

**20.106**

**AIRPORT IMPROVEMENT PROGRAM**

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**State Project/Program:**     **STATE BLOCK GRANT PROGRAM (DOT 8)**  
   **COVID-19 STATE BLOCK GRANT PROGRAM**

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**U.S. Department of Transportation**

**Federal Authorization:**     **Public Law 103-272**

**North Carolina Department of Transportation**  
**Division of Aviation**

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**Agency Contact Person:**

Leah Roberts, Interim Finance & Grants Manager  
N.C. Department of Transportation  
Division of Aviation  
1560 Mail Service Center  
Raleigh, NC 27699-1560  
Phone: (919) 814-0567  
Fax: (919) 840-9267  
[lroberts@ncdot.gov](mailto:lroberts@ncdot.gov)

**Address Confirmation Letters To:**

Pam Nelms  
N.C. Department of Transportation  
Financial Management Division  
1514 Mail Service Center  
Raleigh, NC 27699-1514  
Phone: (919) 707-4245  
Fax: (919) 715-8718  
[pknelms1@ncdot.gov](mailto:pknelms1@ncdot.gov)

The auditor should not consider the Supplement to be “safe harbor” for identifying audit procedures to apply in a particular engagement, but the auditor should be prepared to justify departures from the suggested procedures. The auditor can consider the supplement a “safe harbor” for identification of compliance requirements to be tested if the auditor performs reasonable procedures to ensure that the requirements in the Supplement are current.

The grantor agency may elect to review audit working papers to determine that audit tests are adequate.

**Auditors may request documentation of monitoring visits by the State Agencies.**

This compliance supplement must be used in conjunction with the OMB 2023 Compliance Supplement which will be issued in the summer. This includes “Part 3 - Compliance Requirements,” for the types that apply, “Part 6 - Internal Control,” and “Part 4 - Agency Program” requirements if the Agency issued guidance for a specific program. The OMB Compliance Supplement is Section A of the State Compliance Supplement.

Grant Agreement must be properly identified by program name (“Airport Improvement Program”), CFDA number (“20.106”), and WBS number on the Schedule of Expenditures of Federal and State Awards. This information is available from the agreement with NCDOT on the first page. Grantor and/or pass-through grantor should also be included. On NCDOT’s confirmation from the Grant Master List (GML), these funds are shown as CFDA number 20.106.

**I. PROGRAM OBJECTIVES**

**Airport Improvement Program (AIP).** FAA’s Federal Block Grant program is used for funding airport planning and development. Under this program, FAA provides funds directly to participating states that, in turn, prioritize, select, and fund AIP projects at non-

primary airports. The participating states also perform FAA's oversight role at these airports. Legislation now allows up to ten qualified states to assume the responsibility for AIP grants to airports, except for funds designated for use at primary airports. (Advisory Circular: 150/5100-21). Since 1990, North Carolina has been one of the states that participate in this program. The objective of the Airport Improvement Program is to assist sponsors, owners, or operators of public-use airports in the development of a nationwide system of airports adequate to meet the needs of civil aeronautics. Through the State Block Grant Program, NCDOT provides the flow-through federal financial assistance from the Airport Improvement Program to local governmental units for the purpose of planning, land acquisition, construction, navigational aids, terminal buildings, parking, access roads, fuel farms, and hangars for general aviation airports and heliports that will be open to the public.

**Coronavirus Aid, Relief, and Economic Security (CARES).** The Coronavirus Aid, Relief, and Economic Security (CARES) Act (H.R. 748, Public Law 116-136) (PDF), signed into law on March 27, 2020, includes \$10 billion in funds to be awarded as economic relief to eligible U.S. airports affected by the prevention of, preparation for, and response to the COVID-19 pandemic. There were 2 block grants of CARES funding. One was for operation and maintenance and debt service for the airports only. The other CARES Act provides funds to increase the federal share to 100 percent for Airport Improvement Program (AIP) grants already planned for fiscal year 2020. Under normal circumstances, AIP grant recipients contribute a matching percentage of the project costs. Providing this additional funding and eliminating the local share will allow critical safety and capacity projects to continue as planned regardless of airport sponsors' current financial circumstances. For more information, see [https://www.faa.gov/airports/cares\\_act/](https://www.faa.gov/airports/cares_act/).

