

EXHIBIT 6-K

INSTRUCTIONS FOR CONDUCTING EMPLOYEE INTERVIEWS

- A. The foreman or construction supervisor should be notified in advance of the time of the employee interviews as a courtesy and try to schedule interviews at a time that will not disrupt key work activities.
- B. The person performing interviews should be knowledgeable of labor standards procedures.
- C. Number of employees interviewed should be:
 - 1. Sufficient in number to establish the degree of accuracy of the records (*10% or greater*); and
 - 2. Representative of all classifications of employees on the project over the term of the project (at least one in each job classification).
- D. Place of Interview could be:
 - 1. On the job site, if it can be conducted properly and privately (this is a one-on-one process);
 - 2. At the employee's home;
 - 3. At the agency's office; or
 - 4. By mail
- E. The interviewer should observe duties of the workers on the job site before initiating any interviews.
- F. To initiate the interview, interviewers should:
 - 1. Properly identify themselves;
 - 2. Clearly state the purpose of interview; and
 - 3. Advise the worker that the information given is confidential, and that their identity will be disclosed to the employer only with the employee's written permission.
- G. Employee interviews are to be recorded on form HUD-11 or equivalent format. The interviewer should pay particular attention to:
 - 1. The employer's actual name and not just the name of a first line supervisor;
 - 2. The employee's full name;
 - 3. The employee's permanent mailing address;

4. The last date the individual worked on the project and number of hours worked that day
(The interviewer should make it clear that these questions solely relate to work on this project and not other work.);
5. The hourly rate of pay;
 - a. Determine if the worker is being paid at least the minimum required by the proper wage decision;
 - b. Be sure the worker is not quoting the "net" hourly rate; and
 - c. If it appears the individual may be underpaid, closely question the worker, ask for any records, and arrange to re-interview the employer.
6. Enter the worker's statement of his classification, but not a nickname for the trade;
7. The duties and tools used. If the worker's statements and the observation made by the interviewer indicate that this individual is performing under the correct job classification, the word "trade" may be entered across both items.
8. Any comments that seem necessary or pertinent; and
9. The exact date the interview took place.
- H. **The designated payroll examiner then will check the information on the Employee Interview Form HUD-11, against the payroll submitted for the same date as the interview:**
 1. If no discrepancies appear "None" should be written in the "comments" space;
 2. If discrepancies do appear, appropriate action should be initiated; and
 3. When necessary action has been completed, the results are also noted on the same interview form.
- I. **The interviewer and payroll examiner will identify and correct any discrepancies between on-site interviews, payrolls and the wage decision.**

Supplemental Instructions for Conducting Employee Interviews

These supplemental instructions are provided with the sample of a completed Record of Employee Interview, form HUD-11, and pages from an actual general wage decision to aid your understanding of the interview process, and to illustrate how to find the appropriate wage rate based on the sample interview.

The sample employee interview form presents an interview of a person working on landscape improvements in conjunction with a CDBG-assisted water system project in a hypothetical Montana community called Sunrise.

In using the form, the interviewer (the grantee's labor standards officer) completed the information on lines #1 through #12 on the day of the interview, which was August 8, 1997. When the weekly payroll report #4, which covered the day of the interview, was received from XYZ Landscaping Company, the interviewer compared the contractor's payroll information with the information given by the employee, John Doe. The payroll report showed this employee was paid \$14.29 per hour base rate (plus \$.65 per hour for Zone 2 pay, for a total of \$14.94 per hour base pay) and \$3.80 per hour fringe benefit as a landscaper. The interviewer, after finding the wage rate matched those provided in the construction contract, then showed this as verified in the remarks section (#13) and would sign and date the form (#14).

To determine if this was the appropriate wage paid by the contractor to this employee, the following steps were used to find the prevailing wage rate for a landscaper:

1. Determine the applicable job classification (e.g., landscaper as given by the employee and by observation of his duties as recorded on page 6-K.5, sample of completed interview form).
2. Locate the federal Davis-Bacon Wage Rate Decision applicable to this construction contract. (For purposes of illustration, only the title page and two other applicable page were used for this review, beginning on page 6-K.6. The full decision, MT960001, consisted of 13 pages, from page MT960001-1 through page MT960001-13).
3. Locate on this decision the "basic" job classification (e.g., Laborers as listed on page 6-K.8).
4. Determine which "group" of laborers is appropriate (e.g., Landscaper is listed under Group 2 on page 6-K.8).
5. Determine which "zone hourly rate" (if any) is appropriate for this worker. (Note: Sunrise, MT is located 20 miles on I-90 from one of the communities listed on page 6-K.7).
6. Locate the appropriate wage rate for this classification -- e.g., for Group 2/ Zone 2, \$14.29 for base hourly rate (plus an additional \$0.65 hourly for Zone 2 hourly pay for a total of \$14.94 hourly base rate) and \$3.80 for fringe benefit on page 6-K.8