor (DOL) sets Davis-Bacon wages and maintains them over time. The wage determinations are published online at [SAM.gov](http://SAM.gov). Each wage determination lists a base rate and a fringe rate to be paid for each worker classification.

The Office of Davis-Bacon and Labor Standards (DBLS) is responsible for HUD's overall compliance with the federal prevailing wage requirements applicable to HUD-funded programs. Title I of the Housing and Community Development Act of 1974 requires the payment of local prevailing wage rates (which are determined by the U.S. Department of Labor (DOL) to all workers on HUD-funded construction projects, which may include CDBG-DR and CDBG-MIT, (referred to as HUD-funded or HUD funds in this document) in excess of \$2,000 in contract value.

Scope: This policy applies to all CDBG-DR-funded construction activities administered by the Department of Homeland Security and Emergency Management (DHSEM) and its subrecipients, including public infrastructure, housing, and mitigation projects. The policy covers:

- New construction, rehabilitation, or demolition contracts exceeding \$2,000 and any contract financed as a whole or in part with CDBG-DR funds, regardless of whether it is federally or state-administered; except single-family housing projects with seven (7) or fewer units.
- Labor compliance monitoring, certified payroll requirements, on-site wage postings, and enforcement of penalties for noncompliance.

This document serves as the governing policy for all staff, contractors, and partners involved in implementing CDBG-DR programs in New Mexico, ensuring that labor protections are upheld, and that prevailing wage determinations are properly applied and enforced.

## II. BACKGROUND

The DBRA establishes federal labor standards for construction projects receiving federal funding (in whole or in part) in excess of \$2,000 in contract value. DBRA requirements ensure that laborers and mechanics working on such projects, receive at a minimum, local prevailing rates as determined by the U.S. Department of Labor (DOL) (pursuant § Title I of the HCDA of 1974). Prevailing wages include both the basic hourly rate and fringe benefits for each specific classification. Wage Determinations (WDs), which list each classification's prevailing wage, are published online at [sam.gov](http://sam.gov). The Office of Davis-Bacon and Labor Standards (DBLS), which falls under the U.S. Department of Housing and Urban Development (HUD), is responsible for overall



compliance with the federal prevailing wage requirements applicable to HUD-funded programs. CDBG-DR and CDBG-MIT, (referred to as HUD-funded or HUD funds in this document) may be subject to DBRA.

Exemptions: Residential projects with fewer than eight (8) units are exempt from DBRA requirements when CDBG funds are used for construction or rehabilitation. This applies to both new construction and rehabilitation, according to HUD guidance.

### III. POLICY STATEMENT

This document serves as the governing policy for all staff, contractors, and partners involved in implementing CDBG-DR programs in New Mexico, ensuring that labor protections are upheld, and that prevailing wage determinations are properly applied and enforced. The policy is designed to align with applicable federal regulations, including the Davis-Bacon Act of 1931, Section 110 of the Housing and Community Development Act of 1974, and Title 24 of the Code of Federal Regulations (CFR) Part 570, as well as relevant New Mexico labor laws and standards, including the Public Works Minimum Wage Act (NMSA 1978, §§ 13-4-10 to 13-4-17).

### IV. DEFINITIONS

Term	Definition
<b>Apprentice</b>	An individual registered in a bona fide apprenticeship program recognized by the U.S. Department of Labor or a State Apprenticeship Agency. Also includes probationary apprentices within the first 90 days of employment, if certified as eligible. (29 C.F.R. § 5.2(n)(1))
<b>Building or Work</b>	Refers to construction activity (not manufacturing or maintenance), including bridges, highways, railways, docks, plants, and similar infrastructure. (29 C.F.R. § 5.2(i))
<b>Business Owner</b>	An employee who owns at least 20% equity in the enterprise and is actively engaged in management. (29 C.F.R. § 541.101)
<b>CDBG-DR</b>	Community Development Block Grant – Disaster Recovery. A HUD-administered program to support long-term disaster recovery.
<b>Certified Payroll (WH-347)</b>	A weekly payroll submission certifying wage payments, including hours worked and job classifications, using Form WH-347 for DBRA compliance.



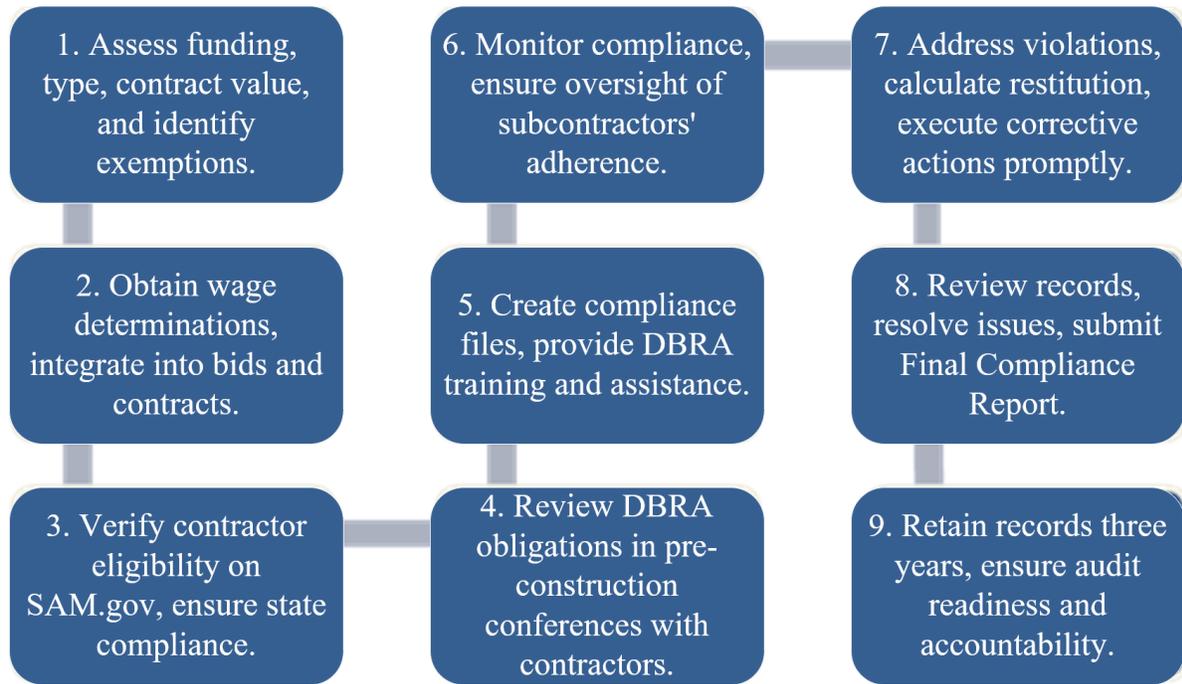
<b>Construction, Prosecution, Completion, or Repair</b>	All on-site work related to a project including alteration, transportation of materials, and furnishing of supplies by contractor employees. (29 C.F.R. § 5.2(j))
<b>Contract</b>	Any prime or sub-contract subject to labor standards under 29 C.F.R. § 5.1, including federally assisted projects requiring Davis-Bacon wage compliance. (29 C.F.R. § 5.2(h))
<b>Conformance Request (SF-1444)</b>	A formal request submitted to the Department of Labor to add a job classification not listed in the original applicable wage determination.
<b>Davis-Bacon Act</b>	A federal law mandating the payment of local prevailing wages on federally funded or assisted construction projects.
<b>Davis-Bacon and Related Acts (DBRA)</b>	A group of statutes that apply Davis-Bacon labor standards to federally assisted contracts involving construction, repair, or alteration of public works.
<b>DHSEM</b>	New Mexico Department of Homeland Security and Emergency Management. State agency administering CDBG-DR compliance, including DBRA administration and enforcement.
<b>DOL</b>	U.S. Department of Labor. Oversees wage determinations, labor compliance, and apprenticeship standards.
<b>Fringe Benefits</b>	Non-cash compensation such as health insurance, retirement contributions, or paid leave, which may be credited toward required prevailing wage payments. (29 C.F.R. § 5.2(p))
<b>Helper</b>	A labor classification distinct from others on the wage determination. Must be a recognized prevailing practice and not a trainee role. (29 C.F.R. § 5.2(n)(4))
<b>HUD</b>	U.S. Department of Housing and Urban Development. Administers CDBG-DR and related federal housing programs.
<b>HUD Handbook 1344.1 Rev-3</b>	A comprehensive guide to federal labor standards enforcement in HUD-assisted programs, including DBRA compliance protocols.
<b>Laborer or Mechanic</b>	Manual or physical workers covered by DBRA, including apprentices, trainees, and helpers, but excluding managerial or administrative roles. (29 C.F.R. § 5.2(m))



