



**INCLUSIVE**  
PROSPERITY CAPITAL™

# IPC's Solar for All Deep Dive on Davis-Bacon and Related Acts (DBRA) Webinar

**Community Power Coalition**  
**Powering America Together Program**

June 11, 2025

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To the extent allowable by law, IPC will maintain the confidentiality of your submissions. Submission of an eligible project is no guarantee of ultimate selection for financial assistance under this program.

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# SFA Compliance with Davis-Bacon & Related Acts (DBRA)

*The Inflation Reduction Act allows states to access funds to finance and deploy renewable energy. Under the IRA, state programs utilizing federal funds must comply with federal regulations including the Davis-Bacon Act.*

June 11, 2025

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"CohnReznick" is the brand name under which CohnReznick LLP and CohnReznick Advisory LLC and their respective subsidiaries provide professional services. CohnReznick LLP and CohnReznick Advisory LLC (and their respective subsidiaries) practice in an alternative practice structure in accordance with the AICPA Code of Professional Conduct and applicable law, regulations and professional standards. CohnReznick LLP is a licensed CPA firm that provides attest services to its clients. CohnReznick Advisory LLC provides tax and business consulting services to its clients. CohnReznick Advisory LLC and its subsidiaries are not licensed CPA firms.





# The Fundamentals

- What is the Davis-Bacon Act and a Davis-Bacon Related Act?
- Construction Types
- DBA Wages & Workers
- Wage Determinations

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# The Fundamentals – DBA and DBRA

What is the Davis-Bacon Act and a Davis-Bacon Related Act? :

## Davis-Bacon Act (DBA)

- Enacted in 1931 through P.L. 107-217
- Applies to a public building or public work in which Federal Government or the D.C is a party.
- Requires the payment of locally prevailing wages and fringe benefits:
  - To various classes of laborers and mechanics performing similar types of work at the site of work
  - On a weekly basis for federal contracts for construction, alteration, or repair
  - For a public building or public work excess of \$2,000

## Davis-Bacon Related Acts (DBRA)

- More than 70 “Related Acts,” under which federal agencies assist construction projects through grants, loans, loan guarantees, and insurance.
- Examples:
  - Contract Work Hours and Safety Standards Act (CWHSSA)
  - Copeland “Anti-Kickback” Act

## Who Enforces DBA and DBRA?

- Department of Labor (DOL) and Federal Contracting Entity (EPA)



# The Fundamentals – Key Definitions

## DBA Wages & Workers

### What is a wage?

- Wages include the basic hourly rate of pay and benefits.
- BASIC HOURLY WAGE + HOURLY FRINGE RATE = Payment to Laborers and Mechanics

### What is a prevailing wage?

- A prevailing wage is the wage that DOL has determined is paid to more than 50% of workers in a classification on similar projects in the area for the period in question.
- Prevailing wages are determined for a specific work by a “wage determination” made by DOL, in other words, a list of rates it has set. Wage determinations may be classified as ‘general’ or ‘project-based’.

### Who must be paid a prevailing wage?

- “Laborers and mechanics” refers to workers whose jobs are manual or physical in nature (including tradespeople, apprentices, and helpers) as opposed to mental or managerial.



# The Fundamentals – Construction Types

The Construction, Alteration, or Repair of:

## Residential

- Single-family houses, townhouses, and apartment buildings of no more than four (4) stories
  - Includes incidental work, such as site work, parking areas, utilities, streets, and sidewalks.

## Building

- Sheltered enclosures with walk-in access for the purpose of housing persons (5+ stories), machinery, equipment, or supplies and the associated installation of utilities and equipment
  - Includes incidental work such as grading and paving.

