

# Stage-Type Inspections (STI) Reporting for Contractors



#### **PURPOSE**

- Monitoring tool that provides an overview of contractor compliance with EEO requirements on federal-aid projects.
- May assist in determining which contractors will be selected for an "EEO Contract Compliance Review".
- Identifies concerns that need to be addressed in order to assist the contractor in complying with EEO requirements.

#### Who should conduct the STI?

- The RCE/Consultant will initiate the STI process with the <u>prime</u> contractor.
- The prime contractor is responsible for completing and submitting the STI form (including subcontractor), along with supportive documentation to the RCE.

#### When should the STI be conducted?

- Project contract dollar value reaches 25%
  - For relatively short projects (6 months or less), the STI will be initiated by the RCE as soon as construction work begins.

#### Who needs to be reviewed?

- The prime contractor on <u>every</u> federal aid project with a contract dollar value of \$10,000 or more.
- All subcontractors <u>actively</u> working during the 2 weeks after the STI process is initiated with the prime contractor, IF
  - Subcontract dollar value is \$10,000 or more AND
  - Work on-site (excluding haulers, surveyors, or material testers/suppliers).

#### New STI Form – Home Office (Effective September 2021)

SCE	T	Equal Employment Opportunity Stage-Type Inspection Home Office Revised 09/21											
Local SCDOT Construction Office completes #1-5 and sends to Contractor's home office.													
1. Name, address, ph	one number of	2. SC File I	ocontract										
4. Percent complete	based on contr	5. Type of work for this contractor											
Contractor's home office completes #6-21 and returns form to the local SCDOT Construction Office.  NOTE: "you / your" = the contractor named in #1 above.													
6. Your start date	7. Your estin	nated	8. Your expects employment	ed peak	9. N	lame and title of l Officer							
10. Name & title of Project Officer 11. You are Prime contractor First-tier subcontractor Other (specify)													
12. You are (check all that spoky) Minority Enterprise (at least 51% owned by minority) Non-minority SCDOT certified DBE													
13. Do you maintain records to document compliance with the federal EEO requirements? (i.e., recruitment, applicants, terminations, promotions, training, etc.) Records should be maintained and available for inspection at least three (3) years after final payment is made to the contractor.													
14. Has your EEO policy been disseminated to all your employees on this project and to other appropriate persons related to this project? If YES, provide copy of your EEO policy and documentation such as employee acknowledgement form, minutes & sign-in sheets from EEO meetings.													
15. Has the EEO Officer held EEO meetings for SUPERVISORY and PERSONNEL OFFICE employees at the START of this project AND not less often than once every 6 months since the project began?  If YES, provide minutes and sign-in sheets for the meeting held 30 days before or after your work start date.  If NO, give date(s) of scheduled meeting(s).													
16. Have you hired new employees since work began on this project?  If NO, go directly to #17.  If YES, state how many and answer the questions below:													
Are any of these new employees working on THIS construction project? If YES, how many?													
What job openings/classifications were available for hiring opportunities on this project?													
Were women and minority recruitment sources used to recruit these new employees on this project? If YES, please provide documentation i.e., vacancy letters, telephone logs, ads, etc.													
17. Has the EEO Officer (or trained designee) conducted EEO inspection(s) on this project?  o If YES, provide documentation (e.g., Jobsite Inspection Forms).  o If NO, give date visit is scheduled to be made:													
<ol> <li>Have your employees on this project been encouraged to refer qualified minority and women to your firm? If YES, provide documentation.</li> </ol>													

