

CONTRACTOR COMPLIANCE

The Arkansas Department of Transportation is committed to equal employment opportunity. This commitment includes working cooperatively with highway construction contractors to ensure compliance with federal statutes, regulations and executive orders which require equality of opportunity in the highway construction industry.

The Contractor Compliance section of the Department's Affirmative Action Plan outlines programs and procedures developed to monitor contractor compliance. District Engineers must assure that procedures for monitoring contractor compliance at the District level are consistent with those in the manual. Overall responsibility for the direction of the Contractor Compliance Program has been assigned to the Section Head - EEO/DBE.

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I. ORGANIZATION AND STRUCTURE

A. LOCATION

The Equal Employment Opportunity Section is located in the Central Office, 10324 Interstate 30, Little Rock, Arkansas 72209.

B. CONTRACT COMPLIANCE STAFF

1. The contract compliance staff is composed of the Section Head – EEO/DBE, the External EEO Coordinator and an Office Assistant. The Section Head is responsible for managing and administering the contract compliance function. The principal accountabilities of the External EEO Coordinator are as follows:
 - a. Provide advisory and consultative assistance to Central Office and Field Office personnel in the interpretation and implementation of policies and procedures pertaining to the State's External EEO Program.
 - b. Provide assistance and guidance to contractors involved in Federal-aid construction projects to ensure their compliance with the EEO, Training and Disadvantaged Business Enterprise Special Provisions which are an integral part of their construction contracts.
 - c. Conduct briefings regarding contract EEO, Training and Disadvantaged Business Enterprise Special Provisions at preconstruction conferences involving Federal-aid construction contracts.
 - d. Conduct EEO Project Specific and Areawide Reviews to ensure EEO Program objectives are accomplished by the contractor.
 - e. Maintain local labor force data and other pertinent information to be used by the EEO Section to advise and assist contractors toward implementing their Affirmative Action Programs.
 - f. Establish liaison with minority oriented organizations, educational and vocational institutions and agencies performing similar or related duties.
 - g. Exercise administrative control of the State's External EEO Program.
 - h. Prepare reports and summaries to be forwarded to Federal Highway Administration (FHWA) as required.
2. The Office Assistant principal accountabilities to the external function are:
 - a. Prepare necessary correspondence to contractors, FHWA and Department personnel involved in the EEO function.
 - b. Prepare and maintain project folders on Federal-aid construction contracts.
 - c. Prepare correspondence to contractors pertaining to the requirements and submission of necessary reports.
 - d. Maintain necessary logs to record receipt of forms and reports.
 - e. Advise contractors and project personnel on the preparation and submission of forms and reports.

- f. Purchase and maintain a supply of forms and office supplies necessary to accomplish the EEO function.
3. Only the personnel assigned to the EEO Section perform EEO functions full-time. The EEO compliance program is centralized.

C. DIVISION PERSONNEL

1. The Program Management Division (PM) is responsible for including Plans, Specifications & Estimate documents in prime contracts for notification of EEO responsibilities by inclusion of FHWA-1273 and EEO Special Provisions required by Title 23, Code of Federal Regulations, Part 230, Subchapter C, as applicable.
2. Requests to sublet portions of the contract are reviewed, processed and approved by the Assistant Chief Engineer - Operations. Proposed subcontracts on Federal-aid projects are required to contain the following, or similar, statement: "All of the provisions of FHWA-1273 and Supplements, required Contract Provisions, Federal-aid Contracts, attached hereto, are made a part of this subcontract." The certification pertaining to EEO is also attached and must be completed by each subcontractor. Upon receipt and review of the proposal to sublet, if everything is in order, one complete set of the labor requirements is assembled and transmitted to the approved subcontractor with the letter of approval.

D. DISTRICT PERSONNEL

There are no District personnel with direct EEO responsibilities and duties in regard to contractor compliance. The District Engineer (DE), in exercising total responsibility for all maintenance and construction, does possess a general knowledge of the contractor's EEO obligations. The DE has the responsibility of ensuring that preconstruction conferences are scheduled for Federal-aid contracts awarded within the District. The Resident Engineer (RE) serves as moderator during such conferences.

E. PROJECT PERSONNEL

1. The RE and the RE's staff are responsible for labor compliance and engineering. The RE administers the EEO Program as it applies to highway construction activities. The RE's responsibilities consist of the following:
 - a. Conduct preconstruction conferences.
 - b. Appoint an EEO Field Inspector.
 - c. Instruct the Field Inspector in the preparation of reports.