<b>Management</b>	Includes duties such as hiring, supervising, budgeting, procurement, and legal compliance—generally excluded from DBRA labor classifications. (29 C.F.R. § 541.102)
<b>Prevailing Wage</b>	The wage paid to a majority of workers in a given classification in a geographic area, as determined by DOL. (29 C.F.R. § 1.2(a)(1))
<b>Public Building / Public Work</b>	Any construction activity funded by a federal agency for public benefit, regardless of ownership. (29 C.F.R. § 5.2(k))
<b>Restitution</b>	Back wages paid to workers due to underpayment or misclassification under DBRA.
<b>Site of Work</b>	The location where a covered project is constructed, including adjacent areas specifically established for project activities. (29 C.F.R. § 5.2(l))
<b>Trainee</b>	An individual receiving on-the-job training in a DOL-approved program. (29 C.F.R. § 5.2(n)(2))
<b>Volunteer</b>	An unpaid individual performing work for charitable or civic reasons, not under coercion or as part of paid employment. (24 C.F.R. § 70.3(a))
<b>Wage Determination (WD)</b>	A DOL-issued schedule listing minimum wage and fringe benefit rates for labor classifications in a particular region and project type. (29 C.F.R. § 5.2(q))
<b>Wages</b>	Includes hourly pay plus eligible fringe benefits. Excludes employer contributions required by other laws (e.g., Social Security). (29 C.F.R. § 5.2(p))
<b>WH-1321</b>	The "Notice to All Employees" poster required to be displayed at federally funded construction sites.

## V. PROCEDURES

Below is a general flowchart illustrating the Davis-Bacon and Related Acts process:



Below is a detailed, step-by-step process for ensuring compliance with Davis-Bacon Labor Standards in the context of CDBG-DR programs.

Step	Process
1.0	<b>Assess Applicability and Review Exemptions:</b> Determine if Davis-Bacon requirements apply by checking federal funding involvement, project type, and contract value over \$2,000. Identify any exemptions, such as small residential projects or those purely funded by state/local funds.
2.0	<b>Obtain and Integrate Wage Determinations:</b> Acquire the relevant DOL General Wage Determination from SAM.gov prior to contract advertisement, ensuring alignment with local and project-specific construction types. Incorporate determinations and required labor provisions into all bid and contract documents.
3.0	<b>Conduct Pre-Construction Conferences:</b> Host meetings with contractors and subcontractors to review DBRA obligations, such as certified payroll submissions, posting requirements, at job sites, and compliance expectations.
4.0	<b>Verify Contractor and Subcontractor Eligibility:</b> Screen contractors and subcontractors on SAM.gov for debarment or suspension and verify compliance with state registration and licensing criteria before awarding contracts.



5.0	<b>Establish Project Compliance and Training Framework:</b> Create a comprehensive labor compliance file for each project, containing key documents like wage determinations, contracts, and training materials. Provide essential DBRA training and technical assistance to ensure thorough understanding by all involved parties.
6.0	<b>Implement Continuous Monitoring and Subcontractor Oversight:</b> Employ a risk-based approach to monitor compliance through desk reviews, site inspections, and worker interviews. Ensure prime contractors oversee subcontractor adherence to payroll and training requirements.
7.0	<b>Address Noncompliance Promptly:</b> Upon detecting violations, issue written notices, allow contractor responses, and calculate restitution as-needed. Execute corrective actions, which may include withholding payments until compliance is restored.
8.0	<b>Conduct Project Closeout Review:</b> Upon completion, thoroughly review payroll records and resolve any outstanding violations. Submit a Final Wage Compliance Report, documenting compliance efforts and restitution actions, if applicable.
9.0	<b>Maintain Documentation and Accountability:</b> Retain all labor compliance records for at least three years post-project completion. These records should include monitoring logs, payroll records, interview reports, and enforcement actions, ensuring readiness for audit requests and future accountability reviews.

## VI. SCOPE OF WORK AND EVALUATION CRITERIA

### A. *Applicability of Davis-Bacon Requirements*

#### 1. *Thresholds for Applicability*

Davis-Bacon requirements apply when all of the following conditions are met:

- **Federal Funding Involvement:** The construction, alteration, or repair project is funded in whole or in part with CDBG-DR funds.
- **Contract Value:** The prime contract (or combination of contracts) for construction exceeds \$2,000.
- **Project Type:** The project involves the construction, alteration, or repair (including painting and decorating) of public buildings or public works.

