



FOUNDATION FOR FAIR CONTRACTING OF CONNECTICUT, INC.

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Division of Regulations, Legislation, and Interpretation
Wage and Hour Division
U.S. Department of Labor
Room S-3502
200 Constitution Ave
Washington, D.C. 20210

August 7, 2014

Re: Proposed Extension of the Approval of Information Collection Requirements that Contractors and Subcontractors on Federal and Federally Assisted Construction Subject to Davis-Bacon Labor Standards Submit Weekly Certified Payrolls in Accordance with the Copeland Act. Control Number 1235-0008

The Foundation for Fair Contracting of Connecticut ("FFC-CT") is a labor/management organization whose purpose is to promote and monitor compliance with all laws and regulations relating to public works construction. Specifically, we focus on issues concerning prevailing wages, classification and apprenticeship standards. One of the most effective tools we utilize to assure compliance of the prevailing wage laws, including Davis-Bacon, is the collection, review and analysis of certified payroll records.

As such, the FFC-CT supports and encourages the continued use and examination of certified payroll records by the US Department of Labor ("US DOL") as a means enforcement of the Davis-Bacon Act. Collection and review of certified payroll records is necessary to enforcing compliance with wage laws.

Certified payroll records provide an accounting of what work is being completed on a public construction project and who is performing that work. Through analysis of certified payroll records, compliance authorities are able to determine if workers are being paid correct wages, are being classified properly for the work performed, and are receiving correct and accurate worker's compensation and ERISA benefits. Certified payroll records create transparency within public works projects. This is beneficial, not just to third party watch dogs like our organization, but to all public awarding authorities and enforcement agencies

Through our work in Connecticut, the FFC has been able to utilize certified payroll records as a means to bring contractors into compliance with federal wage laws and reporting requirements. In addition, the FFC-CT has worked productively alongside the US DOL's local offices to ensure that workers are receiving the proper wages and benefits owed to them. Therefore, we strongly urge the US DOL to maintain the use of certified payroll records on Davis-Bacon projects.

Cindy Dubuque, MSW
Executive Director
Foundation for Fair Contracting of CT