**Coronavirus Response and Relief Supplemental Appropriation Act (CRRSAA).** The Coronavirus Response and Relief Supplemental Appropriation Act (CRRSAA) (Public Law 116-260) (PDF), signed into law on December 27, 2020, includes nearly \$2 billion in funds to be awarded as economic relief to eligible U.S. airports and eligible concessions at those airports to prevent, prepare for, and respond to the coronavirus disease 2019 (COVID-19) pandemic for fiscal year 2021. CRRSAA provides funding for operation and maintenance and debt service for the airports only. For more information, see <https://www.faa.gov/airports/crrsaa/>.

**American Rescue Plan (ARPA).** The American Rescue Plan Act of 2021 (H.R. 1319, Public Law 117-2), signed into law by the President on March 11, 2021, includes \$8 billion in funds to be awarded as economic assistance to eligible U.S. airports to prevent, prepare for, and respond to the coronavirus disease 2019 (COVID-19) pandemic. There were 2 block grants of ARPA funding. One was for operation and maintenance and debt service for the airports only. These funds will provide economic relief to airports around the country affected by the COVID-19 pandemic. The other ARPA block grant provides funds to increase the federal share to 100 percent for Airport Improvement Program (AIP) grants already planned for fiscal year 2021. Under normal circumstances, AIP grant recipients contribute a matching percentage of the project costs. Providing this additional funding and eliminating the local share will allow critical safety and capacity projects to continue as planned regardless of airport sponsors' current financial circumstances. For more information, see [https://www.faa.gov/airports/airport\\_rescue\\_grants/](https://www.faa.gov/airports/airport_rescue_grants/).

### II. PROGRAM PROCEDURES

States, counties, municipalities, U.S. territories and possessions, and other public agencies, including Indian tribes or Pueblos are eligible for airport development grants if the airport on which the development is required is listed in the National Plan of Integrated Airport Systems (NPIAS). Applications for grants must be submitted to the nearest Federal Aviation Administration (FAA) Airports District Office (ADO). Primary airport sponsors must notify FAA by January 31 or another date specified in the Federal Register of their intent to apply for funds that they are entitled to under [49 USC Subtitle VII Aviation Programs](#). A reminder is published annually in the [Federal Register Pub. L. No. 97-248 \(49 USC Chapter 31\)](#) or [Federal Register Notices \(FRN\)](#). Other sponsors are encouraged to submit early in the fiscal year and to contact the appropriate FAA Airports District Office representative for any local deadlines. Sponsors must formally accept grant offers no later than September 30 for grant funds appropriated for that fiscal year.

In North Carolina, local units of government including cities, counties, and airport authorities chartered by the General Assembly are eligible for airport grants. Airports/heliports receiving funds must be identified in the North Carolina Airport System Plan (NCASP). Additionally, airports receiving grants under the State Block Grant Program must be identified in the federal National Plan of Integrated Airport Systems (NPIAS).

The State Block Grant Program is a special Federal program administered by the North Carolina Department of Transportation, which receives the federal funds for certain categories of airports in a block and allocates the grants to specific projects meeting a state-designated priority system. Currently, all federally eligible airports in North Carolina participate in the State Block Grant Program except airports classified by the Federal Aviation Administration as Primary Commercial Service Airports (49 USC 47102(11)). These latter airports continue to work directly with FAA for project administration (under the Airport Improvement Program) but often have State supplemental funds approved to assist in the non-federal share of project costs. All airports eligible for State Block Grants must have their grants administered through the North Carolina Department of Transportation (NCDOT) and cannot opt to work directly with the Federal Aviation Administration. The NCDOT through the Division of Aviation is responsible for determining which airports will receive federal funds for various eligible projects. The application, approval, and grant management for Block Grants is identical to that of the State Airport Aid. The State Aid to Airports Program is the program providing State funds on a local matching formula basis. The final share is stipulated by the North Carolina Department of Transportation (NCDOT) and depends upon the size of the airport, the location of the airport, and the category of project. Additional grants are made by the North Carolina Department of Transportation as part of the annual State Transportation Improvement Program (STIP). All project requests must be submitted to the Department of Transportation Division of Aviation (DoA) or designee. The requests are currently submitted via a web-based software portal (EBS/Partner Connect). These requests are reviewed and prioritized prior to approval by the Aviation Director with final approval by the Office of the Secretary of Transportation. In addition, if funds are available later, grants may be made for new or expanded projects later in the year. (Non-Primary Entitlement (NPE) projects do not require approval of the Secretary of Transportation.) The State must adhere to both the FAA/DoA Block Grant Memorandum of Agreement and the FAA's Assurance for the [Aviation Block Grant Program](#).

