

SECTION 112.00 – LABOR COMPLIANCE

112.00 General. The Idaho Transportation Department, as a contracting agency, is responsible to assure labor compliance by contractors, following federal-aid guidance and regulations, including Equal Opportunity (EO) requirements.

Any contracts, financed in whole or in part by federal-aid funds, must include the Required Contract Provisions (FHWA-1273) bound in the signed contract documents. These special provisions also require that all laborers and mechanics employed at the project site that perform contract work (including those performing remedial work under contract warranty clauses) be paid the prevailing (Davis-Bacon) wage and fringe benefit rates as established by the U.S. Department of Labor (USDOL). The USDOL defines laborers and mechanics in [29 CFR 5.2 \(m\)](#) as those whose duties are manual or physical in nature (e.g., workers who use tools or who are performing the work of a trade), as distinguished apart from that of mental or managerial duties.

The contract provisions are based on:

- Davis-Bacon Act – Requiring payment of prevailing wage and fringe benefit rates as determined by the USDOL to all laborers and mechanics on federal government contracts.
- Copeland Act – Making it a Federal crime for anyone to require a laborer or mechanic to kickback their wages, and requiring contractors to provide weekly-certified payroll report submittals.
- Contract Work Hours and Safety Standards Act – Requiring time and one-half pay for overtime hours (i.e., over 40 hours in any workweek).
- [23 CFR Part 230, Subpart D](#)
- [23 CFR Part 633, Subpart A](#)
- [23 CFR Part, 635.309](#)
- [29 CFR Parts 1, 3, 5](#)

Truck Drivers. Truck drivers are to be paid prevailing wage and fringe benefit rates when:

- Contractor or subcontractor drivers working **on the project site** (as defined below in Subsection 112.03).
- When loading and/or unloading materials or supplies on the project site for **more than 20%** (“de Minimis” time) of the delivery driver’s workweek. Time accounting for de Minimis is the Contractor’s responsibility, begins when the truck enters the project limits, and continues until the truck is outside of the project limits.
- Transporting materials or supplies **between** a facility that is part of the project site and the actual construction site.
- A driver transporting a portion(s) of the building material or when he/she works **between** a project site established specifically for the performance of the contract, or project, and where significant portions of the building or construction work takes place.

Leased Employees. The prime contractor must consider leased employees as part of its own organization and must pay the prevailing wage and fringe benefit rates, payroll submissions, compliance statements, and all other applicable federal requirements provided:

- The prime contractor maintains supervisory control over leased employee day-to-day activities.
- The prime contractor remains responsible for leased employee work quality.
- The prime contractor retains all authority to accept or exclude individual employees from work on the project.

112.01 Project Posters. A list of bulletin board requirements, including links where current required posters can be viewed and downloaded can also be obtained on the ITD external website under "DOING BUSINESS WITH ITD->, Click for More Topics-> Construction Resources" OR "Inside ITD-> Click for More Topics-> Construction/Materials."

<http://itd.idaho.gov/wp-content/uploads/2016/05/constructionPosters.pdf>

Residency staff must verify that the Contractor is displaying the required posters on the project site bulletin board.

112.02 Wage Decision Classifications. Each contract will contain the DOL published wage decision (WD) applicable to the project. The WD is the wage and fringe benefit rate listing for each laborer and mechanic classification, which the Department of Labor Wage and Hour Division Administrator predetermined to be the prevailing wage within a given area for a particular construction type.

The WD included in the contract may not always include all classifications needed for the required work on a project. In these cases, it is the Contractor's responsibility to identify all unlisted classification(s), including the applicable prevailing wage and fringe benefit rates for that work. These additional classifications may be added after award only as provided in [29 CFR 5.5\(a\)\(1\)\(ii\)](#). Use the following link for guidance on the [Davis-Bacon Additional Classifications Process](#).

Bidding Phase. In response to contractor inquiries regarding the WD in the contract:

- Refer contractors to the WD clause: "*Unlisted classifications needed for work not included within the scope of the classifications listed may be added after award only as provided in the labor standards contract clauses (29 CFR 5.5(a)(1)(ii))*".
- Refer contractors to the DOL website which includes the [Prevailing Wage Resource Book](#). The Prevailing Wage Resource Book provides instructions regarding what information the DOL needs and how they will evaluate additional classification and wage rate requests.
- Refer contractors to the DOL Wage and Hour Division (<http://www.dol.gov/whd/>) if they desire further clarification regarding proper WD applications for specific upcoming projects.