This includes, but is not limited to, infrastructure improvements, housing construction, water and sewer systems, roads, bridges, public buildings, and disaster mitigation projects.



## *2. Types of Projects Covered*

Under federal and state guidance, DBRA applies to the following activities:

- New construction and reconstruction of public infrastructure (e.g., roads, drainage systems, utility lines).
- Rehabilitation or major repair of public buildings or publicly assisted residential units (eight units or more).
- Demolition when part of a larger construction project subject to DBRA.
- Hazard mitigation construction activities (e.g., elevation, relocation, and floodproofing of structures).
- Disaster-related public works reconstruction.
- Residential housing projects involving a property that contains more than eight (8) units and is covered under a single contract.

These activities are subject to DBRA regardless of whether the CDBG-DR funding is the sole funding source or is used in conjunction with other federal, state, or local funds.

## *3.. Exemptions and Limitations*

Some activities funded under CDBG-DR are not subject to Davis-Bacon requirements. Exemptions include:

- Construction or rehabilitation of residential structures with fewer than eight units (single-family homes, duplexes, or small multifamily units).
- Projects funded exclusively with state or local funds and not part of a federally assisted construction effort.
- Force account labor—where work is performed directly by the employees of a unit of local government using its own equipment and staff.
- Planning, design, environmental review, and administrative costs (not related to direct construction work).
- Temporary emergency repairs conducted immediately after a disaster event and not part of a planned construction project.

HUD Handbook 1344.1 Rev-3 and 24 CFR § 570.603 establish these limitations clearly, and DHSEM will provide technical assistance to subrecipients to determine whether projects qualify for exemptions.



#### *4. Interaction with New Mexico State Law*

While DBRA establishes the minimum prevailing wage standard for federally assisted construction, the New Mexico Public Works Minimum Wage Act (NMSA 1978, §§ 13-4-10 to 13-4-17) may also apply concurrently to projects funded through blended federal and state sources. The Act requires that public works projects of and exceeding, sixty thousand (\$60,000) dollars adhere to state-determined prevailing wage rates established by the New Mexico Department of Workforce Solutions (NMDWS).

Where both federal and state prevailing wage requirements apply, the higher wage rate must be paid to affected workers and the lower dollar threshold rules.

#### *5. CDBG-DR Program-Specific Considerations*

DBRA compliance is required for:

- Projects funded under the Post-Disaster Infrastructure Investment Program and related mitigation work.
- Certain projects under the New Mexico Home Recovery Program where residential housing dwellings (eight units or more) are constructed or substantially rehabilitated.
- Subrecipient agreements involving public entities (e.g., municipalities, tribes, acequias) engaged in federally assisted construction.

DHSEM will ensure that all contracts, procurement documents, and scopes of work clearly identify whether DBRA applies and incorporate the applicable wage determinations and labor provisions at the outset of each project.

### ***B. Pre-Construction Phase***

#### *1. Wage Determination*

The U.S. Department of Labor (DOL) issues wage determinations that specify the minimum hourly wages and fringe benefits that must be paid to laborers and mechanics by work classification and geographic location.

Key requirements:

- DHSEM or the subrecipient must obtain the applicable DOL General Wage Determination from [www.sam.gov](http://www.sam.gov) before advertising any construction contract.
- The wage determination must reflect the county where the work will be performed and the type of construction (residential, building, heavy, or highway) involved.
- The prevailing wage determination generally locks in (i.e., fixed and effective) on the date the contract is awarded or when a negotiated contract is fully executed.



- For contracts entered into through sealed bidding procedures, the wage determination included in the solicitation applies as long as the contract is awarded within 90 days of the bid opening date.
  - Note: If the contract has not been awarded within the 90-day period, the most recent wage determination becomes applicable at time of award, unless the contracting agency requests and obtains an extension of the 90-day period from the Wage and Hour Division (WHD) Administrator. The contractor also has to agree to hold its bid for longer than the 90-day period in order for an extension to be relevant.
- For negotiated contracts, the wage determination is in effect at the time the contract is awarded or executed.
  - Note: There are exceptions, such as when a contract is changed (modified) to include substantial new work or when an option to extend the term of the contract is exercised that can decide which determination is applicable. The full wage determination, classifications and fringe benefits as listed on <https://sam.gov/> must be physically inserted in the bid package, contract documents, and subcontracts.

If work classifications needed for a project are missing from the wage determination, a Conformance Request (SF-1444) must be submitted to HUD for approval in accordance with 29 CFR § 5.5(a)(1)(ii). If a required work classification is missing from the wage determination after contract award, the contractor must submit an Additional Classification and Rate Request (SF-1444) through DHSEM to the U.S. Department of Labor at [whd-cbaconformance\\_incoming@dol.gov](mailto:whd-cbaconformance_incoming@dol.gov) in accordance with 29 CFR § 5.5(a)(1)(iii). Requests may not be submitted directly by subrecipients or contractors. See Section 3-17 of HUD Labor Standards Handbook 1344.1 REV-3 for criteria and procedures.

## *2. Bid and Contract Requirements*

All solicitations, bids, and contracts for CDBG-DR construction projects subject to DBRA must include the following:

- DOL Wage Determination that includes all relevant work classifications.
- Federal Labor Standards Provisions (HUD Form 4010).
- Required Contract Language, including:
  - Anti-Kickback Act provisions (29 CFR Part 3),
  - Payroll and recordkeeping obligations,
  - Restitution and enforcement rights,
  - Language from HUD Forms 5370 and/or 92554M, where applicable.

Contractors and subcontractors must acknowledge these terms during the bid and award process.



### *3. Contractor Eligibility Verification*

DHSEM and/or subrecipients must verify the eligibility of all contractors and subcontractors prior to the contract award. This includes:

- Checking the federal System for Award Management (SAM.gov) to ensure entities are not debarred or suspended.
- Confirming registration with the New Mexico Secretary of State and compliance with state licensing requirements.
- Ensuring that subcontractors are disclosed and approved prior to commencing work.

No contract may be entered into with a contractor or subcontractor listed on the federal Excluded Parties List System (EPLS) or otherwise debarred from working on federal projects.

### *4. Pre-Construction Conferences*

Before any work begins, DHSEM or the subrecipient must conduct a pre-construction conference with the contractor and all known subcontractors to review DBRA obligations.