## Highway – Not Expected to be Applicable to SFA

- Transportation type projects
  - Roads, streets, airplane runways, and highways

## Heavy - Not Expected to be Applicable to SFA

- Projects involving items that don't fit into any of the preceding categories
  - Infrastructure type projects (water/sewer lines, dams, major bridges, flood control projects )





# The Fundamentals – Key Definitions

## DBA Wages and Fringe

### Wage Decisions

- Applicable to specific geographic areas, generally counties, metro areas, or groups of counties.
  - Wage decisions can be found at: [SAM.gov](https://sam.gov)

### Fringe

- Includes:
  - Health Insurance Premiums, retirement contributions, life insurance, vacation and other paid leave; and
  - Contributions to bona fide training funds.
- Does not include:
  - Employer payments or contributions required by other Federal, State, or local laws (i.e. SSI/SSDI)

### Payment Standard

- Contractors must ensure that each worker receives no less than:
  - $\text{BASIC HOURLY WAGE} + \text{HOURLY FRINGE RATE} = \text{Payment to Workers and Mechanics}$



# The Fundamentals – Key Definitions

## DBA Wages and Fringe

sam.gov


An official website of the United States government [Here's how you know](#)


**Subaward Reporting is live on SAM.gov** [Show Details](#)  
Mar 8, 2025

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Apr 22, 2025

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 **SAM.GOV®**



**The Official U.S. Government System for:**

- Contracting**  
Contract Opportunities, Contract Award Reports ONLY from fpds.gov and Subcontract Reports (was FCRS.gov)
- Wage Determinations**
- Federal Hierarchy**  
Departments and Subtiers
- Federal Assistance**  
Assistance Listings and Subaward Reports (was FSRS.gov)
- Entity Information**  
Entities, Disaster Response Registry, Exclusions, and Responsibility/Qualification (was fapiis.gov)
- Entity Reporting**  
SCR and Bio-Preferred Reporting

Are you searching for Federal Acquisition Supply Chain Security Act (FASCSA) orders? [View FASCSA Orders](#)

**Register Your Entity or Get a Unique Entity ID**

Register your entity or get a Unique Entity ID to get started doing business with the federal government.

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[Check Entity Status](#)

# The Fundamentals – Key Definitions

## DBA Wages and Fringe

### Wage Determinations

A wage determination (WD) is a set of wages, fringe benefits, and work rules that the U.S. Department of Labor has ruled to be prevailing for a given labor category in a given locality.

#### Help me find a wage determination

##### I know the WD number

🔍 Search by WD Number

e.g. DBA or SCA Identifier



☒ Show active only

##### I do not know the number

🔍 Start your search by selecting a category

**Public Buildings  
or Works**



Wages rates for laborers and  
mechanics

**Davis-Bacon Act (DBA)**

**Service  
Contracts**



Wage rates for service  
employees

**Service Contract Act (SCA)**

# The Fundamentals – Key Definitions

## Wage Determination



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Search

2

Filter By

Location

State

Georgia

County/ Independent City

Fulton

DBA Construction Type

Select...

Status

☒ Active

☐ Inactive

Published Date

Anytime

Reset

Wage Determinations ^

By Wage Determination ID

Construction (DBA)

Service Contracts (SCA)

Coll

Sort by

Published Date

Showing 1 - 4 of 4 results

Davis-Bacon Act WD #: [GA20250307](#)

State  
Georgia

Counties  
Fulton

DBA Wage Determination

Modification Number  
2

Construction Types  
Building

Published Date  
Apr 11, 2025

Davis-Bacon Act WD #: [GA20250001](#)

State  
Georgia

Counties  
Fulton

DBA Wage Determination

Modification Number  
0

Construction Types  
Highway

Published Date  
Jan 3, 2025

Davis-Bacon Act WD #: [GA20250291](#)

State  
Georgia

Counties  
Barrow, Bartow, Butts, Carroll, Cherokee, Clayton, Coweta,  
Dawson, Dekalb, Douglas, Fayette, Fulton, Gwinnett,  
Haralson, Heard, Henry, Jasper, Lamar, Meriwether, Morgan,  
Newton, Paulding, Pickens, Pike, Rockdale, Spalding,