2. The responsibilities of the EEO Field Inspector consist of the following:
 - a. Ensure the Initial EEO On-Site Inspection Reports of Prime Contractors, Subcontractors or DBE Contractors are submitted as required on Federal-aid projects.
 - b. Ensure Quarterly Field Reports are submitted as required on Federal-aid contracts to include prime contractors and subcontractors.
 - c. Review the project site bulletin board to ensure it contains necessary posters and notices for each contractor performing on the project.
 - d. Conduct On-Site Inspections for the following purposes:
 - (1) Determine how often the contractor's/subcontractor's EEO Officer or company representative visits the project.
 - (2) Interview the contractor's supervisory personnel to evaluate their knowledge of the company's EEO obligations.
 - (3) Inquire about procedures used in advertising. Do advertisements contain the notation "AA/EOE Women, Minority and Disabled People Encouraged to Apply"? (This notation is recommended, however, any notation which identifies the company as an Affirmative Action/Equal Opportunity Employer may be sufficient.)
 - (4) Interview contractor's employees to determine methods used by the contractor to inform them of the company's EEO policy; i.e., letters, meetings, printed handouts, etc.
 - (5) Determine if facilities are provided on a nonsegregated basis.
 - (6) Determine if any applicant for employment or employee has registered a discrimination complaint.
 - (7) Inquire of the contractor's representative at the time of the project visit as to the positive efforts the contractor has exerted to place minority, female and disabled employees into on-the-job training.
 - (8) Determine if trainees are being utilized in skill classifications identified on the company payroll.
 - (9) Determine if Disadvantaged Business Enterprise requirements are being accomplished in accordance with the goal that has been established.
 - d. On projects that have the Training Proposal Special Provision (TPSP), the following will be accomplished:
 - (1) Ensure the training proposed by the contractor is under an approved training program.
 - (2) Ensure the receipt of a registration card for each trainee at the time of entry into training.
 - (3) Prepare a training progress record for each trainee employed under the contract special provision.
 - (4) Transcribe hours of training indicated on contractor's weekly payroll to the trainee progress record.

- (5) Prepare a trainee interview form on each trainee enrolled on the project. This form will be prepared in duplicate. The original will be furnished to the EEO Section and a copy will be retained in the RE's file. The purpose of the interview is to determine whether the trainee:
 - (a) Is eligible for the training program.
 - (b) Is being trained in the craft in which enrolled.
 - (c) Has received a copy of the training program or training classification.
- (6) Prepare a contractor interview form on the contractor or an appointed superintendent/foreman (woman) quarterly to evaluate their knowledge of the OJT Program. The distribution of this form is the same as the trainee interview form.
- (7) As trainees terminate the training program, a trainee termination form is prepared by the contractor. One copy is sent to each of the following: RE, EEO Section and the sponsoring agency of the training program. The EEO Field Inspector will review the form to ensure accuracy of the information provided.

F. TRAINING

The EEO Staff has attended numerous seminars and training sessions in order to acquaint themselves with equal opportunity requirements. The EEO Staff will continue to attend seminars and training sessions where the information disseminated is pertinent to the EEO function.

The External EEO Coordinator will conduct training sessions with District and project personnel to discuss the components of the External Program and the monitoring requirements on Federal-aid projects. These training sessions will be conducted when there are revisions to the program and as need dictates. Internal and external resources will be used to assist in preparing and presenting these training sessions.

II. CONTRACT COMPLIANCE PROCEDURES

A. IMPLEMENTATION

1. As noted in the previous section, the RE's EEO Field Inspector performs On-Site Inspections. The Field Inspector documents the inspection by completing an EEO Quarterly Field Report. The original is sent to the EEO Section and a copy is retained by the RE.

The External EEO Coordinator utilizes a "formal" approach to monitoring contractor compliance with the EEO obligations as outlined in the Special Provisions. The "formal" types of reviews are the Project Specific and the Areawide. The major difference between these procedures is the Project Specific focuses on one project and can include subcontractors, whereas the Areawide includes two or more projects in one geographical area and does not include subcontractors.

