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March 20, 2008

Real Estate & Land Use

NEWSLETTER OF THE REAL ESTATE AND LAND USE PRACTICE OF MANATT, PHELPS & PHILLIPS, LLP

Prevailing Wages Update

Roger A. Grable, 714.371.2550

In response to complaints by both labor and the private sector, the Director of the Department of Industrial Relations has proposed sweeping new regulations governing certified payrolls and state and local labor compliance programs. Prevailing wages as determined under the Labor Code must be paid by private contractors working on public works projects. The scope and pitfalls of these requirements were reported earlier in *Manatt Real Estate and Land Use* newsletters. All affected parties have complained about the cost and inefficiency of the enforcement of this law, particularly the lack of consistency in the application of the law and the fines and penalties imposed on violators.

The regulations proposed by the Director are intended to address these concerns by bringing greater clarity and specificity to existing monitoring and enforcement standards. Among other clarifying provisions, the new regulations would provide for the following changes:

- Express authorization for the electronic maintenance and submission of certified payroll records.
- Establish a specific required frequency for the furnishing of certified payrolls.
- Establish a specific statement of overall policies that govern enforcement of labor compliance programs.
- Specify that adherence to a labor compliance program that does not comply with the regulations will not excuse a failure to pay prevailing wages.
- Require that prejob conferences include a description of the legal duty to provide workers with itemized wage

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- Clarification of confusion over when statutory approvals are required.
- Increasing the Director's deadline for certain approvals from 30 to 60 days.
- Establishing minimum standards for the monitoring of payroll records, investigations of complaints and potential violations and audits.
- Clarification of the role of public works coverage determinations.
- Provide for early notice of proposed violations so as to enable contractors to resolve them before significant penalties are assessed.
- Clarification of the ongoing confusion relating to program responsibilities and to address the potentially excessive and disruptive use of withholding authority.

The text of the proposed regulations is available on the Department's website at http://www.dir.ca.gov/DIRRulemaking.html. After holding the hearings and considering all timely and relevant comments received, the Director may adopt the regulations as proposed or may modify the regulations. If the Director makes modifications, the proposed text will be made available to the public for at least 15 days prior to adoption by the Director.

For the most part, these revised regulations seem to be favored by the private sector. Private contractors on public works projects should track the status of these regulations, as they will become effective immediately upon adoption by the Director.

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FOR ADDITIONAL INFORMATION ON THIS ISSUE, CONTACT:

Roger A. Grable Roger Grable's practice focuses on land use and entitlement law. He specializes in development processing, development agreements, CEQA, subdivision and vested rights issues. He has substantial experience in the area of affordable housing development and in negotiating school mitigation agreements.

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