JCDQ1		,					,		, -	JF.									-9-		
19. Identify most recent pay period that you had employees on this construction site.																					
Week-ending(Please attach copy of certified payroll for this time period)																					
<ol> <li>In the modified PR-1391 below, record ONLY employees on THIS project based upon the payroll submitted in #19. (If using electronic form double click in the chart to open up a self-calculating excel spread sheet.)</li> </ol>																					
Job Categories	Total Employees		Female Percent			Mnority Percent	Black or African American		Hispanic or Latino		American Indian or Alaskan Native		Asian		Native Hawalian or Other Pacific Islander		Two or More Races		White		
	М	F		М	F		М	F	М	F	М	F	М	F	М	F	М	F	М	F	
Clerical-field office only																					
Equipment Operators																					
Mechanics																					
Truck Drivers																					
Ironworkers																					
Carpenters																					
Cement Masons																					
Electrician																					
Pipefitters / Plumbers																					
Painters																					
Laborers, Semi-skilled																					
Laborers, Unskilled																					
Total																					
			_	_					_				_		_						
21. How are employees made aware of available training opportunities on this project? Please provide appropriate documentation such as discussion during EEO meetings, Training Notices, etc. Training involves any type of certification(s), informal on-the-job training, and/or training in fulfillment of Training Special Provision requirements, if applicable.																					
Contractor's EEO	Offi	сег:	Sign	n and	sen	d for	n and	l att	achn	nent	s to	the l	ocal	SCI	DOT	Con	struc	etion	Office	<u>.</u>	
22. My signature verifies that all information submitted with this form is accurate and complete.																					
Name Date																					
Local SCDOT Construction Office: Attach interviews, sign, and forward Stage-Type Inspection to Office of Civil Rights Programs.																					
23. My signature verifies I reviewed this report for completeness and our office conducted the interviews.																					
Name Title Date																					
																					_

## $\bigcirc$

### Stage-Type Inspections

#### **Contractor Responsibilities**

- Home Office
  - RCE will complete items 1-5.
  - Contractors will complete items 6 21 in ink.
  - Prime contractor must forward Home Office forms to applicable subcontractors <u>immediately</u> upon receipt.
  - Prime contractor is responsible for ensuring that all applicable subcontractors return completed Home Office forms and documentation in a timely manner.
  - Be sure to answer all questions <u>completely</u>, sign and date the STI.
  - Attach the appropriate supportive documentation.
  - Retain a copy of the STI and all documentation for your records.
  - <u>All</u> Home Office forms should be submitted to the RCE <u>within</u> ten (10) calendar days of receipt.

#### **Supportive Documentation**

- Complete items 6-12.
- Item #13 <u>Maintaining Records</u> EEO documents/records must be maintained for at least three (3) years after receipt of final payment.
- Item #14 <u>EEO Policy Distribution</u> Copy of EEO policy and verification of EEO policy dissemination (i.e., signed acknowledgement forms, minutes and sign-in sheets from EEO meetings, or other appropriate means).
- Item #15 <u>EEO Meetings</u> Copy of minutes and sign-in sheets from EEO meetings held before the start of work on a project (30 days before or after the project work start date) and at least once every six (6) months.

Additional documentation may be requested if the initial information submitted is not satisfactory and/or corrective action is needed.

#### **Supportive Documentation (continued)**

- Item #16 <u>Recruitment If hiring opportunities exist</u> Copy of sources used to recruit new employees, vacancy letters, communication log documenting the results from follow-ups conducted as demonstration of good faith efforts.
- Item #17 <u>Site Inspections</u> Copy of all monthly site inspections conducted since work began on the project.
  - Prime and subcontractors are responsible for conducting site inspections.
  - During months of inactivity, simply indicate on the site inspection form that no work was performed during the specified month.
  - For extremely short projects, a site inspection should be conducted within the first few days or weeks on the project.
- Item #18 <u>Employee Referrals</u> Copy of documentation verifying current employees are encouraged to make referrals of qualified women and minorities for employment.

Additional documentation may be requested if the initial information submitted is not satisfactory and/or corrective action is needed.

#### Supportive Documentation (continued)

- Item #19 <u>Certified Payroll</u> Copy of the certified payroll for the most recent pay period contractor had employees actively working on the construction site.
  - Please ensure the Race, Gender, and Job Classification are listed for each employee.
- Item #20 Modified PR-1391 Project Information Complete data based upon the certified payroll submitted in #19.
- Item #21 <u>Training</u> Copy of documentation verifying discussion of training opportunities on the project (i.e., minutes and sign-in sheets from EEO meetings, training notices and other appropriate means).

Additional documentation may be requested if the initial information submitted is not satisfactory and/or corrective action is needed.

