



# LPA STAGE-TYPE INSPECTION

## For LPA Projects Only

Review Authority: 23 CFR 230 and FHWA Form 1273

The LPA Compliance Officer (defined as the person employed by the LPA to ensure Equal Opportunity Compliance)/Consultant is responsible for completing this form by scheduling an on-site meeting with the prime contractor in order to verify supportive documentation in response to each question on pages 2-3 of this form. For additional information, please refer to <http://www.scdot.org/doing/lpa.shtml>.

### REVIEW INFORMATION

|                       |                   |           |                   |
|-----------------------|-------------------|-----------|-------------------|
| 1. Federal Aid Number | 2. SC File Number | 3. County | 4. Date of Review |
|-----------------------|-------------------|-----------|-------------------|

### CONTRACTOR INFORMATION

|  |   |   |  |
|--|---|---|--|
| 5. Name, Address, Telephone Number of Contractor's Home Office   | 6. Name and Title of EEO Officer  |   |  |
| 7. Contractor Identification:<br><input type="checkbox"/> Prime contractor<br><input type="checkbox"/> Other (specify _____) | 8. Is contractor a Certified DBE?<br><input type="checkbox"/> Yes <input type="checkbox"/> No | 9. Name and Title of DBE Liaison<br><b>(Required only if you subcontract to DBEs)</b> |  |
| 10. Project Address  |   | 11. Name and Title of Project Supervisor  |  |

### PROJECT INFORMATION

|  |  |   |  |
|--|--|---|--|
| 12. Type of Construction: <input type="checkbox"/> Highway <input type="checkbox"/> Bridge <input type="checkbox"/> Landscaping <input type="checkbox"/> Other (Specify _____) |  |   |  |
| 13. Contract Dollar Value _____  |  | 14. Type of Work Performed _____  |  |
| 15. Does the contractor maintain a branch office at this project site?<br><input type="checkbox"/> Yes<br><input type="checkbox"/> No  |  | 16. Do project personnel have a central meeting place on site?<br><input type="checkbox"/> Yes (Specify _____)<br><input type="checkbox"/> No |  |
| 17. Percent Completed (Based on Dollar Amount) _____   |  | 18. Work Start Date _____   |  |
| 19. Anticipated Peak Employment Dates _____  |  | 20. Estimated Completion Date _____   |  |

### SIGNATURE OF LPA COMPLIANCE OFFICER

"My signature below indicates that, to the best of my knowledge, the information submitted in and with this form is accurate. I understand that any falsification with these submittals may result in a finding of 'non-compliance' with federal equal opportunity requirements."

\_\_\_\_\_  
Name of LPA Compliance Officer (Required)

\_\_\_\_\_  
Title of LPA Compliance Officer (Required)

\_\_\_\_\_  
Signature of LPA Compliance Officer (Required)

\_\_\_\_\_  
Date

### SIGNATURE OF CONSULTANT (IF APPLICABLE)

(The following signature is applicable only if the LPA Stage-Type Inspection is completed by someone other than the LPA Compliance Officer)  
"My signature below indicates that, to the best of my knowledge, the information submitted in and with this form is accurate. I understand that any falsification with these submittals may result in a finding of 'non-compliance' with federal equal opportunity requirements."

\_\_\_\_\_  
Name of Consultant Representative

\_\_\_\_\_  
Title of Consultant Representative

\_\_\_\_\_  
Consultant/Company Name

\_\_\_\_\_  
Signature of Consultant Representative

\_\_\_\_\_  
Date

## EQUAL OPPORTUNITY AWARENESS

| Yes | No | Issues to address  |
|-----|----|--|
|     |    | 21. Does the company have an EEO Policy and is it displayed conspicuously at the contractor's home office? <u>If YES, review EEO policy to ensure required verbiage listed in the FHWA Form 1273 (Section II Nondiscrimination 1.b.) is included. If NO, corrective action is needed.</u>  |
|     |    | 22. Has the Contractor's EEO Policy and Procedure to implement such policy been explained to ALL employees? By what means? <u>If YES, review minutes and sign-in sheets or other appropriate documentation to ensure compliance. If NO, corrective action is needed.</u>   |
|     |    | 23. Have employees been advised of their right to file a complaint of discrimination and the appropriate person(s) with whom to file that complaint? <u>If YES, review procedures and ensure that contact information for all other applicable agencies responsible for investigating complaints of discrimination are included. If NO, corrective action is needed.</u>   |
|     |    | 24. Is the prescribed "Equal Opportunity Employer" clause included in the employee applications? <u>If YES, review application to ensure compliance. If NO, corrective action is needed.</u>   |
|     |    | 25. Have EEO meetings of SUPERVISORY (i.e., project managers, superintendents, foremen) and PERSONNEL OFFICE employees (i.e. Human Resource Department) been conducted at the BEGINNING (30 days before or after work start date) of the project and every 6 months thereafter? <u>If YES, review a copy of minutes and sign-in sheet(s) for each meeting, including the title of each person in attendance. If NO, corrective action is needed.</u> |