The pre-construction conference must cover:

- Overview of DBRA and Copeland "Anti-Kickback" Act provisions.
- Requirements for submitting weekly certified payrolls (WH-347).
- Instructions for posting the wage determination and "Notice to All Employees" poster (WH-1321) on-site in a visible location.
- Explanation of required employee work classifications and the prohibition on improper deductions.
- Guidance on on-site worker interviews and record-keeping expectations.
- Penalties for non-compliance and restitution procedures.

Attendance must be documented, and meeting materials should be distributed to all participants.

### *5. Project Labor Compliance Files*

Before mobilization, DHSEM or the subrecipient must establish a labor compliance file for each project. This file must include:

- Wage determination(s).
- Executed contract(s) with federal labor standards provisions.
- Pre-construction conference documentation.
- Contractor and subcontractor contact information.



- Labor classification requests and approvals.
- Fringe benefit information.
- DBRA training records or materials.

These files will be used throughout the project for monitoring, enforcement, and reporting purposes, and must be retained for at least three (3) years after project closeout.

### ***C. Construction Phase***

#### ***1. Certified Payroll Reports***

All contractors and subcontractors working on DBRA-covered projects must submit weekly certified payroll records (Form WH-347 or equivalent) to DHSEM or the designated subrecipient. The prime contractor is responsible for submission of copies of payrolls by all subcontractors (29 CFR 5.5(a)(3)(ii)(A)), as well as reviewing subcontractor payrolls before they are submitted to subrecipients and DHSEM.

Payroll requirements:

- Payrolls must be submitted within seven days after the end of each workweek.
- Reports must include:
  - Each worker's name, work classification, hours worked (regular and overtime).
  - Rate of pay and fringe benefits.
  - Gross wages earned, deductions, and net wages paid.
- Each payroll must be accompanied by a Statement of Compliance, signed by the contractor or an authorized representative, certifying accuracy and full compliance with DBRA.
- Employee authorization must be provided for any non-standard deductions taken from an employee's earnings.

Subrecipients are responsible for collecting and reviewing these payrolls before forwarding summaries or issues to DHSEM.

#### ***2. Payroll Review and Compliance Verification***

DHSEM and subrecipients must establish a process to conduct systematic reviews of all certified payrolls submitted for DBRA compliance.

Review activities must include:

- Ensuring workers are paid no less than the applicable wage determination rates for the classification of work performed.
- Checking that overtime pay is properly calculated for hours exceeding 40 in a week.



- Interviews must be compared to submitted payroll records to confirm consistency.
- Verifying consistency in job classifications, wages, and fringe benefits.
- Ensuring all deductions are legal and, if necessary, authorized by employees.
- Identifying red flags such as:
  - Underpayment.
  - Misclassification.
  - Ghost employees or duplicate entries.
  - Missing or unsigned Statements of Compliance.

All deficiencies must be documented, investigated, and addressed through corrective action. Repeated or serious noncompliance may trigger audits, restitution orders, or referrals to HUD or DOL.

### *3. On-Site Monitoring and Worker Interviews*

To confirm the accuracy of payroll data and proper job classifications, on-site monitoring and worker interviews must be conducted on a regular basis.

Key requirements:

- Interviews must be unannounced and conducted using HUD Form 11 or an equivalent tool.
- Interviewers must verify:
  - Worker identity.
  - Job classification and duties performed.
  - Wage rates and frequency of pay.
  - Fringe benefit coverage.

All findings must be documented in the project labor compliance file and followed up with contractors, as necessary.

### *4. Job Site Requirements*

All DBRA-covered construction sites must have the following posted in a conspicuous location accessible to all workers:

- Applicable Wage Determination (entire document).
- “Notice to All Employees” Poster (WH-1321).

Failure to post this documentation is considered a compliance violation. DHSEM or the subrecipient must confirm proper postings during site inspections.



### *5. Handling Noncompliance Restitution*

If violations of DBRA requirements are identified during the construction phase, DHSEM and subrecipients must respond promptly.

The corrective action process includes:

- Notice of Violation: Issue a written notice to the contractor identifying the violation(s).
- Contractor Response: Provide the contractor with an opportunity to submit documentation or explanation.
- Restitution Calculation: Determine the dollar amount of back wages owed based on certified payrolls and worker interviews.
- Restitution Payment: Require the contractor to pay workers directly, with supporting documentation and signed acknowledgments.
- Withholding Funds: If the contractor fails to resolve the issue, DHSEM may withhold CDBG-DR payments until compliance is achieved.
- Assessment of Liquidated Damages: Penalties for overtime violations (for contracts that trigger CWHSSA) should be sent by wire transfer to the HUD U.S. Treasury account

Repeated or egregious violations must be reported to HUD Labor Relations and may be referred to the U.S. Department of Labor's Wage and Hour Division.

### *6. Subcontractor Oversight*

Prime contractors are responsible for ensuring their subcontractors comply with DBRA obligations.

Requirements include:

- Including the full wage determination and federal labor clauses in subcontract agreements.
- Monitoring subcontractor payroll submissions.
- Ensuring all subcontractors attend the pre-construction conference or receive equivalent training.

Prime contractors remain liable for any violations committed by their subcontractors.

### *7. Continuous Documentation and Audit Preparedness*

DHSEM and subrecipients must maintain comprehensive labor compliance documentation throughout the project, including:

- Weekly payroll logs and deficiency tracking.
- Worker interview records.



- Corrective action communications.
- Site visit records and photographic evidence.
- Copies of all posted notices and wage decisions.

This documentation must be retained for a minimum of three years after project closeout and must be made available upon request to HUD, DOL, or auditors.

#### ***D. Post-Construction Phase***

##### *1. Final Payroll Review and Closeout Verification*

Upon project completion, DHSEM and/or subrecipients must conduct a comprehensive final review of all certified payroll records submitted over the course of the project.

Final review tasks include:

- Ensuring all payrolls have been submitted by every contractor and subcontractor.
- Confirming that all workers were paid at or above the required wage rates for the duration of their employment.
- Verifying that any previously identified violations have been resolved and restitution has been issued.
- Ensuring that job classifications match the work performed as documented in on-site interviews.
- Verifying payment or waiver of any Liquidated Damages penalties assessed to the contractor.

A final labor compliance checklist should be completed and added to the labor compliance file to certify that DBRA responsibilities were fulfilled.

##### *2. Final Wage Compliance Report*

A Final Wage Compliance Report must be completed and submitted to DHSEM (or retained by DHSEM if they are the direct project administrator). This report must include:

- Project name and location.
- Prime contractor and all subcontractors.
- Duration of work performed.
- Summary of wage classifications used and applicable rates.
- Restitution or enforcement actions taken (if any).
- Signed certification of compliance by the subrecipient and/or contractor.