### III. COMPLIANCE REQUIREMENTS

Below on the matrix are the types of compliance requirements are applicable to the federal program, noted as “Y,” as determined by the federal granting agency if the federal program is listed in Part 2 of the OMB 2023 Compliance Supplement. A State agency may have added a Type. If the program is not listed in Part 2, the State Agency has determined the applicable Types. If a Type, applicable by OMB, does not apply at the local level or if the State has modified the federal requirements at the local level, this should be explained in the supplement under the Type. A Type that is not applicable at the local level is noted by “N.”

If a particular Type is noted as “Y,” the auditor must determine if the Type has a direct and material effect on the federal program for the auditee. For each Type of compliance requirement, the auditor must use the OMB 2023 Compliance Supplement, Part 3 (which includes generic details about each compliance requirement other than Special Tests and Provisions) and Part 4 (which includes any program-specific requirements) to perform the audit.

A	B	C	E	F	G	H	I	J	L	M	N
Activities Allowed or Unallowed	Allowable Costs/Cost Principles	Cash Management	Eligibility	Equipment/ Real Property Management	Matching, Level of Effort, Earmarking	Period Of Performance	Procurement Suspension & Debarment	Program Income	Reporting	Subrecipient Monitoring	Special Tests and Provisions
Y	Y	Y	N	Y	Y	Y	Y	N	Y	N	Y

#### A. ACTIVITIES ALLOWED OR UNALLOWED

**Compliance Requirement** – In general, grants can be made for the following purposes (1) airport master planning and site selection, (2) environmental impact studies, (3) land and building acquisition (including relocation of displaced persons and businesses), (4) development and implementation of airport noise studies and compatibility programs, (5) construction of eligible runways, taxiways, aircraft parking aprons, and roadways, (6) airport lighting systems, and (7) visual and electronic air navigational aids. The FAA Modernization and Reform Act of 2012 reauthorizes the AIP bill. Non-primary entitlement funds are a portion of the funds received by North Carolina Department of Transportation as part of the State Block Grant Program and may be used for terminal buildings and parking, fuel farms, hangars, and reimbursement for approved projects.

**CARES Funding** - The FAA will reimburse sponsors for operational and maintenance expenses directly related to the airport incurred on or after January 20, 2020. Operational expenses are those expenses necessary to operate, maintain, and manage an airport. They include expenses such as payroll, utilities, service contracts, and items generally having a useful life of less than one year, including personal protective equipment and cleaning supplies. The FAA will reimburse sponsors for debt service payments directly related to the airport that are due on or after March 27, 2020, which is the date of enactment of the CARES Act.

**CRRSAA Funding** - FAA will reimburse sponsors for operational expenses directly related to the airport incurred on or after January 20, 2020. Operational expenses are those expenses necessary to operate, maintain, and manage an airport. They include expenses such as payroll, utilities, service contracts, and items generally having a limited useful life, including personal protective equipment and cleaning supplies. FAA will reimburse sponsors for debt service payments directly related to the airport that are due on or after December 27, 2020, which is the date of enactment of CRRSAA.

**ARPA Funding** - FAA will reimburse sponsors for operational expenses directly related to the airport incurred on or after January 20, 2020. Operational expenses are those expenses necessary to operate, maintain, and manage an airport. They include expenses such as payroll, utilities, service contracts, and items generally having a limited useful life, including personal protective equipment and cleaning supplies. FAA will reimburse sponsors for debt service payments directly related to the airport that are due on or after March 11, 2021, which is the date of enactment of ARPA. Charitable contributions and sponsorships are not an allowable expense. All reimbursements made under Airport Rescue Grants must comply with 2 CFR part 200, "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards." Section 200.434, "Contributions and Donations" states that contributions and donations, including cash, property, and services, are unallowable. Economic development does not fall into the categories of eligible costs.

**Detailed program guidance is provided in [FAA Order 5100.38D](#), Airport Improvement Program Handbook.**

Note: A list of non-allowable items under the grant program can be found at in FAA Order 5100.38D, Chapter 3.

