



INTERVIEW GUIDANCE FOR SRF PROJECTS

INTERVIEWER: Each SRF loan recipient is required to use a consulting engineer or the firm's staff, public works director, or someone else unaffiliated with the contractors to conduct interviews.

FREQUENCY AND TIMING OF INTERVIEWS: Interview at least one person from every contractor and subcontractor to get a representative sample of all trades. EPA Award Terms and Conditions require that employee interviews be conducted with a representative group of covered employees at least twice; once within the first two weeks of each contractor or subcontractor's submission of its initial weekly payroll data and two weeks prior to the estimated completion date for the contract or subcontract. Perform additional interviews with contractors when issues or discrepancies are flagged.

RED FLAGS: Assistance recipients should be aware of the following "red flags" during employee interviews:

- Employees who refuse to participate in the interview
- Employees who state their job type as different than the class assigned in the certified payrolls submitted to date (or are observed doing different work)
- Employees not listed on the payroll records for the day of the interview
- Any discrepancy between the wage rate stated in the interview and payroll records
- Translators employed by the contractor

*Keep in mind that employees may not know the value of their fringe Benefits

INTENT: Interviews are performed to ensure certified payrolls are accurate and workers are being classified and paid according to the applicable general wage decision. When done properly, this control aids in uncovering discrepancies between the work actually being performed and the job classification and/or wages being reported on the certified payrolls. Each interview takes about 10 minutes and is to be done confidentially to protect the workers. Once the certified payroll is turned in for the specific date the interview was done, the information must be compared to those certified payrolls to complete the process.

RECORDKEEPING: Certified payroll records and labor interviews are required to be retained by the contracting organization and contractor for three years after completion of the construction project. These project folders should be readily available for inspection by NHDES, The Environmental Protection Agency, or the Department of Labor.