2. The Project Specific and Areawide Reviews involve obtaining certain information from the contractor. The information requested is submitted by the contractor to the External EEO Coordinator. The information is analyzed through a Desk Audit and the results of the preliminary analysis are used to determine what specific information requires clarification during the on-site verification.

Priority in scheduling Project Specific and Areawide Reviews is given to those contractors:

- a. Working on a significant number of contracts.
 - b. Which hold the greatest potential for employment and promotion of minorities and females.
 - c. Working in areas which have significant minority and female labor forces within a reasonable recruitment area.
 - d. Working on projects that include special training provisions.
 - e. Working on projects that have a Disadvantaged Business Enterprise goal.
 - f. Whose compliance with equal opportunity requirements is questionable (based on review reports or other available information).
 - g. Who have not been reviewed or audited during the previous year.
3. When a contractor has been selected for a Review, a notification letter is sent to the contractor. The contractor is allowed at least three (3) weeks from the receipt of the notification letter to submit the requested information.

4. Reviews are conducted in two phases. Phase One will consist of a preliminary analysis (Desk Audit) of the information received from the contractor. The External EEO Coordinator will:
 - a. Review the information received from the contractor for completeness.
 - b. Review employment data for mathematical accuracy.
 - c. Review employment data for overall minority/female representation to ensure compliance with the employment goals outlined in 41 CFR 60-4, Appendixes A and B-80.
 - d. Conduct a workforce analysis to identify specific classifications where minorities and females are underutilized.
 - e. Review previous compliance review reports on the contractor to identify serious deficiencies.
 - f. Review the remainder of the information received and identify any problem areas in order to apprise the contractor.
 - g. Review files for delinquent EEO reports.

5. Phase Two will consist of an on-site verification. The External EEO Coordinator will:
 - a. Obtain clarification of any discrepancies in the material submitted and solicit any additional information needed from the contractor.
 - b. Review the job site bulletin board to ensure that required posters and notices are conspicuously displayed.
 - c. Conduct physical tour of the job site to ensure facilities are nonsegregated.
 - d. Interview the project superintendent to determine his/her knowledge of the company's EEO program.
 - e. Interview contractor's employees to determine if an EEO meeting has been held on the project and if they could identify the company's EEO officer.

6. Upon completion of the on-site verification, the External EEO Coordinator will conduct an "Exit Conference" session with the contractor. At this time the External EEO Coordinator will:
 - a. Discuss issues and concerns with the contractor.
 - b. Negotiate a Voluntary Corrective Action Plan (VCAP) with the contractor if minor deficiencies have been found during the review and provide specific recommended actions to correct each deficiency. The contractor must submit the VCAP within 15 days of the "Exit Conference."
 - c. Advise the contractor that a formal compliance determination will be provided within 15 days from the "Exit Conference" and the acceptance of a VCAP during the "Exit Conference" does not preclude a determination of noncompliance if deficiencies not addressed by the plan are uncovered during the final analysis and report writing.

7. The External EEO Coordinator will make a final compliance determination after thorough review of all information obtained during the review.

A contractor is in compliance when there is sufficient information to determine that the EEO requirements of the contract have been effectively implemented.

A contractor is in noncompliance when there is sufficient information to determine that the contractor failed to effectively implement the EEO requirements.

If a contractor is found in noncompliance, efforts to bring the contractor into compliance shall be initiated through the issuance of a Show Cause Notice (SCN) that outlines each deficiency along with specific recommended actions to correct each deficiency. The contractor has 30 days from receipt of a SCN to develop and submit an acceptable Corrective Action Plan (CAP).

Follow-up reviews will be conducted on those contractors where the initial review resulted in a finding of noncompliance and a SCN was issued.

8. The Compliance Data Report will be used to summarize Project Specific and Areawide Reviews. A copy of the review will be forwarded to the Federal Highway Administration Division Office within 15 days after completion of the review.
9. Home Office Reviews will not be conducted on contractors who have less than 15 employees in their home office workforces.

B. DISTRICT AND PROJECT PERSONNEL INDOCTRINATION

As needed, the External EEO Coordinator will conduct meetings with District and Project Personnel for the purpose of discussing FHWA contract compliance directives and the Department's plan of action for compliance.