## RECRUITMENT / APPLICANTS / HIRING

| Yes | No | Issues to address   |
|-----|----|---|
|     |    | 26. Has contractor hired new employees since work began on this project? <u>If NO, go to question 32.</u>   |
|     |    | 27. Do advertisements for this project include the phrase "An Equal Opportunity Employer"? <u>If YES, review advertisements to ensure compliance. If NO, corrective action is needed.</u>   |
|     |    | 28. Has the contractor recruited through public and private sources that refer minorities? <u>If YES, review copies of relevant correspondence(s) since the start of this project. If NO, corrective action is needed.</u>  |
|     |    | 29. Has the contractor recruited through public and private sources that refer women? <u>If YES, review copies of relevant correspondence(s) since the start of this project. If NO, corrective action is needed.</u>   |
|     |    | 30. Does the firm encourage present employees to refer minority and women applicants? <u>If YES, request that contractor identify methods used and review appropriate documentation. If NO, corrective action is needed.</u>  |
|     |    | 31. Does the contractor keep a listing of all women and minority applicants and the final disposition of each? <u>If YES, review information for evidence of discrimination and ensure the following information is included: Date Received, Name/Address/Phone, Race, Gender, Position Applied for, Recruitment Source, and Final Disposition. If NO, corrective action is needed.</u> |

## TRAINING AND PROMOTION

| Yes | No | Issues to address  |
|-----|----|--|
|     |    | 32. Are there any available training opportunities on this project? <u>If NO, go to question 35.</u>   |
|     |    | 33. Does the contractor advise ALL project employees of training opportunities, if available? <u>If YES, request that contractor identify methods used for informing employees of available training and the process used for selecting persons to receive training. If NO, corrective action is needed.</u> |
|     |    | 34. Does contractor maintain and periodically review training records to determine if there is any evidence of discrimination? <u>If YES, review appropriate documentation. If NO, corrective action is needed.</u>  |
|     |    | 35. Are there any promotional opportunities on this project? <u>If NO, go to question 37.</u>  |

|  |  |  |
|--|--|--|
|  |  | 36. Does the contractor maintain a list of employee promotions and raises for this project? <u>If YES, review information for evidence of discrimination and ensure the following information is included: Date, Name, Race, Gender, Old and New Pay Rate, and Reason for Promotion/Raise. If NO, corrective action is needed.</u> |
|--|--|--|

### WAGE EVALUATIONS

| Yes | No | Issues to address  |
|-----|----|--|
|     |    | 37. Please request that the contractor submit a copy of the certified payroll for the most recent pay period. Contractor also needs to provide the following information: Employee Name, Race, Gender, Salary, Job Classification and Years of Service. <u>Verify information for accuracy and review for potential evidence of discrimination. If potential evidence of discrimination is found, immediately contact the Division of Minority and Small Business Affairs for additional guidance.</u> |
|     |    | 38. Does the Contractor periodically evaluate the spread of wages paid within each classification to determine any evidence of discriminatory wage practices? <u>If YES, request contractor state how often evaluations are conducted and request documentation indicating the results of the most recent evaluation. If NO, corrective action is needed.</u>  |

### OTHER PERSONNEL ACTIONS

| Yes | No | Issues to address  |
|-----|----|--|
|     |    | 39. Has the Contractor conducted periodic reviews of any other personnel actions (i.e. applicants, new hires, terminations, raises/promotions, etc.) to determine whether there is evidence of discrimination? <u>If YES, request contractor identify which personnel actions are reviewed, the frequency of these reviews, and the results of the most recent evaluation. If NO, corrective action is needed.</u> |
|     |    | 40. Are there any terminations for this project? <u>If NO, go to question 42.</u>  |
|     |    | 41. Does the contractor maintain a list of employee terminations for this project? <u>If YES, review information for evidence of discrimination and ensure the following information is included: Date, Name, Race, Gender, and Reason for Termination. If NO, corrective action is needed.</u>  |

### SUB-CONTRACTORS / VENDORS / MATERIAL SUPPLIERS INFORMATION

| Yes | No | Issues to address  |
|-----|----|--|
|     |    | 42. Does contractor attach the FHWA Form 1273 to all subcontract agreements with a contract value of \$10,000 or more? <u>If YES, review all applicable information for verification purposes. If NO, corrective action is needed.</u> |

### CONSTRUCTION SITE

| Yes | No | Issues to address   |
|-----|----|---|
|     |    | 43. Are the eighteen (18) required posters and EEO policies of all active subcontractors conspicuously displayed on the construction site in a location that is visible to the general public? <u>If YES, review all applicable information for verification purposes. If NO, corrective action is needed.</u>                                      |
|     |    | 44. Is the "General Decision" (minimum wage requirements in the contract) posted on the construction site? <u>If NO, corrective action is needed.</u>   |
|     |    | 45. Has the company EEO Officer (or trained designee) conducted periodic inspections of the project site to ensure that working conditions and employee facilities do not indicate discriminatory treatment of construction-site personnel? <u>If YES, review appropriate documentation, including results. If NO, corrective action is needed.</u> |

**Please Note: Confidential Employee Interviews and a Project Site Inspection Form must be submitted along with the LPA Stage-Type Inspection Form. Copies of these forms may be requested from the Office of Civil Rights by phone at 803-737-6361 or by e-mail at [Beaglesbd@scdot.org](mailto:Beaglesbd@scdot.org).**