- Inform contractors that all Request for Authorization of Additional Classification and Rate must be submitted on the [DOL SF-1444 form](#), including all necessary supporting documentation. SF 1444 forms should be submitted to the DOL at the following email address: WHD-CBACONFORMANCE_INCOMING@dol.gov.

Emphasize:

- It is the contractor's responsibility to determine the correct prevailing wage to use when preparing bids.
- The DOL has final approval authority for additional classifications.

After Award. Discuss the wage decision (WD) and conformance criteria (i.e. Are additional classifications needed on this project?) during the pre-construction conference. Provide the SF-1444 form to the Contractor if needed.

The contractor request for additional classes and rates must be in accordance with the WD in the [Prevailing Wage Resource Book](#). Specifically, the request must address the following:

- Work to be performed is not performed by a classification already listed on the applicable WD.
- Requested rate bears a reasonable relationship to other rates in the WD.
- Request complies with the guidance provided in the Prevailing Wage Resource Book.
- Submit the request to DOL for review and ruling (email the SF-1444 and a copy of the contract WD to the DOL at the following email address:
WHD-CBACONFORMANCE_INCOMING@dol.gov).
- The regulations allow the DOL 30 days to respond with a ruling; however, if DOL does not response within 30 days that does not indicate tacit approval.
- Communicate the DOL determination to the Contractor and other interested parties immediately upon notification.
- Communicate the DOL determination to the Contractor and other interested parties. Advise the Contractor and other interested parties of the reconsideration and appeal process available under the regulations ([29 CFR 5.5\(a\)\(9\)](#)) and [29 CFR Part 7](#).

During the Project. All Contractor and subcontractor (including lower tiered subcontractor) employees that meet the definition of a mechanic or laborer, as defined in the Code of Federal Regulations, must have a valid classification. Residency staff must also:

- Review certified payrolls. Look for classifications not listed in the WD or approved in advance or shortly thereafter the commencement of the project by the DOL as an additional classification request.
- Conduct onsite inspections, perform employee interviews, review certified payrolls, and identify additional classes if applicable.
- Address all non-compliance, complaints, and issues.
- Upon becoming aware, immediately address non-compliance with Davis Bacon, Equal Employment Opportunity, and/or complaints of discrimination.

- Document for the Project File II discussion and all actions taken
- Consult with the DOL Wage and Hour Division
- Contact the Construction/Materials Section for additional assistance

Zone Differentials. The wage decision may indicate different work classification rates depending on established zones. 112.03 below defines zone determination as the physical place of the site of work. If the physical place of the project is located in two zones, the lower zone rate applies. Refer any questions concerning zone-differential pay rates to the Construction/Materials Section.

112.03 Site of Work. Contractors of all tiers must pay laborers and mechanics the prevailing wage and fringe benefit rates for the work performed at the site of work.

Title [29 CFR 5.2 \(l\)\(1\)](#) states "*The site of the work is the physical place or places where the building or work called for in the contract will remain; and any other site where a significant portion of the building or work is constructed, provided that such site is established specifically for the performance of the contract or project*".

In addition, Title [29 CFR 5.2 \(l\)\(2\)](#) further clarifies that other work sites not located on the site of permanent construction, such as "*job headquarters, tool yards, batch plants, borrow pits, etc., are part of the site of the work, provided they are dedicated exclusively, or nearly so, to performance of the contract or project, and provided they are adjacent or virtually adjacent to the site of the work*".

The federal regulations do not define what is considered virtually adjacent. However, the Department has determined that all work areas located within a 1-mile distance of the project limits will be considered virtually adjacent, unless it can be shown otherwise by the Contractor.

Per [29 CFR 5.2 \(l\)\(3\)](#), work sites "*Not included in the site of the work are permanent home offices, branch plant establishments, fabrication plants, tool yards, etc., of a contractor or subcontractor whose location and continuance in operation are determined wholly without regard to a particular Federal or federally assisted contract or project. In addition, fabrication plants, batch plants, borrow pits, job headquarters, tool yards, etc., of a commercial or material supplier, which are established by a supplier of materials for the project before opening of bids and not on the site of the work as stated in paragraph (l)(1) of this section, are not included in the site of the work. Such permanent, previously established facilities are not part of the site of the work, even where the operations for a period of time may be dedicated exclusively, or nearly so, to the performance of a contract.*"

112.04 Warranty Work. Labor compliance as described throughout this section applies to all warranty or repair work. Therefore, a Contractor and/or subcontractor must also comply with these requirements, regardless of whether the work is five, ten, or more years after the original contract execution, if the Department uses federal-aid to fund any portion of the contract.