C. CONTRACTOR INDOCTRINATION

1. The RE schedules a preconstruction conference for each Federal-aid project and furnishes a copy of the letter of notification to the EEO Section. The External EEO Coordinator participates in these conferences provided the contractor has not received an EEO briefing previously. The procedures for advising contractors of their EEO contract requirements are as follows:
 - a. The External EEO Coordinator gives a summary of the EEO provisions of the contract and furnishes contractors in attendance a pamphlet in which the following information is included:

- (1) The name, address and telephone number of the External EEO Coordinator who conducts the EEO briefing.
- (2) A notice informing contractors that subcontractors who have subcontracts in excess of \$10,000 are subject to the same obligations as the prime contractor. The contractor is reminded to exercise maximum efforts to utilize disadvantaged businesses.
- (3) A sample Purchase Order Agreement (POA) in which the appropriate EEO clauses have been incorporated. The contractor is informed that a POA must be accomplished for all material purchases and leases of equipment in the amount of \$10,000 or more. The EEO Clauses can not be made by reference only.
- (4) A Documentation Schedule to be used by the contractor as a guide for documenting affirmative action steps taken to comply with the EEO Special Provisions.
- (5) Lists of referral sources likely to yield minority and female applicants in the contractor's recruitment area. The lists include Department of Workforce Services Offices, Vocational-Technical Schools, Offices of Economic Opportunity, Technical Colleges and Technical Institutes, Minority Male and Minority Female Referral Sources, Female Referral Sources (Minority and Non-Minority), Disabled Referral Sources and Minority Oriented Radio Stations and Newspapers.
- (6) A list of posters and notices that must be displayed on the job site bulletin boards. Contractors are informed that the bulletin board must be located in an area readily accessible to all applicants for employment and employees. All of the posters, except the Workers' Compensation Notice and the EEO Policy Statement and Notices, are provided to the contractor by the Department. The list of notices provides examples of a company EEO policy statement, a notice encouraging employees to refer minority and female applicants for employment, a notice informing employees of an available training program and the entrance requirements, complaint procedures, a notice identifying the company EEO officer by name and including the address and telephone number where the EEO officer can be reached, work environment statement, certification of nonsegregated facilities and a notice to unions disseminating EEO commitments and responsibilities and requesting their cooperation.
- (7) Federal-aid construction reporting requirements. The External EEO Coordinator discusses the procedure for preparing and submitting Forms PR-1391 and EEO-1 as applicable.

- b. On Federal-aid projects that contain the TPSP, the following information is provided, as well as the information in Paragraphs (a) (1-7):
 - (1) The RE reviews the Training Commitment Form (TCF) to ensure there is adequate time to train employees to journeyman status in classifications selected by the contractor.
 - (2) Pamphlets distributed at these conferences contain a list of the On-the-Job Training Program Reporting Requirements. The list identifies each form (Registration Card and Termination Form), the submission frequency and the necessary distribution. The contractor is given a thorough explanation of each form.

- 2. The External EEO Coordinator will only attend Federal-aid project preconstruction conferences as stated in Contractor Indoctrination, Item C-1.

The contractor is instructed to maintain records relative to the EEO/Affirmative Action Program for a period of at least three (3) years following project completion.

III. CONTRACT SANCTIONS

- A. The Arkansas Department of Transportation will take affirmative action to include the imposition of contract sanctions and the initiation of appropriate legal proceedings under applicable State or Federal law, if necessary, to achieve equal employment opportunity on all Federal-aid highway projects. The Department will actively cooperate with the Federal Highway Administration and the Office of Federal Contract Compliance Programs in all investigations and enforcement actions initiated by either agency. Sanctions imposed by the Department will be reviewed by the Legal Division, prior to issuance, to ensure legal sufficiency.
- B. The Department has a procedure for withholding a contractor's progress payments for failure to comply with EEO requirements.
- C. The following laws are applicable:
 - 1. Civil Rights Act of 1964
 - 2. EO 11246 as amended by EO 11375
 - 3. EO 11764
 - 4. Federal-aid Highway Act of 1968, 1970
 - 5. 49 CFR Part 23
 - 6. Americans with Disabilities Act of 1990
- D. In the event of a contractor's noncompliance with the nondiscrimination provisions of the contract, the Department shall impose such contract sanctions as it or the Federal Highway Administration may determine to be appropriate, including but not limited to:
 - 1. Withholding of payments to the contractor under the contract until the contractor complies, and/or
 - 2. Cancellation, termination or suspension of the contract, in whole or in part. The contractor will be notified of the deficiency/violation and given a reasonable (preferably a mutually agreed upon) period of time for corrective action. If corrective action has not been initiated in the specified time period or it appears the contractor has not exerted a good faith effort to comply, sanctions will be imposed.