This report may be used for HUD monitoring purposes and must be retained for future audits.

### *3. Restitution Documentation*

If any underpayments or violations occurred during the project, documentation of restitution payments must be collected and stored. The contractor is required to report the restitution on a correction Certified Payroll Report (CPR). The correction CPR shall include:

- Each employee to whom restitution was paid.
- The employee's work classification.
- The total number of work hours involved.
- The adjustment wage rate (the difference between the required wage rate and the wage rate paid).
- The gross amount of restitution due.
- Deductions.
- The net amount paid.

Any unresolved issues must be referred to HUD or DOL for further action before project closeout.

### *4. Contractor Performance Evaluation and Debarment Review*

As part of the project closeout, DHSEM may conduct a performance review of all contractors and subcontractors. If a contractor was found to have committed repeated, willful, or unresolved labor standard violations, DHSEM may:

- Withhold final payment or retainage pending resolution.
- Recommend suspension or exclusion from future CDBG-DR projects.
- Refer the contractor to HUD or the DOL for investigation and possible inclusion in the federal debarment registry (SAM.gov).

This final review helps maintain integrity in New Mexico's CDBG-DR recovery program and protects worker rights across future construction efforts.

## ***E. Training and Technical Assistance***

### *1. DHSEM Training Program*

All contractors and subcontractors must receive training or technical briefings on DBRA compliance prior to mobilization.

DHSEM or the subrecipient will ensure that:

- Contractors attend pre-construction conferences that include labor standards requirements.



- Training materials are distributed and signed off by contractors before work begins.
- Non-English-speaking contractor staff are provided translated materials or interpreters where necessary.

Contractors are encouraged to provide their own internal DBRA training to payroll managers and site supervisors. DHSEM may audit contractor training records during monitoring.

### *2. Technical Assistance and Support*

DHSEM will provide direct technical assistance (TA) to subrecipients and contractors throughout the course of CDBG-DR implementation. TA may be initiated by DHSEM or requested by the partner entity.

TA topics may include:

- Determining applicability of DBRA to specific scopes of work.
- Addressing wage classification questions or requesting conformances.
- Reviewing payroll discrepancies or worker complaints.
- Navigating enforcement, withholding, or restitution processes.
- Preparing for HUD monitoring or audits.

DHSEM will assign designated labor compliance analysts to provide support, offer resolution pathways, and escalate complex issues to HUD or the U.S. Department of Labor when needed.

### *3. Outreach and Access*

To promote equitable compliance and understanding:

- DHSEM will ensure all training materials are 508-compliant and available in multiple languages, including Spanish and Diné (Navajo), as relevant to project geographies.
- Special outreach will be conducted to tribal governments, acequias, and rural entities to ensure technical barriers do not impede compliance.
- Office hours or “open lab” sessions may be offered during peak construction periods for live Q&A support.

### *4. Continuous Improvement*

DHSEM will evaluate the training and TA program annually to:

- Identify knowledge gaps based on monitoring findings.
- Update materials to reflect new HUD or DOL guidance.
- Incorporate feedback from subrecipients and contractors.



- Adjust frequency and format to maximize engagement and accessibility.

Training effectiveness will be measured through surveys, compliance data trends, and audit readiness metrics.

## ***F. Monitoring and Continuous Improvement***

### ***1. DHSEM Monitoring Responsibilities***

As the grantee, the New Mexico Department of Homeland Security and Emergency Management (DHSEM) is responsible for establishing and executing a formal labor standards monitoring process across all projects.

Monitoring responsibilities include:

- Verifying that wage determinations are properly included in contracts.
- Confirming that contractors and subcontractors are submitting timely and accurate certified payrolls.
- Conducting periodic desk reviews and site inspections.
- Interviewing workers to verify classification and wage compliance.
- Reviewing restitution documentation, if applicable.
- Ensuring that job site postings (wage decisions and notices) are visible and complete.
- Maintaining complete labor compliance files for every project.

Monitoring may be conducted by DHSEM staff or through designated labor compliance analysts assigned to specific project portfolios.

### ***2. Monitoring Strategies***

DHSEM will use a multi-layered approach to monitoring, tailored to project risk and scale:

- **Desk Reviews**
  - Occur monthly or bi-weekly during active construction.
  - Review certified payroll reports for accuracy, completeness, and classification errors.
- **On-Site Inspections**
  - Conducted at least once per construction project or more frequently for higher-risk or long-duration projects.
  - Include job site walk-throughs, visual inspections, and HUD Form 11 worker interviews.
- **Targeted Monitoring**



- Triggered by red flags (e.g., missing payrolls, possible falsified payrolls, worker complaints, inconsistent classifications).
- May result in full audits of project files and contractor payroll systems.
- **Audits**
  - Used to supplement regular monitoring and ensure compliance across all contractor tiers.

### *3. Monitoring Tools and Documentation*

DHSEM will utilize standardized HUD and internal tools for monitoring and tracking, including:

- HUD Form 11 – Record of Employee Interview.
- Payroll Review Checklists.
- Labor Standards Monitoring Logs.
- Restitution Summary Forms.
- Project Labor Compliance File Templates.

All findings, supporting documentation, and follow-up actions will be logged and stored in each project's labor compliance file.

### *4. Monitoring Schedule and Risk-Based Prioritization*

Projects will be prioritized for monitoring based on a risk matrix, considering:

- Project dollar amount and scope of work.
- Contractor experience with DBRA.
- Past history of compliance or violations.
- Number of subcontractors and complexity.
- Geographic reach (e.g., rural, tribal, or high-priority infrastructure areas).

High-risk projects will receive more frequent monitoring and technical assistance.

### *5. Corrective Action and Continuous Feedback*

If monitoring reveals deficiencies, DHSEM will initiate a corrective action plan that may include:

- Written notice of findings and required corrective actions.
- Technical assistance or retraining of contractors or staff.
- Restitution calculation and payment requirements.
- Follow-up site visits and verification.



- Referral to HUD or DOL in cases of repeated or egregious violations.

Findings from monitoring will be reviewed quarterly by DHSEM's Compliance and Program Integrity team to identify:

- Training needs.
- Recurring issues across projects or contractors.
- Policy or process adjustments.

#### *6. HUD and DOL Oversight*

DHSEM's labor standards compliance efforts are subject to oversight and audit by:

- U.S. Department of Housing and Urban Development (HUD).
- U.S. Department of Labor (DOL).
- HUD Office of Inspector General (HUD OIG).
- State of New Mexico DFA or Legislative Auditors.

