Stage-Type Inspections (STI) Reporting for Contractors

Office of Civil Rights Programs
South Carolina Department of Transportation
Stage-Type Inspections

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 “In-Depth Contract Compliance Review”.

• Identifies concerns that need to be addressed in order to assist the contractor in complying with EEO requirements.
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Who should conduct the STI?
  - The RCE/Consultant will initiate the STI process with the prime 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 work begins.

Who needs to be reviewed?
  - The prime contractor on every federal aid project with a contract dollar value of $10,000 or more.
  - All subcontractors actively 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 2019)

Equal Employment Opportunity
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Home Office

1. Name, address, phone number of contractor/subcontractor
2. SC File No
3. Contract/Subcontract value

4. Percent complete based on contract value
5. Type of work for this contractor

6. Your start date
7. Your estimated completion date
8. Your expected peak employment dates
9. Name and title of EEO Officer

10. Name & title of Project Officer
11. Yes or No

12. Are you (check all that apply): Minority Enterprise [at least 51% owned by minority], Non-minority, SCDOT certified DBE

13. Do you maintain records to document compliance with the federal EO requirements? (i.e. recruitment, applications, 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 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 SUPERVISING 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 COMPANY-WIDE since you 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 (e.g. vacancy letters, telephone logs, ads, etc.)

17. Has the EEO Officer (or trained designated) conducted EEO inspection(s) on this project?
   - If YES, provide documentation (e.g. Job site Inspection Forms).
   - If NO, give date visit is scheduled to be made: ____________

18. Have your employees on this project been encouraged to refer qualified minority and women to your firm? If YES, provide documentation.

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Contractor’s EEO Officer: Sign and send form and attachments to the local SCDOT Construction Office.

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 interview.
   Name: ____________________________
   Title: ____________________________
   Date: ____________
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 immediately 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 **completely**, sign and date the STI.
  - Attach the appropriate supportive documentation.
  - Retain a copy of the STI and all documentation for your records.
  - **All** Home Office forms should be submitted to the RCE within ten (10) calendar days of receipt.
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**Supportive Documentation**

- Complete items 6-12.

- Item #13 – *Maintaining Records* - EEO documents/records must be maintained for at least three (3) years after receipt of final payment.

- Item #14 - *EEO Policy Distribution* - 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 – *EEO Meetings* – 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.

You may be requested to provide additional documentation if the initial information submitted is not satisfactory and/or corrective action is needed.
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Supportive Documentation (continued)

- Item #16 – Recruitment – If hiring opportunities exist - 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 – Site Inspections – 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 – Employee Referrals – Copy of documentation verifying current employees are encouraged to make referrals of qualified women and minorities for employment.

You may be requested to provide additional documentation if the initial information submitted is not satisfactory and/or corrective action is needed.
Supportive Documentation (continued)

- Item #19 – Certified Payroll – 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 – Training - 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).

You may be requested to provide additional documentation if the initial information submitted is not satisfactory and/or corrective action is needed.
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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 notified of all deficiencies (including relevant subcontractors) via e-mail
  - 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
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STI Report – Contractor

Respond to each item listed in this section.

Sample

Stage-Type Inspection Report

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

SC File No: 0000000

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.
If there are no concerns, a response is not necessary.
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External EO Unit Responsibilities (continued)

- Evaluate follow-up responses

   It is important to respond in a timely manner.

- Mail letter stating all concerns are resolved to the prime contractor
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Documentation is very important!
Feel free to email any questions you may have.

Please reference the SCDOT EEO Manual