IV. COMPLAINTS

- A. The investigation and processing of all alleged complaints of discrimination received by the Department against the highway contractor will be accomplished by the External EEO Coordinator.

When an allegation of discrimination is filed directly with the Department or if the Department is notified that an allegation has been filed with other Federal, State or local authorities, the Department will:

1. Notify the appropriate agency (Federal Highway Administration, Federal Transit Administration, Federal Railroad Administration, etc.) within 10 working days of the allegation. As a minimum, the following information will be included in every notification:
 - a. Name, address and telephone number of the complainant.
 - b. Name(s) and address(es) of alleged discriminating official(s).
 - c. Basis of complaint (i.e., race, color, religion, sex, national origin, disability, age).
 - d. Date of alleged discriminatory act(s).
 - e. Date complaint was received by the Department.
 - f. A statement of the complaint.
 - g. Other agencies (State, local or Federal) with which the complaint has been filed.
 - h. An explanation of the actions the Department has taken or proposes to resolve the issues raised in the complaint.
2. Acknowledge receipt of the allegation, informing the complainant of action taken or proposed to process the allegation and advising the complainant of other avenues of redress available within 10 working days.
3. Investigate the allegation and, based on the information obtained, determine whether or not discrimination occurred.
4. Prepare a report of findings.
5. Notify the complainant, within 45 days from receipt of the allegation, of the findings and the decision reached including proposed disposition of the matter. The notification will advise the complainant of avenues for appeal if dissatisfied with the decision. The proposed resolution will require action adequate to correct and prevent similar occurrences of discrimination.
6. Provide the appropriate agency with the decision and a summary of the findings within 45 days after receipt of the allegation.
7. Periodically inform the appropriate agency regarding the status of complaints.
8. Make informal attempts to resolve the matters. These informal attempts and their results will be synopsized in the report of investigations.

9. The procedure outlined herein will not prohibit interagency agreements between the Department and State or local Federal Employment Practice (706) agencies.
 10. The fact that an allegation has been filed directly with the Federal Highway Administration, Federal Transit Administration, Federal Railroad Administration, etc., will not relieve the Department, upon being informed of the allegation, of the responsibility for taking action, pursuant to its own internal procedures, to resolve the matter.
- B. The Department has developed a procedure for processing verbal complaints alleging discrimination. When an RE or EEO Field Inspector receives a complaint of alleged discrimination, the contractor will be given an opportunity to resolve the complaint. The following steps will be taken:
1. Notify the contractor within five days of the alleged discriminatory act and schedule a meeting with the company's EEO officer or an authorized company representative and the complainant in order to discuss the complaint. This meeting will be documented thoroughly.
 2. If the complainant is satisfied with the company's proposal to resolve the complaint, the Section Head – EEO/DBE will be furnished a copy of the minutes of the meeting. The minutes will be signed by the complainant and the company's EEO officer or authorized representative. A report of complaints resolved in this manner will be prepared and submitted to the Division Office of FHWA on a quarterly basis.
 3. If the complainant is dissatisfied with the company's proposal to resolve the complaint, the complainant will be instructed to submit the complaint in writing to the Section Head – EEO/DBE. The Section Head – EEO/DBE will be furnished a copy of the minutes of the meeting. The minutes will be signed by the complainant and the company's EEO officer or authorized representative. All written complaints will be investigated and processed in accordance with the procedure described in paragraphs A. (1-10) of this section.
- C. When a RE or an EEO Field Inspector is notified that a complaint alleging discrimination has been filed with other Federal, State or local agencies by employees or applicants for employment of contractors holding Federal-aid contracts, the Section Head – EEO/DBE will be notified immediately.

In order to avoid duplication of effort, the Section Head - EEO/DBE will maintain contact with the agency regarding the progress of its investigation and the final determination made on the issues in the case. The Division Office of FHWA will be apprised of the current status of external complaints in the annual EEO Program update.

V. **EXTERNAL TRAINING PROGRAMS - SUPPORTIVE SERVICES**

- A. A Training Program Special Provision is included in certain contracts. This provision identifies the procedure to follow in administering a training program.