112.05 Exemptions. The DOL does not consider personnel who spend a major portion of their time on administrative, executive, or clerical duties as covered under these requirements. **However, a working foreman that devotes more than 20 percent of his/her time during a workweek on mechanic or laborer duties will be classified as a laborer or mechanic for the time spent performing those duties.**

Other exemptions are:

- Apprentices and Trainees. The only laborers and mechanics that may be paid below wage decision rates for a work classification, provided the apprentice or trainee is registered in an approved training program. Apprentices and trainees should be paid at the rates in the applicable approved training program.
- Survey Personnel. Contractors and/or consultant firms must consider survey crew members as subject to these provisions. Generally speaking, instrument operators, party chiefs, and rod persons are not covered, as they are not considered laborers and/or mechanics. However, crew members that perform manual work (e.g., clearing brush) fall within these provisions.
- Owner-Operator. This applies only to truck owner-operators. The owner-operator concept does not encompass other equipment (e.g., bulldozers, scrapers, backhoes, cranes, drilling rigs). To be considered an owner-operator, the owner must be driving the truck. Such owner-operators must be identified on payrolls with the notation "owner-operator" after each person's name. However, it is not necessary to enter the number of hours worked, the wages paid, or the fringe benefits earned. If an owner-operator has more than one truck employed on a contract, the owner-operator must be a subcontractor. In addition, do not classify the other truck drivers (employed by the owner-operator) as owner-operators.

Department staff/CE&I consultants will complete owner-operator interviews. Ask the driver to see their driver's license, vehicle registration, insurance document, and fuel permit. All of these documents must show the same owner-operator name. The owner-operator is also responsible for major and minor vehicle repairs/maintenance and for fuel/oil payments as documented by maintenance logs and receipts.

If an individual (not a corporation or LLC) provides evidence that he/she leased a truck, then that individual may be considered an owner-operator. The evidence provided for review must be compelling and satisfactory to the Resident Engineer. The evidence must include a bona fide lease agreement. Additionally, an owner-operator must:

- Be independently established in his/her own trucking business
- Bear ultimate responsibility for operation of the unit

- Be wholly responsible for cost items.

Compelling evidence includes:

- Maintenance logs and receipts
- Full Coverage Vehicle Insurance (Comprehensive, collision, liability, etc.)
- Permits, base plates, licenses, and taxes
- Fuel receipts
- Oil Change receipts
- Major and minor repair records
- Ferry charges and tolls paid
- Driver's remuneration (e.g., salaries, earnings, wages).

The evidence must also demonstrate that there is no close or continued supervision of the truck operation by the company leasing the truck (lessor). This means that the owner-operator may not work on a project upon which the lessor is a prime or subcontractor.

- *Guards and Watchmen.* Employees serving only as a guard or watchman are exempt. However, the wage rate paid must be at least equal to the current minimum rate under the Fair Labor Standards Act.
- *Suppliers.* The manufacturing offsite and the delivery of supplies to the project site, (e.g., sand, gravel, ready-mixed concrete) when performed by companies serving the general public, are typically exempt. The manufacturer and/or supplier must be able to demonstrate a history of sales prior to project bid advertisement.
- *Truck Drivers.* Davis-Bacon wage rates are not applicable for truck drivers under the following types of situations:
 - Material delivery truck drivers while off the project site.
 - Contractor or subcontractor drivers traveling between a Davis-Bacon job and a commercial supply facility while they are off the project site.
 - Truck drivers spending only a few minutes (i.e. less than de Minimis) at the worksite waiting to pick up or drop off materials or supplies are exempt.

Contact the Construction/Materials Section if you have any questions regarding a specific truck driver's exemption status.