DHSEM will fully cooperate with any authorized third-party monitoring or investigations and provide complete documentation upon request.

#### ***G. Reporting***

Local authorities and subrecipients must report to HUD on all DBRA regulated contracts awarded and on all enforcement actions taken every six (6) months. Semi-annual labor reports are due to HUD in April (for the period October 1 through March 31) and October (for the period April 1 through September 30). DHSEM monitors its subrecipients for completion of the reports. The Semi-Annual Labor Standards Enforcement Report form (HUD-4710) and Instructions (HUD-4710i) are available on HUD's website and in Appendix A.

Local authorities and subrecipients must retain a copy of the Semi-Annual Enforcement Report in their files. DHSEM will collect the reports from its subrecipients and compile a comprehensive report covering all the Davis-Bacon construction activity. When a contractor or subcontractor has underpayments totaling \$1,000 or more, they are required to submit an enforcement report to HUD (forwarded to the DOL), per 29 CFR 5.7(a)(2).

## **VII. ROLES AND RESPONSIBILITIES**

Effective implementation of Davis-Bacon and Related Acts (DBRA) requirements under the CDBG-DR program relies on clearly defined responsibilities across all entities involved in the funding, oversight, and execution of construction activities. This section outlines the specific roles and duties of the New Mexico Department of Homeland Security and Emergency Management (DHSEM), subrecipients, contractors, subcontractors, and federal and state oversight bodies to ensure full compliance with labor standards.



Stakeholder	Roles & Responsibilities
<p><b>New Mexico Department of Homeland Security and Emergency Management (DHSEM)</b></p>	<p>As the lead grantee and responsible entity for administering CDBG-DR funds, DHSEM holds the primary responsibility for ensuring DBRA compliance across all applicable projects. Key DHSEM responsibilities include:</p> <ul style="list-style-type: none"> <li>• <b>Policy Development and Oversight:</b> Develop, maintain, and update labor standards policies and procedures consistent with federal and state regulations. Ensure that all CDBG-DR projects subject to DBRA are appropriately flagged and monitored.</li> <li>• <b>Wage Determination and Procurement:</b> Identify and include appropriate U.S. Department of Labor (DOL) wage determinations in construction bid specifications and contracts. Ensure procurement documents include the applicable federal labor standards clauses and wage rates.</li> <li>• <b>Monitoring and Enforcement:</b> Review certified payroll reports submitted by contractors and subcontractors (e.g., WH-347 forms or equivalent). Conduct on-site interviews and employee verification to confirm compliance with prevailing wage requirements, along with verification that the contractor is meeting its federal wage posting requirements onsite. Investigate potential violations and enforce corrective actions when necessary. To ensure proper oversight and accountability, DHSEM Recovery Officers will conduct regular monitoring of subrecipients to verify project performance and confirm that work is completed according to approved scopes, timelines, and budgets. Subrecipients must submit progress reports, maintain detailed documentation, and comply with all procurement, environmental, and labor standards as defined under CDBG-DR regulations.</li> <li>• <b>Training and Technical Assistance:</b> Provide training to subrecipients, contractors, and staff on DBRA compliance. Serve as a technical resource to assist with interpretation of wage determinations and regulatory obligations.</li> <li>• <b>Investigating worker complaints:</b> Develop a system for receiving and reviewing complaints from workers, determining whether labor standards have been met, conducting investigations into alleged violations, and ensuring that any violations are corrected. Investigations can begin by determining if the</li> </ul>



	<p>complaint has merit and referred to HUD or DOL if deemed appropriate.</p> <ul style="list-style-type: none"> <li>• <b>Recordkeeping and Reporting:</b> Maintain all wage compliance records for a minimum of three years after project closeout. Submit required reports to HUD and cooperate with audits and compliance reviews.</li> </ul>
<p><b>DHSEM’s Labor Standards Coordinator</b></p>	<p>DHSEM’s Labor Standards Coordinator serves as the central point of contact for Davis-Bacon and Related Acts (DBRA) reporting and compliance for DHSEM and its subrecipients, contractors, and subcontractors supporting the program. Subrecipients, contractors, subcontractors and others are encouraged to reach out to DHSEM’s Labor Standards Coordinator with questions regarding DBRA compliance.</p> <p>Mailing Address:</p> <p>New Mexico Department of Homeland Security and Emergency Management (DHSEM)          Attention: CDBG-DR, Labor Standards Coordinator          P.O. Box 27111          Santa Fe, NM 87502</p>
<p><b>Subrecipients</b></p>	<p>Subrecipients are units of local government, tribal entities, or other designated partners that receive CDBG-DR funds to implement specific recovery activities, including infrastructure or housing projects. Subrecipient responsibilities include:</p> <ul style="list-style-type: none"> <li>• Ensuring that Davis-Bacon clauses and correct wage determinations are included in all bid packages, construction contracts, and subcontracts.</li> <li>• Conducting pre-construction conferences to inform contractors of DBRA obligations.</li> <li>• Collecting and reviewing weekly certified payrolls from all contractors and subcontractors.</li> <li>• Notifying DHSEM immediately if suspected violations or noncompliance occur.</li> </ul>
<p><b>Contractors and Subcontractors</b></p>	<p>Contractors and subcontractors performing work on DBRA-covered CDBG-DR projects must comply with all federal and state labor requirements. Their obligations include:</p>



	<ul style="list-style-type: none"> <li>• Paying all laborers and mechanics, including apprentices and trainees, no less than the prevailing wage rates and fringe benefits as determined by the DOL.</li> <li>• Submitting accurate and complete weekly certified payroll reports using DOL Form WH-347 (or equivalent).</li> <li>• Ensuring that all lower-tier subcontractors comply with the same labor requirements.</li> <li>• Allowing access to job sites for DHSEM or HUD personnel to conduct interviews and inspections.</li> <li>• Posting applicable wage determinations and "Notice to All Employees" posters at the construction site in a prominent and accessible place where those items can be easily seen by workers.</li> </ul> <p>Cooperating with investigations and providing resolution to all labor compliance issues that were identified prior to the closeout of the contract.</p>
<p><b>U.S. Department of Housing and Urban Development (HUD)</b></p>	<p>As the federal funding agency, HUD is responsible for overseeing the State’s adherence to labor compliance standards. HUD’s responsibilities include:</p> <ul style="list-style-type: none"> <li>• Issuing regulations and guidance, including wage determinations and labor standards forms e.g., HUD Handbook 1344.1 Rev-3).</li> <li>• Conducting monitoring reviews of DHSEM’s labor compliance systems and enforcement practices.</li> <li>• Providing technical support and policy clarification as needed.</li> <li>• Referring severe or unresolved violations to the U.S. Department of Labor.</li> </ul>
<p><b>U.S. Department of Labor (DOL)</b></p>	<p>The U.S. DOL enforces the provisions of the Davis-Bacon and Related Acts. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Issuing prevailing wage determinations for all classifications of labor across geographic regions.</li> <li>• Investigating complaints of wage violations or misconduct on federally funded construction projects.</li> <li>• Imposing sanctions, restitution orders, and potential debarment of contractors for serious or repeated violations.</li> </ul>