DBA Wage Determination

Modification Number  
0

Construction Types



# The Fundamentals – Key Definitions

## Wage Determination

Modification Number	Publication Date
0	01/03/2025
1	02/07/2025
2	04/11/2025

ASBE0048-003 04/01/2024

	Rates	Fringes	
ASBESTOS WORKER/HEAT & FROST INSULATOR.....	\$ 32.25	18.51	\$50.40/hr

CARP1263-001 10/01/2023

	Rates	Fringes
MILLWRIGHT.....	\$ 31.58	17.05

\* ELEC0613-004 03/03/2025

# The Fundamentals – Key Definitions

## Wage Determination

LABORER: Asphalt, Includes Raker, Shoveler, Spreader and Distributor.....	\$ 15.69 **	0.00
LABORER: Common or General.....	\$ 14.57 **	0.00
LABORER: Pipelayer.....	\$ 12.55 **	1.90
OPERATOR: Bobcat/Skid Steer/Skid Loader.....	\$ 20.24	0.00
OPERATOR: Bulldozer.....	\$ 15.23 **	0.00
OPERATOR: Grader/Blade.....	\$ 16.80 **	0.00
OPERATOR: Loader.....	\$ 21.32	0.00
OPERATOR: Roller.....	\$ 16.82 **	1.19

PIPEFITTER (Excluding HVAC Pipe and Unit Installation).....	\$ 39.13	13.31
(HVAC Pipe Installation Only).....	\$ 31.68	13.31
(HVAC Unit Installation Only).....	\$ 39.13	13.31
PLUMBER.....	\$ 39.13	13.31

SHEE0085-022 07/01/2024

	Rates	Fringes
SHEET METAL WORKER (Excludes HVAC Duct Installation).....	\$ 34.58	16.49
SHEET METAL WORKER (HVAC Duct Installation Only).....	\$ 35.21	17.72

\* UAVG-GA-0001 01/01/2025

	Rates	Fringes
IRONWORKER, REINFORCING.....	\$ 31.31	17.68

\* SUGA2017-022 04/15/2021

	Rates	Fringes
CARPENTER (Form Work Only).....	\$ 18.02	0.00
CARPENTER, Excludes Form Work....	\$ 17.48 **	0.00
CEMENT MASON/CONCRETE FINISHER...	\$ 10.00 **	0.00
GLAZIER.....	\$ 22.31	7.69
INSTALLER - GUARDRAIL.....	\$ 20.00	0.00

# The Fundamentals – Key Definitions

## Worker Classifications

### Wage Decisions

- Include various construction worker classifications (laborer, electrician, plumber, roofer, plasterer, painter, etc.)

### Fringe

- Includes:
  - Health Insurance Premiums, retirement contributions, life insurance, vacation and other paid leave; and
  - Contributions to bona fide training funds.
- Does not include:
  - Employer payments or contributions required by other Federal, State, or local laws (i.e. SSI/SSDI)

### Best Practices and Items of Note:

- Wage “Lock-in Dates” (10 Day Rule and 90 Day Rule)
- Proper worker classification (Laborers)
- Properly post DBRA posters and wage determinations at job site
- Bona Fide Training Programs (Registered with US DOL-OA, State Apprenticeship Agency - SSA, Certified by OA or SSA)





# Roles and Responsibilities

- Contractors

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# Roles and Responsibilities

## Contractors

### 1. Bid Solicitation

- Bid Inconsistencies
- Identify Need for Wage Conformance

### 2. Subcontracting

- Debarment check for subcontractors (SAM.gov)
- Incorporate DBRA Terms & Conditions into all subcontracts

### 3. Ongoing Activities

- Payment of Covered Laborers and Mechanics
  - Hourly Wage + Fringe listed in the “locked-in” Wage Decision
- Submit weekly certified payroll

### 4. Compliance

- Store payroll submissions (3-year period after completion)
- Post Required Signage at Worksite



# Roles and Responsibilities

## Contractors

### Wage Decision

- A Davis-Bacon wage decision is a listing of different work classifications and minimum wage rates that must be paid to anyone performing work in those classifications.
- You'll want to ensure that the work classifications you need are contained in the wage decision, and make sure you know exactly what wage rate you'll need to pay.
- Some wage decisions cover several counties and many types of construction work, making them lengthy to read.
  - A contract administrator may prepare a Project Wage Sheet which shows only the classifications and wage rates for a particular project.
- The prime contractor is responsible for posting a copy of the wage decision or Project Wage Sheet at the job site in an easily accessible place.