#### **Employee Interviews**

- Conducted by the RCE and/or a designated SCDOT employee
  - Confidential
- Cross section of the firm's employees will be interviewed
  - Race
  - Gender
  - Job classification
- Contractor must inform employees that interviews will be conducted so that they are comfortable talking to SCDOT personnel and/or consultants.
- The Office of Civil Rights Programs will be notified immediately of any alleged complaints of discrimination.

#### **External EO Unit Responsibilities**

- Review STI
- Note areas of deficiency
- Attempt to resolve deficiencies prior to generating monthly FHWA report
  - Prime Contractor (including relevant subcontractors) notified of <u>all</u> deficiencies via email
  - Response and/or corrective action needed within two (2) calendar days
  - All unresolved deficiencies will be included as part of the monthly FHWA report

#### **External EO Unit Responsibilities (continued)**

- Contractor STI report
  - Identification of unresolved deficiencies and corrective action needed.
  - Thirty-five (35) calendar day deadline for date of report
  - Copy of report provided to RCE/Consultant/DEA
  - If non-responsive and/or issues are unsatisfactorily resolved, monthly/final pay estimate may be withheld

#### STI Report – Contractor

# Respond to each item listed in this section.

#### **Sample**

Stage-Type Inspection Report SC File No: 0000000

#### **Prime Contractor**

Contractor: Doelon Construction Company

EEO Officer: Jane Doe
Address: PO Box 000

City: Doeville State: SC ZIP: 00000-0000

Date Contractor signed Stage Type 00/00/0000 Value of \$000,000.00

#### Highlights from Employee Interviews - NO RESPONSE REQUIRED TO ITEMS IN THIS SECTION

# Employees not familiar with EEO: 0
# Employees unable to identify EEO Officer: 0
# Employees say not asked to refer F/M: 0
# Employees say training/promotions not offered fairly: 0
# Employees with complaints of discrimination: 0

Total Number of Employees Interviewed: 0

ATTENTION: PLEASE ONLY ADDRESS ITEMS LISTED IN THE SECTION BELOW IF APPLICABLE.

Special Concerns That Need To Be Addressed

Please provide the minutes and the sign-in sheet for the EEO Meeting held at the start of this project.

#### STI Report – Contractor

If there are no concerns, a response is not necessary.

#### **Sample**

Stage-Type Inspection Report SC File No: 0000000

#### **Prime Contractor**

Contractor: Doelon Construction Company

EEO Officer: Jane Doe
Address: PO Box 000

City: Doeville State: SC ZIP: 00000-0000

Date Contractor signed Stage Type 00/00/0000 Value of \$000,000.00

#### <u>Highlights from Employee Interviews - NO RESPONSE REQUIRED TO ITEMS IN THIS SECTION</u>

# Employees not familiar with EEO:

# Employees unable to identify EEO Officer:

# Employees say not asked to refer F/M:

# Employees say training/promotions not offered fairly:

# Employees with complaints of discrimination:

Total Number of Employees Interviewed:

0

ATTENTION: PLEASE ONLY ADDRESS ITEMS LISTED IN THE SECTION BELOW IF APPLICABLE.

Special Concerns That Need To Be Addressed

NO CONCERNS. Thank you!! - NO RESPONSE REQUIRED.

#### External EO Unit Responsibilities (continued)

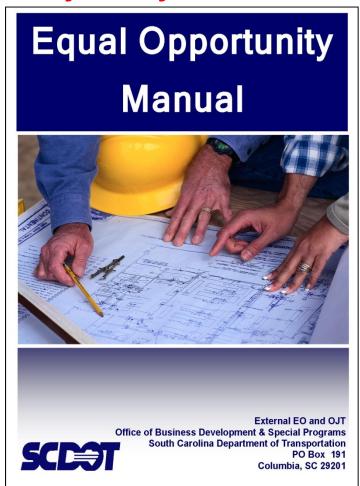
Evaluate follow-up responses

## It is important to respond in a timely manner.

 E-mail letter to the prime contractor stating all concerns are resolved

Documentation is very important! Feel free to email any questions you may have.

Please reference the <u>SCDOT</u> <u>EEO Manual</u>



https://www.scdot.org/business/pdf/businessDevelop/EO\_manual.pdf

#### Conclusion

Thank you for your participation.

Please be sure to contact the <u>EEO Program Coordinator</u> at (803) 737-6049 if you have any questions.