The highway contractor, in order to have an approved Training Program, can decide on one of the following:

1. Become a member of the Associated General Contractors of Arkansas. Its training program has been approved by the U. S. Department of Labor, Manpower Administration, Bureau of Apprenticeship and Training and is periodically reviewed by the Office of Federal Contract Compliance Programs.
 2. Develop and submit a Training Program for the company to the Arkansas Department of Transportation for approval with the concurrence of the Federal Highway Administration.
 3. Submit documentation indicating affiliation with an agency that has an approved training program if the company is an out-of-state highway contractor.
- B. Semi-annually, the External EEO Coordinator will furnish to FHWA a progress report that contains the number of trainees enrolled, terminated and graduated. This information will be broken down by race, sex and training classification.
- C. The Program Management Division (PM) will select those highway projects where training can be provided. Projects selected will exceed an estimated cost of \$8,000,000. The TPSP will be included in the bid proposal with a Training Commitment Form (TCF). The TCF should be completed and submitted to the RE during the project preconstruction conference.

VI. DISADVANTAGED BUSINESS ENTERPRISES

The EEO Section is responsible for monitoring contractor compliance with the Disadvantaged Business Enterprise Program at the project level. This is done through a review of the Project Log, EEO Quarterly Field Reports, Initial EEO On-Site Inspections, Compliance Reviews and Verification Reviews.

When Federal-aid construction contracts are awarded, the required percentage of Disadvantaged Business Enterprise utilization is posted in the project log. The log is annotated to show DBE firms that are to be used when subcontract approval is received by the staff. The External EEO Coordinator monitors the log until a work start notice has been received.

The EEO Field Inspector will conduct an Initial EEO On-Site Inspection at the start of work by Disadvantaged Business Enterprises. During this inspection, it will be determined if the workers are permanent employees of the firm and if the equipment is owned by the firm.

Irregularities noted during inspections will be investigated and resolved. Any arrangements which are not consistent with standard industry practice, which serve no commercially useful function or in which the firm has relinquished control of the work will be reported to the State Construction Engineer by memorandum. The prime contractor and DBE subcontractor will be advised of the suspected irregularity by letter. A copy of the letter will be sent to the Section Head - EEO/DBE. The State Construction Engineer and the Section Head - EEO/DBE will review the issues in the memorandum and determine whether an investigation is necessary.

Contractors' compliance with the Disadvantaged Business Enterprise Special Provision in the contract is evaluated by the External EEO Coordinator during Compliance Reviews. Verification Reviews will be conducted to determine whether firms are eligible to participate in the program.

VII. **LIAISON**

The EEO Section maintains continuing liaison by correspondence, personal and/or telephone contact with minority, female and disabled organizations, individuals, educational institutions, elected officials, contractor organizations and agencies performing similar or related duties. The information disseminated by the Section relates to the Department's policies and procedures to ensure contractor compliance with equal employment requirements.

VIII. INNOVATIVE PROGRAMS

EXTERNAL YOUTH OPPORTUNITY PROGRAM

Each summer the Department promotes an External Youth Opportunity Program (EYOP) designed to provide meaningful work experience in highway construction for the State's youths, ages 18-21.

The External EEO Coordinator reviews the Department's Construction Division Job Report and selects those Federal-aid Highway Construction Projects that may provide employment opportunities during the summer. The criteria for selecting projects are job completion and time remaining on the project.

The prime contractor is identified from this information. A contractor's list is developed by county and contains the name of the company's EEO Officer, address, and telephone number. A material supplier's list is also maintained by county. New suppliers are added to the list based on information obtained from Project Specific and Areawide Reviews conducted the previous year.

Letters promoting the EYOP are sent to universities, colleges, technical institutions, minority organizations, minority state legislative members and high schools near the projects. Enclosed with the letter is a list of prospective employers and/or a summary of the previous year's effort.

A letter is also mailed to each contractor and material supplier promoting the EYOP and requesting each to give consideration to hiring youths ages 18-21 during the summer season. Each contractor and material supplier is also requested to make a special effort to recruit and hire minorities and/or females. Enclosed with the letter is Form AHTD-EYOP which is used to report each firm's total youth employment broken down by race, sex, job classification, average wage rate, and educational data.

At the conclusion of each summer campaign, a letter will be sent to participating highway construction contractors and material suppliers expressing the Department's appreciation. The three companies employing the highest number of youths will be presented Certificates of Appreciation.