# Roles and Responsibilities

## Contractors

### Davis Bacon Poster


- The prime contractor is responsible for posting a copy of the DOL poster “Employee Rights under the Davis-Bacon Act” (Form WH-1321) at the job site in a place that is easily accessible and where it will be protected from the elements.
- This posting is intended to provide information to the laborers about their entitlement to a prevailing wage for their trade, and to advise them whom to contact if they have questions or want to file a complaint.

**WORKER RIGHTS**  
**UNDER THE DAVIS-BACON ACT**


**FOR LABORERS AND MECHANICS  
WORKING ON FEDERAL OR  
FEDERALLY ASSISTED  
CONSTRUCTION PROJECTS**

**The law requires employers to display this poster where workers can readily see it.**

<b>PREVAILING WAGES</b>	You must be paid not less than the wage rate listed in the Davis-Bacon Wage Decision posted with this notice for the work you perform.
<b>OVERTIME</b>	You must be paid not less than one and one-half times your basic rate of pay for all hours worked over 40 in a work week. There are few exceptions.
<b>ENFORCEMENT</b>	Contract payments can be withheld to ensure workers receive wages and overtime pay due, and liquidated damages may apply if overtime pay requirements are not met. Davis-Bacon contract clauses allow contract termination and debarment of contractors from future federal contracts for three years. A contractor who falsifies certified payroll records or induces wage kickbacks may be subject to civil or criminal prosecution, fines and/or imprisonment.
<b>APPRENTICES</b>	Apprentice rates apply only to apprentices properly registered under approved federal or state apprenticeship programs.
<b>RETALIATION</b>	The law prohibits discharging or otherwise retaliating against workers for filing a complaint, cooperating in an investigation, or testifying in a proceeding under the Davis-Bacon and Related Acts.
<b>PROPER PAY</b>	If you do not receive proper pay, or require further information on the applicable wages, contact the Contracting Officer listed below: <div></div> or contact the U.S. Department of Labor's Wage and Hour Division.

 **WHD** WAGE AND HOUR DIVISION  
UNITED STATES DEPARTMENT OF LABOR

866-487-9243  
dol.gov/agencies/whd



WH-1321 MAY 2016

# Roles and Responsibilities Contractors

## Perform and Review Certified Payrolls

- Each employer must prepare, certify, and submit weekly payroll reports to the sponsor, applicant, or owner for any contract work performed. This begins the first week work is performed at the work site.
- The employer must ensure all information from DOL Payroll Form WH-347 is included and legible.
- Each weekly payroll submission must be accompanied by a “Statement of Compliance” that bears the original ink signature of the owner or their designee.
- Employers are not required to submit reports for weeks when no work was performed.

**U.S. Department of Labor** **Davis-Bacon and Related Acts Weekly Certified Payroll Form**  
Wage and Hour Division  
(For Contractor's Optional Use; See Instructions at [www.dol.gov/whd/forms/wh347instr.htm](http://www.dol.gov/whd/forms/wh347instr.htm))  
Unless otherwise noted, the information requested is specific to the named project below.  
Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number.