- *Railroad and Utility Adjustments.* The contract provisions are not applicable to: 1) relocation work done by a public utility or railroad with their own forces, or 2) relocation done by a contractor engaged directly by the utility or railroad. It is important to note that if ITD engages the utility to move ITD's utilities, as part of the utility adjustment, then there must be a separate accounting of labor, equipment, and materials.
- *Quality Control/Quality Assurance.* Personnel whose duties are material sampling and testing, and/or include quality and contract compliance inspections are exempt.
- *Traffic Control.* Personnel who provide traffic control for equipment drop-off and pick-up are typically exempt.

- Purchase orders, rental agreements, and other agreements for supplies or services.
- State or local agency force account labor.
- Contracts for debris removal following a natural disaster per USDOL.
- Separate projects on a local road or rural minor connector, not physically connected at either end to a Federal-Aid highway right-of-way.

112.06 Certified Payroll Reporting and Contractor Records Retention. Regulations require contractors to submit certified payrolls.

Contractors and subcontractors must submit weekly certified payrolls to the Resident Engineer (RE). In turn, the RE and his/her staff will check certified payrolls and retain them as part of the project file. Detailed checking of all certified payrolls is not necessary. Provide a detailed check of the first submitted payroll, any payroll with employee spot check interviews, and payrolls with new employees. Subsequent spot checks fulfill the checking requirements, except on certain projects where experience with an individual contractor indicates that a thorough review of each certified payroll is necessary. Subsection 112.12 herein contains a certified payroll review checklist.

Number certified payrolls consecutively. Consecutive numbering should be maintained for the prime contractor and for each subcontractor (or sub-subcontractor) working on a project. Submit numbered certified payrolls for time periods not worked but indicate "No Work was performed" across the form. When certified payrolls are not submitted during work suspension periods (e.g., winter), the Contractor (or subcontractor) should make a statement on the last certified payroll that no work will be accomplished until further notice. However, the project files should have adequate documentation to substantiate the fact that the Contractor (or subcontractor) was not performing work during periods when the contractor was not submitting certified payrolls. After suspension, when work resumes, the next consecutive number should be assigned.

Certified payroll copies must be completely legible. Do not accept faded or blurred copies. Upon discovering an error, do not return the payroll for correction. Instead, request a supplemental or corrected certified payroll.

There is no mandatory format for a Contractor or subcontractor certified payroll; however, all certified payrolls must contain the following information:

- The project number.
- The employer's full name.
- The employee's:
 - Classification in accordance with the contract wage-decision determination and/or any USDOL-approved additional classification(s).
 - Hourly wage and fringe benefit rate(s).
 - The number of hours the employee worked each day with overtime shown separately.
 - The gross amount earned.

- The itemized deductions made. Authorized deductions include those allowed or ordered by law (such as taxes and liens) and those requested by the employee. Verify all questionable deductions on the payroll and only allow correctly authorized deductions.
- The net amount paid.

Contractor certified payrolls are public records and are subject to disclosure, by statute, upon request. When receiving such a request, refer the requestor to the party who originated the document. If the requestor cannot obtain the information directly from the Contractor, they should state this in a letter to the District Engineer.

Upon receipt of this letter, the district will mail a copy of the requested information to the requestor with employee addresses and social security numbers redacted (blocked out completely). The cost for providing this service will be in accordance with the Department's Financial Services Section guidelines.

The Contractor must retain all payroll records for a minimum of three years after Department final acceptance of the project or final payment receipt for the contract work, whichever is longer. The contract work is not complete until the warranty period ends.

Statement of Compliance (WH-347). A statement of compliance must accompany each certified payroll and an authorized agent of the contractor must certify in writing that the facts are true. The statement indicates that the payrolls are accurate and complete, the wage rates contained therein are not less than those required by the contract wage decision, and the classifications set forth for each laborer or mechanic conform with the work performed. Use one of the following for the Statement of Compliance:

- [WH-347](#) form, the optional Payroll and Statement of Compliance form that incorporates the statement of compliance on the reverse side.
- The contractor may prepare and submit another form, which must be attached to the payroll or noted thereon, as long as the contractor uses identical wording as contained on the WH-347 form.

112.07 Payroll Appointment Affidavit. If a contractor or subcontractor appoints a person other than a corporate officer, partner, or the sole proprietor to execute the weekly certified payroll statement, it must be indicated on a Payroll Appointment Affidavit ([ITD-1800](#)). The District staff should supply the Contractor with a blank ITD-1800 with the notice of intent to award. The completed payroll appointment affidavit should accompany the first payroll from the Contractor or subcontractor (including lower tier subcontractors), if applicable. In the event a contractor changes the authorized certifying individual, then the contractor must submit a new payroll appointment affidavit immediately.