<b>New Mexico Department of Workforce Solutions (NMDWS)</b>	<p>For projects involving blended funding or subject to state prevailing wage laws, the NMDWS Labor Relations Division (LRD) plays an enforcement and advisory role. Their responsibilities include:</p> <ul style="list-style-type: none"><li>• Issuing wage determinations for public works projects of and exceeding sixty thousand (\$60,000) dollars.</li><li>• Reviewing certified payrolls and conducting audits where applicable.</li><li>• Enforcing compliance through restitution, payment withholding, or contractor sanctions under the Public Works Minimum Wage Act.</li></ul>
---	---

## VIII. COMPLIANCE & ENFORCEMENT

### A. *Noncompliance and Violation Types*

Noncompliance may occur intentionally or due to oversight. In either case, DHSEM and subrecipients are required to investigate, document, and resolve the following types of violations:

- Underpayment of wages or fringe benefits.
- Worker misclassification.
- Failure to submit or falsification of certified payrolls.
- Unauthorized payroll deductions or kickbacks.
- Failure to post wage decisions and worker notices at the job site.
- Use of debarred or suspended contractors or subcontractors.

Each of these actions violates DBRA requirements and may trigger enforcement under federal and state labor law.

### B. *Corrective Action Process*

When a potential violation is identified, DHSEM or the subrecipient must initiate the following corrective action protocol:

- Notice of Finding (NOF): Issue a written notice to the contractor outlining the nature of the violation(s) and required corrective measures.
- Contractor Response: Allow the contractor an opportunity to respond, submit supporting documentation, or dispute the findings.



- **Restitution Calculation:** If underpayment is confirmed, calculate back wages and fringe benefits owed to affected workers, including calculation of any Liquidated Damages penalties (for overtime violations).
- **Restitution Payment:** Require the contractor to provide restitution directly to workers and submit proof of payment (e.g., certified correction payroll, checks, signed acknowledgments) or requested a waiver that was approved by DHSEM, HUD, etc.
- **Compliance Verification:** Confirm resolution through updated payrolls, documentation review, or follow-up interviews.
- **Final Closure Notice:** Once resolved, DHSEM will issue a written closure letter confirming compliance restoration.

### ***C. Payment Withholding***

If a contractor fails to respond to a violation or refuses to correct the issue:

- DHSEM may withhold payment from the contractor in the amount necessary to ensure restitution.
- Subrecipients must notify DHSEM of any refusal by a contractor to make corrections so that funds can be frozen pending enforcement.
- HUD may be contacted for additional support, if the contractor is noncompliant.

Authority to withhold payment is granted under 29 CFR § 5.5(a)(2) and enforced in coordination with HUD and DOL when necessary. Also, 29 CFR 5.5(b)(3) - Withholding for unpaid wages and liquidated damages - allows recipients to withhold for unpaid wages and liquidated damages assessed under CWHSSA.

### ***D. Debarment and Referral***

If violations are serious, willful, repeated, or unresolved, DHSEM may recommend further actions:

- Referral to HUD Office of Labor Relations or DOL Wage and Hour Division for investigation.
- Initiation of debarment proceedings against the contractor and any culpable subcontractors under 29 CFR § 5.12.
- Placement of the contractor on the federal exclusion list (SAM.gov), prohibiting them from receiving future federally funded contracts.

Debarment may extend for up to three years and is published in the federal registry. DHSEM may also consider exclusion from future CDBG-DR-funded projects at the state level.



### ***E. State Enforcement through NMDWS***

In cases where state prevailing wage laws (NMSA 1978, §§ 13-4-10 to 13-4-17) are also applicable:

- Violations may be referred to the New Mexico Department of Workforce Solutions (NMDWS) Labor Relations Division.
- NMDWS may conduct audits, investigations, or hearings.
- Sanctions can include payment withholding, restitution orders, contractor registration suspension, or state-level debarment.

### ***F. Documentation of Violations***

All enforcement actions must be thoroughly documented and stored in the project labor compliance file, including:

- Notices of Finding.
- Contractor responses and evidence.
- Restitution calculations and payment proof.
- Internal and external correspondence.
- Final enforcement resolutions or referrals.

This record must be maintained for a minimum of three (3) years and will be subject to audit by HUD, DOL, or other authorized entities.

## **IX. CONFLICTS OF INTEREST AND MODIFICATIONS**

- X. To maintain the highest standards of integrity, all stakeholders, including DHSEM staff, subrecipients, contractors, and partners, must adhere to strict conflict of interest guidelines and the Conflict of Interest Policy.**
- DOCUMENTATION & RECORDKEEPING**

In accordance with 29 CFR § 5.5 and HUD Handbook 1344.1 Rev-3, all labor compliance records must be retained for a minimum of three (3) years after the completion date of applicable project. DHSEM and subrecipients are responsible for maintaining these records and ensuring accessibility for audits, monitoring visits, or investigations.

Labor compliance files must include:

- Wage determinations.
- All certified payrolls and Statements of Compliance.
- On-site interview records (HUD Form 11).



- Pre-construction conference documentation.
- Monitoring and inspection logs.
- Restitution calculations and resolutions.
- Final Wage Compliance Report.
- Correspondence with HUD, DOL, and contractors.

Digital and physical recordkeeping systems should be secure and organized, with file structures that support easy retrieval and transfer to auditors or federal reviewers.

