

Stakeholder Feedback Questions (responses in bold)

A. Documentation

1. Is the Certified Transcript of Payroll (CTP) the appropriate documentation to request as proof that prevailing wage was paid? If not, what forms of documentation should be provided to verify prevailing wage was paid?

Yes – CTPs should be filed on a monthly basis, no later than the 15th of each month. 820 ILCS 130/5. In addition, the Prevailing Wage Act requires payment of fringe benefits at the prevailing rates. The IDOL maintains a Fringe Benefits Affidavit that should be completed along with the CTP.

B. Verification

1. How can the Program Administrator confirm prevailing wages were paid on 100% of the project construction and not only for the CTPs submitted?

The Approved Vendor should provide to the Program Administrator the date construction begins, together with a list of all contractors and subcontracts that will be performing the work in question. The information provided should also include the scope of work to be performed by each. This will help verify that all work is being included in CTPs. Additionally, a “no work report” must be submitted for any weeks during which no work was performed. If there is any question as to whether employees or hours of work are being excluded from CTPs, full payroll records and work logs can be requested.

2. What would be reasonable benchmark hours of construction labor per kW of installed capacity to use, and how would those vary by project size and type?

While using an industry average number of labor hours per system installed or per kW of capacity as a guideline, these guidelines can deviate greatly depending on the size, scope and nature of the work being performed.

3. How should the Program Administrator verify that workers were properly classified in the CTPs?

The scope of work description would identify the type of work to be performed and general information to assist in evaluating the general classifications that workers should be paid under. If there is any specific questions or instances of misclassification of employees, those questions and/or claims should be referred to IDOL.

4. Are there any other best practices for CTP verification that the Program Administrator should use for verification of prevailing wage requirements?

Monthly confirmation that CTPs and Fringe Benefit Affidavits have been submitted for all open projects.

5. The law requires that *“It shall also be mandatory upon the contractor to whom the contract is awarded to insert into each subcontract and into the project specifications for each subcontract a written stipulation to the effect that not less than the prevailing rate of wages shall be paid to all laborers, workers, and mechanics performing work under the contract.”*

Should all contractors using subcontractors provide a copy of their contracts for the Program Administrator to verify this language for all of a project’s subcontracts is in place, or would an attestation that this requirement has been met be acceptable (with the provision that the Program Administrator could request documentation for verification as needed)?

It would be best practice to automatically require copies of subcontracts and project specifications to be submitted in all instances. If this would create a substantial administrative burden, then the second option should suffice.