**Audit Objective** – Determine if the activities involved conform to the provisions of the Grant Agreement.

**Suggested Audit Procedure** - Review project records to determine that activities involved conform to the description contained in the Grant Agreement.

## B. ALLOWABLE COSTS/COST PRINCIPLES

**NOTE:** State Block Grant Program is a Federal program under [49 USC 47128](#) and is subject to Federal cost principles under [2 CFR Part 200](#) **Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards: Final Rule.**

**Compliance Requirement** - In general no costs expended prior to the issuance of a Grant Agreement by the Department of Transportation are eligible for reimbursement unless (1) they involve planning and project formulation costs necessary to develop the project application and its co-requisites of an approved Airport Layout Plan and appropriate environmental finding; (2) the acquisition of eligible land and the engineering and administrative costs associated with such acquisition; or (3) a project which has received prior approval from the Department of Transportation and which has been carried out in accordance with the State Aid to Airports Program Guidance Handbook.

**Audit Objective** - Determine that all costs billed to the grant are allowable.

**Suggested Audit Procedure** - Verify through a sample of invoices that costs are allowable.

**Compliance Requirement** - Local units of government including cities, counties, and airport authorities chartered by the General Assembly are eligible for airport grants. These local units of government should be eligible for sales tax refunds under [GS 105-164.14](#) (b) or (c). If they have not qualified, then these local units of government should take the steps necessary to become eligible. Sales tax paid which may be requested from the NC Department of Revenue as a refund is an ineligible charge.

**Audit Objective** - Determine that the authority is eligible for the refund and that NCDOT did not reimburse any sales taxes eligible for refund.

**Suggested Audit Procedure** - Review financial records, including contractors' sales tax affidavits, and ascertain that no sales taxes were billed to the project.

#### C. CASH MANAGEMENT

**Compliance Requirement** – Grantees of NCDOT are paid on either an advance or reimbursement basis. Grantees that receive advance funding should pay vendors within 3 business days of receipt of the NCDOT payment.

**Audit Objective** - For any reimbursement requests, determine whether supporting documentation was provided that showed costs matched the requested amount submitted to the NCDOT. For advance requests, determine whether the grantee followed procedures to minimize the time elapsing between the receipt of the NCDOT payment and determine if the payment to the vendor was paid within 3 business days of receipt of the NCDOT payment to the sponsor. CARES, CRRSAA, and ARPA funding were on a reimbursement request only with the NCDOT Division of Aviation.

**Suggested Audit Procedure** – Select a sample of reimbursement requests and trace supporting documentation showing that the costs for which reimbursement was requested matches what was paid by the NCDOT.

**Suggested Audit Procedure** - The primary risk lies with advance payments to the airport sponsors. If any were advanced payment requests, then verify that the vendor was paid by the sponsor airport within three business days of receiving payment from the NCDOT.

#### D. RESERVED

#### E. ELIGIBILITY

**N/A at the local level.** Eligibility is determined between FAA and the Division of Aviation.

#### F. EQUIPMENT AND REAL PROPERTY MANAGEMENT

Under this program, FAA is authorized by 49 USC 47107(c), as amended, to allow recipients to reinvest the proceeds from the disposition of real property acquired with Federal awards for noise compatibility or airport development purposes.



NOTE: Equipment purchased with State Block Grant funds is subject to Federal regulations as applicable under OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 CFR Part 200.310-316](#)) and [FAA AC No. 150/5100-10A](#).

### EQUIPMENT

**N/A at the local level.** Eligibility is determined between FAA and the Division of Aviation.

### REAL PROPERTY MANAGEMENT

**1. Compliance Requirement** – Under this program, FAA is authorized by [49 USC Subtitle VII](#), Aviation Programs, as amended, to allow recipients to reinvest the proceeds from the sale of real property acquired with Federal awards for noise compatibility or airport development purposes.

**2. Compliance Requirement** - Grantees must obtain permission of the Department of Transportation and Federal Aviation Administration to dispose of land acquired with State Block Grant Program funds or other federal sources. If approved, the grantee must attempt to obtain fair market value for the property and the proceeds must be expended on the airport in a manner acceptable to the Department of Transportation and Federal Aviation Administration. In addition, any balance of funds from previous land disposals is considered encumbered and must receive similar approval for dispersal. ([AIP Handbook Table 5-39](#)) For CARES, CRRSSA, and ARPA funding, Section 200.434, "Contributions and Donations" states that contributions and donations, including cash, property, and services, are unallowable.