☐ SUBMISSION OF FINAL DBRA CERTIFIED PAYROLL FORM ☐ PRIME CONTRACTOR ☐ SUBCONTRACTOR

Rev. January 2025  
OMB No.: 1235-0008  
Expires: 01/31/2028

PROJECT NAME		PROJECT NO. or CONTRACT NO.		CERTIFIED PAYROLL NO.		PRIME CONTRACTOR'S/SUBCONTRACTOR'S BUSINESS NAME										
PROJECT LOCATION		WAGE DETERMINATION NO.		WEEK ENDING DATE		PRIME CONTRACTOR'S/SUBCONTRACTOR'S BUSINESS ADDRESS										
(1A)	(1B)	(1C)	(1D)	(1E)	(2)	(3)	(4)	(5)	(6A)	(6B)	(6C)	(7A)	(7B)	(8)	(9)	
WORKER ENTRY NO.	WORKER LAST NAME	WORKER FIRST NAME	WORKER MIDDLE INITIAL	WORKER IDENTIFYING NO.	(U) JOURNEYWORKER (RA) REGISTERED APPRENTICE	LABOR CLASSIFICATION	ST = STRAIGHT TIME OT = OVERTIME	(TOP) DAYS OF WORK WEEK (BOTTOM) DATES	TOTAL HOURS WORKED FOR WEEK	HOURLY WAGE RATE PAID FOR ST AND OT	TOTAL FRINGE BENEFIT CREDIT	PAYMENT IN LIEU OF FRINGE BENEFITS	GROSS AMT EARNED	GROSS AMT EARNED FOR ALL WORK	DEDUCTIONS FOR ALL WORK	NET PAY TO WORKER FOR ALL WORK
							HOURS WORKED EACH DAY									
							ST									
							OT									
							OT									
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# Roles and Responsibilities

## Contractors

### Reporting Certified Payrolls

- Each payroll report must contain:
  - a) Project and contractor/ subcontractor information
    - Identify the name, address, project name and number, and week ending date
  - b) Employee Information
    - Provide employee name and an individually identifying 4-digit number per laborer
  - c) Work Classification
    - Classification in accordance with the wage decision based on the type of work performed
  - d) Apprentices or trainees
    - Copy of each apprentice or trainee's registration in a registered or approved program
  - e) Split classifications
    - Separate entries for each classification of work performed, distributing the hours to each class accordingly and reflecting the rate of pay/ gross earnings for each class.
  - f) Hours worked
    - Payroll must show regular and OT hours, and provide daily and weekly totals
  - g) Rate of Pay



# Roles and Responsibilities

## Contractors

### Submitting and Retaining Certified Payrolls

- The prime contractor should review each subcontractor's payroll reports for compliance prior to submitting the reports to the contract administrator. All payroll reports must be submitted through the prime contractor.
- The prime contractor is responsible for the full compliance of all subcontractors and will be held accountable for any wage restitutions.
- Thoroughly reviewing subcontractor payroll submissions allows for early detection of misunderstandings, costly underpayments, and could prevent potential financial losses.
- Every contractor must keep a complete set of their own payrolls and other basic records for at least 3 years after completion of the project. The prime must maintain these records for all contractors, including subcontractors, for at least 3 years after project completion.



# Roles and Responsibilities

## Contractors

### Additional Work Classification and Wage Rates Parameters

- Applicable wage decisions must be forwarded to the Department of Labor when:
  - a) The requested work classification is used in the project by the construction industry;
  - b) The work that will be performed by the requested work classification is not performed by one that is already contained within the applicable wage decision;
  - c) The proposed wage rate for the requested work classification bears a reasonable relationship to the wage rates on the wage decision; and
  - d) The workers that will be employed in the requested work classification or the workers' representatives agree with the proposed wage rate.
- The wage rate and fringe benefits should bear a reasonable relationship to the entirety of the rates within the relevant category: skilled crafts, laborers, truck drivers, and power equipment operators.