If the Contractor or subcontractor is a corporation, then the President or Vice President must execute the payroll appointment affidavit.

When the Contractor or subcontractor is a partnership, then a member of the firm must execute the payroll appointment affidavit.

112.08 Fringe Benefit Payments. Typically, the wage decisions contain the fringe benefit rates or the additional classification process establishes the rate. Employers must make payment for the required benefits in the following manner:

- To an established approved program authorized by the USDOL: Generally, an employee accepts this method of fringe benefits payment as a condition of employment.
- To a predetermined program(s) (e.g, health insurance, life insurance, retirement accounts, savings accounts) where the employee agrees, enrolls, and voluntarily signs on to the program: The employee must designate his/her beneficiary(ies). In addition, the employee must willingly accept and allow the contractor to enroll the employee in the program(s).
- A direct payment of cash to the employee.
- Any combination of the above choices.

The contractor must state the fringe benefit compensation method clearly on the statement of compliance. If payment is by cash, it must be readily determined from the certified payroll.

112.09 Overtime. For federal-aid projects, all hours worked in excess of 40 hours per week must be paid at one-and-a-half times the basic wage rate. The term "basic wage rate" means the straight time hourly rate actually being paid or the contract wage decision minimum rate, whichever is greater. The contractor is to apply fringe benefits to overtime hours at a straight time rate. For overtime purposes, contractors may pay state holiday at a normal workday rate.

For non-Federal-Aid Projects, all hours worked in excess of 40 hours per workweek must be paid at one-and-a-half times the basic wage rate (use "basic wage rate" described above).

112.10 Employee Interviews. The Resident Engineer or his/her staff must conduct contractor employee interviews to verify compliance with federal and state statute. District staff must record all employee interviews on the ITD Labor Compliance Employee Interview form ([ITD-2014](#)). Staff must conduct interviews throughout a project's lifecycle to ensure a sufficient representative sample for all employed worker classes and ethnicities on the contract. To be considered sufficient, interviews need to include both a representative sample of the Contractor and subcontractor(s) (including lower tier subcontractor) employees.

112.11 Non-Compliance. If there are questions of non-compliance, follow these required steps. Non-compliance may be uncovered by: 1) certified payroll reviews; 2) employee interviews; and/or 3) receipt of a complaint by project personnel, labor unions, the Department of Labor (US or Idaho), or other outside individuals or organizations. Treat all complaints as confidential and investigate as follows:

- When applicable, send a letter to the affected employee(s) by certified mail requesting information ([Figure 112.11.01](#) below).

- Notify the Contractor of possible non-compliance by letter. In this letter, request the Contractor's help and seek an explanation and/or correction about the matter in question. If it is found that the reporting (or certified payroll) was made in error, ask for an amendment or a corrected report (or certified payroll). **DO NOT** return the original report (or certified payroll).
- If non-compliance is still in question, or if the affected contractor denies it, then residency staff must perform a more comprehensive investigation. This includes performing additional interviews with the person or persons involved in the alleged non-compliance. The investigation should include everyone involved, along with the contractor's representative. This may also include an audit of the affected contractor's records.
- If the investigator finds a contractor in non-compliance with the contract requirements, inform the Contractor in writing, and request appropriate corrective actions be taken. If there is an underpayment of wages, the contractor must furnish a supplemental certified payroll indicating that the contractor made restitution. It may be necessary, in certain instances, for the contractor to furnish additional proof of payment in the form of photo copy of both sides of the adjustment check or signed acknowledgement from the employee that the contractor made the employee whole.
- Upon finding non-compliance, keep an adequate chronological record until its final disposition. Keep the contractor apprised about all actions that progress during the investigation (preferably in writing). Seek assistance from the Construction/Materials Section, the Department EEO Manager, and/or the Legal Section as necessary or applicable.

The most frequent occurrences of non-compliance result from the following two situations:

- 1) Subcontractor Violations. The prime contractor at times fails to realize that he/she is responsible for the subcontractor's (and lower tier subcontractor's) labor compliance, and that the contracting agency has no direct contract with the subcontractors (and lower tier subcontractors) and must deal with the prime in these matters. These labor compliance violation types often require the prime contractor to pay restitution for wages due by the subcontractor (and lower tier subcontractor).
- 2) Employees Working in More Than One Classification. A contractor may fail to record on the payroll in cases where an employee works in more than one classification for any meaningful period of time (1/2-hour increments or more) with varying wage and fringe benefit scales.