**Audit Objective** - Determine if appropriate permission and fair market value was obtained. Determine the handling of funds from the sale.

#### **Suggested Audit Procedure**

1. Review minutes of the local government and other financial records to determine if land was disposed of during the period or if the local government was holding encumbered funds from past land disposals.
2. Review records to determine if the disposal was approved and what encumbrances, if any, were placed on the proceeds.
3. Review records of the expenditure of any encumbered funds to assure that they were disbursed in accordance with the terms of the encumbrance. Auditor should report amounts received from NCDOT as well as expenditures.

### G. MATCHING, LEVEL OF EFFORT, EARMARKING

All match funding must be provided in compliance with the requirements of [2 CFR Part 200.310-316](#). The grantee's share of project costs on an AIP grant (also known as cost share) is defined in [49 USC 47109](#) and set forth in the grant award.

Acceptable match, whether cash or in-kind, must be allowable and eligible. In addition, match must be provided by the recipient; or provided as cash by a third party; or provided

as in-kind by a third party; or any combination of cash and in-kind provided by the recipient and/or a third party.

**Compliance Requirement** -The share of allowable costs for a grant to be borne by FAA and other parties is established in the Grant Agreement. Matching ratios are specified in each Grant Agreement.

**Audit Objective** - Determine the level of participation.

**Suggested Audit Procedure** - Review the agreement for participation (usually expressed as a percentage) and test sample transactions for adherence to the agreement.

**Compliance Requirement** – In-kind contributions are allowable if specified in the project budget in the Grant Agreement. The requirements for In-kind contributions may be found in [CFR 49, Subtitle A, Part 18.24](#).

**Audit Objective** – Determine that the amount or percentage of contributions or matching funds was provided.

**Suggested Audit Procedure** – Verify that any In-kind match was from an allowable source and that values placed on the In-kind contribution are in accordance with [CFR 49, Subtitle A, Part 18.24](#).

### H. PERIOD OF PERFORMANCE

Each Grant Agreement discloses a period of performance in accordance with the OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ([2 CFR 200.309](#)). Refer to the Uniform Guidance Compliance Supplement ([2 CFR Part 200, Appendix XI](#)) for Suggested Audit Procedures. Awards specify a period during which the grantee may use the funds. The grantee may charge to the award only costs resulting from obligations incurred during the funding period.

**Audit Objective** – Determine that State funds were obligated within the period of performance as specified in the Grant Agreement.

#### **Suggested Audit Procedure**

1. Review the grant agreement to determine any requirements related to the period of performance of the funds.
2. Test a sample of transactions charged to the State award to ensure that the underlying obligation occurred within the period of performance as stated in the award agreement.

### I. PROCUREMENT, SUSPENSION & DEBARMENT

#### Solicitation of Bids

**Compliance Requirement** - [N.C.G.S. 143-129](#) requires the solicitation of bids on construction or repair work requiring expenditure of public money in an amount equal to or more than five hundred thousand dollars (\$500,000) or purchase of apparatus,



supplies, materials, or equipment requiring an estimated expenditure of public money in an amount equal to or more than ninety thousand dollars (\$90,000). [N.C.G.S. 143-131](#) states that all contracts for construction or repair work or for the purchase of apparatus, supplies, materials, or equipment, involving the expenditure of public money in the amount of thirty thousand dollars (\$30,000) or more, but less than the limits prescribed in [G.S. 143-129](#), shall be made after informal bids have been secured. Bid tabulation and governing agency resolution recommending award is required for contract award to the lowest responsible bidder. ([Page 5 Section 3 of the Memorandum #2018-06, NC Department of State Treasurer, March 2018](#))

**Audit Objective** – Determine if bids (formal or informal) were required, and if required were received.

**Suggested Audit Procedure** – Verify that bids were properly solicited and that the contract was awarded to the lowest qualified bidder.

J. PROGRAM INCOME

**N/A** - Grants from NCDOT to counties, municipalities, and airport authorities are not funds that generate income during the grant period. Therefore, this requirement is not applicable at the local level.

K. RESERVED

L. REPORTING

**Compliance Requirement** - “Quarterly Status Report” - Submitted quarterly beginning after notification of grant approval (Notice to Proceed) until project has been completed. Completion of the QSR submittals is verified by the Division of Aviation; therefore, no audit procedures are needed at the local level ([FAA Form 5370-1](#)).