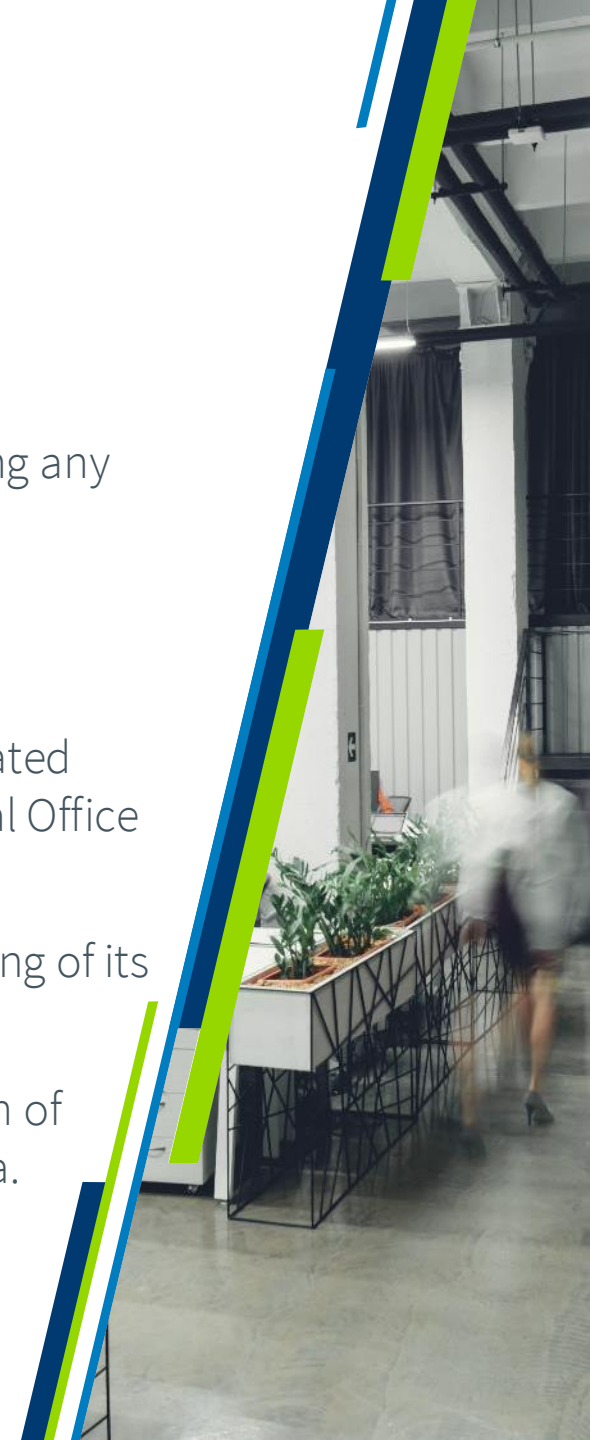


# Roles and Responsibilities

## Contractors

### **Making Additional Work Classification and Wage Rates Requests**

- The proposal must originate with the prime contractor/employer and include the contract/project involved, the requested work classification, and the wage rate, including any bona fide fringe benefits provided.
- The prime contractor/employer should use form SF-1444, Request for Authorization of Additional Classification and Rate, to submit the request.
- If the LSS/LCA finds that the request meet approval criteria, the completed SF-1444, related documentation, and the applicable wage decision will be submitted to the DOL National Office for final decision.
- DOL must respond within 30 days of the submission. DOL will notify the LSS/LCA in writing of its decision.
- The prime contractor/employee or other interested party may request a reconsideration of rejected requests in writing, accompanied by a full statement and supporting wage data.





# Roles and Responsibilities

## Contractors

### Common Errors

- Inadequate Payroll Information
  - Information must include contractor/subcontractor name and address, project name and number, and week ending date.
- Missing Identification Numbers
  - Payroll records must contain the name and an individually identifying 4-digit number for each laborer and mechanic as well as their address and full SSN during construction and for 3 years following completion.
- Incomplete Payrolls
  - Must include all required employee, wage, and deduction information, a completed statement of compliance, and an original signature by a principal or authorized agent of the firm.
- Classifications
  - Each employee must be classified in accordance with the wage decision based on the type of work they perform. For split classifications, separate entries must be made.
- Wage Rates
  - Payroll must show the basic hourly rate of pay for each employee for each project as well as the OT rate if any OT was worked. For any piece-work employees, an effective hourly rate must be computed each week based on their piece-work earnings for that week.