## XI. REFERENCES

This policy is grounded in the following legal authorities and labor standards:

Executive Order, Federal and State Laws and Regulations	Description
<b>Davis-Bacon Act</b> (40 U.S.C. §§ 3141–3148)	Mandates the payment of local prevailing wages and fringe benefits on federally funded construction contracts.
<b>Section 110 of the Housing and Community Development Act of 1974</b> (42 U.S.C. § 5310)	Applies DBRA provisions to CDBG-funded projects involving construction, alteration, or repair.
<b>HUD Handbook 1344.1 Rev-3</b>	Provides comprehensive guidance on federal labor standards in HUD programs.
<b>New Mexico Public Works Minimum Wage Act</b> (NMSA 1978, §§ 13-4-10 to 13-4-17)	Enforces state prevailing wage standards for public works projects.
<b>Contract Work Hours and Safety Standards Act (CWHSSA)</b>	Mandates overtime pay at 1.5 times the regular rate for hours worked over 40 per week on contracts exceeding \$100,000. This ensures that laborers and mechanics receive fair compensation for extended work hours.
<b>Copeland Anti-Kickback Act</b>	Prohibits contractors from requiring employees to return a portion of their wages and mandates strict record-keeping to prevent wage theft.



<p><b>Fair Labor Standards Act (FLSA)</b></p>	<p>Establishes federal minimum wage and overtime protections, which apply in conjunction with Davis-Bacon requirements.</p>
<p><b>24 CFR Part 570</b></p>	<p>Governs the administration of the CDBG program.</p>
<p><b>29 CFR Parts 1, 3, 5, 6, and 7 (DOL DBRA Regulations)</b></p>	<p>Define federal labor standards, procedures, and enforcement mechanisms.</p>
<p><b>New Mexico Public Works Minimum Wage Act (NMSA 1978, §§ 13-4-10 to 13-4-17)</b></p>	<p>Enforces state prevailing wage standards for public works projects. It requires that public works projects of and exceeding sixty thousand (\$60,000) dollars adhere to state-determined prevailing wage rates established by NMDWS. Where both federal and state prevailing wage requirements apply, the higher wage rate must be paid to affected workers and the lower dollar threshold rules.</p>
<p><b>DOL Wage and Hour Division Resources</b> <a href="http://www.dol.gov/agencies/whd">http://www.dol.gov/agencies/whd</a></p>	<p>Provides resources and regulatory information on federal labor standards, including minimum wage, overtime, and prevailing wage requirements, to help ensure fair labor practices across various industries.</p>
<p><b>Federal Register Notices for 2024 CDBG-DR Allocations (90 FRN 4759 &amp; 90 FRN 1754)</b></p>	<p>Official notices detailing regulations and allocations for the CDBG-DR program in 2024, providing guidance on funding distribution and compliance requirements for disaster recovery projects.</p>
<p><b>HUD Labor Standards Resources</b> <a href="http://www.hud.gov/program_offices/davis_bacon">http://www.hud.gov/program_offices/davis_bacon</a></p>	<p>Offers guidance on compliance with Davis-Bacon labor standards for HUD-funded projects, including technical assistance, policy updates, and resources for understanding wage determination and enforcement mechanisms.</p>



<p><b>SAM.gov</b> <a href="https://sam.gov/">https://sam.gov/</a></p>	<p>The System for Award Management is used to verify contractor eligibility through debarment checks, ensuring that federal contracts are awarded to verified and compliant entities.</p>
---	---

## XII. APPENDICES

### A. Appendix A: Required Federal Labor Standards Forms

DHSEM and subrecipients must use the following forms for DBRA compliance or a DOL-approved labor standards tracking system such as LCP tracker which incorporates the use of these forms:

Form	Purpose	Link
<b>HUD-11</b>	Records worker interviews onsite for compliance; compared to payroll reports.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/11.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/11.pdf</a>
<b>HUD-11-SP</b>	Spanish-language version of HUD-11.	<a href="https://opportunityiowa.gov/media/7334/download?inline">https://opportunityiowa.gov/media/7334/download?inline</a>
<b>HUD-4010</b>	Required labor provisions in construction contracts.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4010.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4010.pdf</a>
<b>HUD-4710</b>	Used every 6 months to report DBRA activity.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4710.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4710.pdf</a>
<b>HUD-4710-I</b>	Instruction guide for completing HUD-4710.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4710i.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4710i.pdf</a>
<b>HUD-4720</b>	Lists wage rates for project labor categories.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4720.doc">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4720.doc</a>
<b>HUD-4730</b>	Used in lieu of HUD 11 when onsite interviews are not possible.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4730.docx">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4730.docx</a>
<b>HUD-4731</b>	Used to document DBRA-related worker complaints.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4731.docx">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4731.docx</a>



<b>HUD-4732</b>	Agreement for securing wage compliance via deposits.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4732.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4732.pdf</a>
<b>HUD-4733</b>	Wire-transfer guidelines for deposit accounts.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4733.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4733.pdf</a>
<b>HUD-4734</b>	Voucher form for deposit account transactions.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4734.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4734.pdf</a>
<b>HUD-4741</b>	Guide for HUD onsite monitoring reviews.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4741.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4741.pdf</a>
<b>HUD-4743</b>	Guide for state-level CDBG/HOME monitoring.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4743.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4743.pdf</a>
<b>HUD-4750</b>	Used to recommend wage rates for maintenance work.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4750.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4750.pdf</a>
<b>HUD-4751</b>	Tool for surveying current wage rates.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4751.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4751.pdf</a>
<b>HUD-4752</b>	Summary form for completed wage surveys.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/4752.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/4752.pdf</a>
<b>HUD-5370</b>	Standard contract conditions for construction.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/5370.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/5370.pdf</a>
<b>HUD-5370-C</b>	Conditions applicable for non-construction agreements.	<p><b>Section I:</b>  <a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/5370C1.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/5370C1.pdf</a></p> <p><b>Section II:</b>  <a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/5370C2.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/5370C2.pdf</a></p>
<b>HUD-5370-EZ</b>	Streamlined conditions for smaller HUD-assisted projects.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/5370EZ.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/5370EZ.pdf</a>
<b>HUD-92554M</b>	Additional contract clauses for HUD-assisted construction.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/92554M.pdf">https://www.hud.gov/sites/dfiles/OC/HCO/documents/92554M.pdf</a>
<b>HUD-92554-ORCF</b>	ORCF-specific supplementary conditions form.	<a href="https://www.hud.gov/sites/dfiles/OC/HCO/documents/92554_orcf.docx">https://www.hud.gov/sites/dfiles/OC/HCO/documents/92554_orcf.docx</a>



<b>WH-347</b>	Weekly payroll report as required by Davis-Bacon.	<a href="https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/wh347.pdf">https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/wh347.pdf</a>
<b>WH-1321</b>	Mandatory poster informing workers of wage rights.	<a href="https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/fedprojc.pdf">https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/fedprojc.pdf</a>
<b>WH-1321-SP</b>	Spanish-language version of the poster.	<a href="https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/davispan.pdf">https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/davispan.pdf</a>