M. SUBRECIPIENT MONITORING

**N/A** - No grants are awarded to subrecipients from the local level. Therefore, no audit procedures are needed at the local level.

N. SPECIAL TESTS AND PROVISIONS

**Compliance Requirement** – [Title 49 USC, Subtitle VII Aviation Programs, Part C, Chapter 481](#) requires that all revenues generated by a public airport be expended for the capital or operating costs of the airport, the local airport system, or other local facilities which are owned or operated by the owner or operator of the airport system and are directly and substantially related to the actual air transportation of passengers or property. This section also provides that the limitation on the use of revenue generated by the airport shall not apply if the governing statutes controlling the owner’s or operator’s financing that was in effect before September 3, 1982, provided for the use of any revenue from the airport to support not only the airport but also the airport owner’s or operator’s general debt obligations or other facilities. Program guidance is provided in [FAA Order 5190.6A, Airport Compliance Requirements, Chapter 4, Section 5](#). The policy can be obtained from [FAA’s Airports Federal Register Notices page](#).

**Audit Objective** - Determine whether the airport owner or operator accounted for all revenue and expenditures in compliance with the provisions of 49 USC Subtitle VII as noted above.

**Suggested Audit Procedures**

1. Review the policy for using airport revenue.
2. Test revenue use transactions (e.g., analysis of airport fund transfers, loans from the fund, interest payments to and from the fund, and expenditures) to verify that airport revenue is used for the capital or operating cost of the airport, or for the excepted costs specified in 49 USC Subtitle VII Aviation Programs.
3. Perform tests of airport revenue generating activities (e.g., leases, telephone contracts, etc.) to ascertain that all revenue generated by the airport is accounted for.
4. Perform tests of transactions to ascertain that payments from airport revenues to the sponsors, related parties, or other governmental entities are airport-related, properly documented, and are commensurate to the services or products received by the airport. It is normal and permissible for municipal airport sponsors to use the services of its other municipal departments to obtain support services for the airport. However, the auditor should inquire as to whether the sponsor, other governmental entities, or related parties may receive airport-generated revenue without providing commensurate services or products to the airport.

**Compliance Requirement – (2021 Compliance Supplement Wage Rate Requirements Cross Cutting Section)** All laborers and mechanics employed by contractors or subcontractors to work on construction contracts in excess of \$2,000 financed by federal assistance funds must be paid wages not less than those established for the locality of the project (prevailing wage rates) by the Department of Labor (DOL) (40 USC 3141-3144, 3146, and 3147).

Non-federal entities shall include in their construction contracts subject to the Wage Rate Requirements (which still may be referenced as the Davis-Bacon Act) a provision that the contractor or subcontractor comply with those requirements and the DOL regulations (29 CFR part 5, Labor Standards Provisions Applicable to Contracts Governing Federally Financed and Assisted Construction). This includes a requirement for the contractor or subcontractor to submit to the non-federal entity weekly, for each week in which any contract work is performed, a copy of the payroll and a statement of compliance (certified payrolls) (29 CFR sections 5.5 and 5.6; the A-102 Common Rule (section 36(i)(5)); OMB Circular A-110 (2 CFR part 215, Appendix A, Contract Provisions); 2CFR part 176, subpart C; and 2 CFR section 200.326).

This reporting is often done using Optional Form WH-347, which includes the required statement of compliance (OMB No. 1235-0008). The U.S. Department of Labor, Employment Standards Administration, maintains a Davis-Bacon and Related Acts web page (<https://www.dol.gov/agencies/whd/government-contracts/construction>). Optional Form WH-347 and instructions are available on this web page.

**Audit Objective** - Determine whether the non-federal entity notified contractors and subcontractors of the requirements to comply with the Wage Rate Requirements and obtained copies of certified payrolls.

**Suggested Audit Procedures** - Select a sample of construction contracts and subcontracts greater than \$2,000 that are covered by the Wage Rate Requirements and perform the following procedures:

- a. Verify that the required prevailing wage rate clauses were included in the contract or subcontract.
- b. For each week in which work was performed under the contract or subcontract, verify that the contractor or subcontractor submitted the required certified payrolls. (Note: Auditors are not expected to determine whether prevailing wage rates were paid).