# Roles and Responsibilities

## Contractors

### Common Errors Cont'd

- Apprentices and Trainees
  - First payroll for apprentices/trainees must be accompanied by a copy of their registration in an approved program as well as a copy of the portions of the wage rates and ratio.
- Overtime
  - If an employee performs work at job sites other than the project for which payroll is prepared, those “other job” hours should not be reported on the payroll.
- Computation and Deductions
  - All deduction types should be identified on the payroll. Voluntary deductions must be authorized in writing by the employee or provided for in a collective bargaining agreement. The first payroll on which voluntary deductions appear should be accompanied by a signed note from the employee that show the type, amount, and frequency of the deduction.
- Falsification
  - Falsification of payroll information and certifications may subject the employer to civil or criminal prosecution.



# Roles and Responsibilities

## Contractors

### Corrections, Restitution, and Sanctions

- Administrative Review on Labor Standards Disputes
  - a) Additional classification and wage rate requests are sometimes denied by DOL. An employer dissatisfied with the denial can request reconsideration by the DOL. Any interested party may request reconsideration so long as the request is made in writing and thoroughly addresses the denial reason(s).
  - b) In cases of underpayment findings, the primary goal is to reach agreements about how much wage restitution may be due and to promptly deliver restitution to underpaid workers. The contract administrator usually works informally with employers to reach such agreements.
  - c) Disputes concerning prevailing wage rates, DBRA applicability, character of work decisions, and interpretation and application of DOL regulations, must be referred to the DOL Wage and Hour Administrator for their ruling and/or interpretation.
- Withholding
  - a) The contract administrator will withhold payments to ensure the payment of wages that are believed to be due and unpaid (e.g., if wage underpayments or other violations are not corrected within 30 days of notification to the prime contractor).



# Roles and Responsibilities

## Contractors

### Corrections, Restitution, and Sanctions Cont'd

- Deposits and Escrows
  - a) In some cases, certain labor standard issues may not be resolved in time to meet project closeout deadlines. To permit closing to proceed while outstanding labor issues are resolved, a deposit or escrow account may be established as a guarantee to ensure the restitution of any underpaid wages.
  - b) Deposit or escrow accounts may also hold fringe benefit payments that are due and/or liquidated damages that are assessed for violations of CWHSSA OT provisions.
  - c) When a final decision is rendered the contract administrator makes disbursements from these accounts in accordance with the decision.
- Contractors or subcontractors that violate the labor standards may face administrative sanctions such as:
  - a) DOL debarment- up to 3 years
  - b) Agency Sanctions
  - c) Limited Denials of Participation (LDPs)- prohibit participation in Federal programs for up to 1 year
  - d) Other Debarment or suspension





## Questions?

### References:

- <https://www.epa.gov/grants/dbra-requirements-epa-subrecipients>
- <https://www.dol.gov/agencies/whd/government-contracts/prevaling-wage-resource-book/dbra-coverage>
- [https://www.dol.gov/agencies/whd/government-contracts/prevaling-wage-resource-book/db-compliance-principles#\\_DAVIS-BACON\\_AND\\_RELATED](https://www.dol.gov/agencies/whd/government-contracts/prevaling-wage-resource-book/db-compliance-principles#_DAVIS-BACON_AND_RELATED)
- <https://www.cesa.org/wp-content/uploads/Davis-Bacon-Primer-GGRF-Solar-for-All.pdf>



# Additional Tools, Resources, and Links

- [Community Power Coalition “Powering America Together” Program home page](#)
- [IPC Solar for All Resources Page](#)
- [Program Guidance](#)
- [FAQs](#)
- [EPA DBRA Guidance](#)

# Q & A



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PROSPERITY CAPITAL™

**INCLUSIVEPROSPERITYCAPITAL.ORG**



## Contacts

For program inquiries, please contact:

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