112.12 Semiannual Labor Compliance Enforcement Report. FHWA requires the Department to file a labor compliance activities summary report using the FHWA-1494 form two times annually for the periods of 10/1 to 3/31 and 4/1 to 9/30.

Each residency will compile information for federal-aid projects under its jurisdiction for the reporting periods and must submit the report(s) to the Construction/Materials Section. Completely fill out all lines in the report.

The Construction/Materials Section must receive the residency report(s) by no later than the end of the first full week following the end of the reporting period.

The Construction/Materials Section will compile the supplied information and submit a statewide report to USDOL with a copy provided to the FHWA Idaho Division.

Certified Payroll Review Checklist. The following is a checklist to use when checking a contractor's payroll:

- 1) Is the project number on the payroll?
- 2) Does the payroll show the payroll period covered?
- 3) Is the employee's full name shown?
- 4) Are classifications complete and in accordance with the contract wage decision?
- 5) From your knowledge, are workers properly classified for work performed?
- 6) If codes are used for classifications, has a copy of the codes been submitted?
- 7) From your knowledge, are all hours worked each day shown on the payroll?
- 8) Has the Work Hours Standard Act been complied with, as to payment of wages for work, in excess of 40 hours a week?
- 9) Are wage rates at least equal to those in the contract wage decision?
- 10) Are fringe benefits paid as required by the contract wage decision?
- 11) Does the payroll show net wages paid?
- 12) Are all deductions allowable or authorized?
- 13) Are all apprentices and trainees in an approved program, and is their status shown?
- 14) Is the payroll mathematically correct?
- 15) Does the payroll include the required statement of compliance?
- 16) Has the certified payroll been submitted within one week following the end of the work covered by the payroll?
- 17) The employees address is **not** to be shown on the payroll.
- 18) The Social Security Number is **not** to be shown on the payroll.

Example Employee Letter

[Current Date]

Mr. or Ms. _____

RE: [Project Number]; [Key Number]
[Project Name]; Request for Labor Compliance Information

Dear Mr. or Ms. _____:

This office is responsible for assuring that employees of contractors engaged in highway construction are paid in accordance with the contract for all hours worked. The purpose of this letter is to ascertain whether you are receiving the proper pay for your work classification and for all hours worked.

This inquiry is being sent to you, rather than conducted on the project site, to ensure your anonymity. Information received regarding this matter is considered confidential and your identity will not be disclosed to the employer without your written consent.

We would appreciate you answering to the best of your knowledge the attached questions and return your answers to us. Please use additional sheets if necessary and reference your responses to the numbers on the attachment.

If we do not receive a reply from you within 30 days from the date of this letter, we will consider that you are satisfied that the payments made to you are correct.

Sincerely,

Resident Engineer

Attachment:

Figure 112.11.01

[Project Number]; [Key Number] [Project Name]
Request for Labor Compliance Information Attachment

The payroll records indicate you were employed by (name and address of company) on the above referenced project from (date) through (date). The records indicate you were employed as a (work classification). The contract wages and fringe benefits for this work classification are (wage and fringe benefit rates)

- 1) Please indicate your work duties and tools used: _____

- 2) Were you being paid the contract wage and fringe benefit rates? ___ If no, what were the rates? ___

- 3) Were you paid at the rate of time and one-half, for all hours worked in excess of 40 hours per week? ___
- 4) If no, how many hours were you underpaid and on what dates? _____

- 5) Did the contractor require you to return payments (i.e., kickbacks)? _ If yes, how much and on what dates? _____

- 6) What evidence do you have to substantiate underpayments or kickbacks (e.g., time cards, check stubs, diaries, cancelled checks)? _____

- 7) What was the normal starting time for each day? _____
- 8) How much time were you allowed for lunch? _____
- 9) Did you ever complain about underpayments or kickbacks? ___ If yes, to whom and what action was taken? _____

- 10) Do you have anything further to add? _____

Name: _____
Address: _____
Phone: _____

Signature: _____
Date: _____

Figure 112.11.01