

Jan. 2025

## Civil Rights Compliance Requirements

---

The purpose of this document is to outline the Civil Rights Compliance Requirements to ensure your firm is meeting the responsibilities as set out in FHWA 1273 within the contract documents for the projects named above.

### Job Site Posters:

#### **POSTERS BOARD MUST BE DISPLAYED PRIOR TO THE START OF PROJECT!**

The job site posters, including wage rates, should be in an outside location where they can be seen easily by all employees. **The contractor is responsible for printing the posters and filling out any required information before posting.**

Use the links below to print a copy of the required posters.

- [“Know Your Rights”](#) – (This poster replaces the “EEO is the Law” and the “EEO” is the Law” Supplement poster). **Note: ALL pages of this poster must be displayed!**
  - [Employee Rights Under the Davis-Bacon Act](#)
  - **Please use the applicable wage rates as outlined in the contract documents** - ALL pages of the wage rates must be displayed!
  - [Federal Minimum Wage Poster \(WH 1088\)](#) – **Only for projects where Davis-Bacon rates do not apply**
  - [Pay Transparency](#)
  - [Safety and Health Protection on the Job](#)
  - [Employee Rights Under the Family and Medical Leave Act](#)
  - [Employee Rights – Employee Polygraph Protection Act](#)
  - [Your Rights Under USERRA: The Uniformed Services Employment & Reemployment Rights Act](#)
  - [Form FHWA](#) – Add Resident Engineers name in box that says, “State Transportation Agency”.
  - [Contractor Equal Employment Opportunity Statement Poster](#) – Add EEO Officer name and Contact Info
  - [Emergency Phone Number](#)
  - [CA101- VT Minimum Labor & Truck Rates](#)
- 
- If the project does not have a job office due to the nature of the work and/or the length of the contract, the posters must be displayed at the home office where hiring is conducted, and each employee must be provided copies of all the notices or posters and sign a [statement](#) acknowledging they received them.

- Have questions about Job Site Posters? Click here: [Job Site Posters FAQs – with examples!](#)

### Labor Compliance – Certified Payroll:

- All payrolls (prime and subs) should be submitted 7 days from the employee pay date using the submission tool outlined in the contract documents.
- Primes should review subcontractor payrolls before submitting.
- If using fringe benefits to meet the total rate, fringe detail must be attached to each payroll.
- Each payroll should be a separate submission and include a cover page.
- If additional work classifications are needed submit as soon as possible to avoid restitution. Request must be on [SF 1444](#). (Subcontractors must submit request through the Prime Contractor).

### On-The-Job Training (OJT):

- There are **N/A** training hours assigned to this project. *(Only if applicable, please refer to your contract documents.)*
- The OJT Program Manager, [Karen Brouillette](#), must approve each trainee placement, including proposed wages and the date on which the training program will start. Additional information can be found here: [OJT Contractor Information](#).

### DBE/Prompt Pay/Contractors Reporting:

- DBE Program Goals: Please be advised that in accordance with 49 CFR Part 26, the Vermont Agency of Transportation (VTrans) has established proposed overall goals on all federal-aid contracts for Disadvantaged Business Enterprise (DBE) Participation. Please click [here](#) to view goals.
- A contract specific DBE goal of **N/A** has been established for this project. [DBE Directory](#) is available online. *(Only if applicable, please refer to your contract documents.)*
- [Prompt Pay Requirements](#): Vermont's Prompt Pay Statute requires payment from prime to all subs within seven days of prime receiving payment. Payments should be made to all subcontractors by the 10<sup>th</sup> of each month using the attached Prompt Pay Manual Reporting Form. This form should only be used if you **do not** have access to the online system.
- FHWA Form 1391 (Annual EEO Report): All firms that worked on one or more federally funded VTrans project as a prime or subcontractor during the last full pay period ending in July are required to complete the FHWA 1391 report. The report should be submitted using our online Contractors Reporting system. Email notification will be sent out mid to late August. Additional information can be found in our online [Contractor Center](#).

## Equal Employment Opportunity (EEO):

The contract provisions (FHWA-1273) are attached to all federal-aid construction projects with the VTrans. We encourage you to utilize our [Equal Opportunity Toolkit for Contractors](#) for tips on meeting this and other equal opportunity requirements.

At a minimum, VTrans will test compliance on the following requirements:

- Every contractor is required to have a designated EEO Officer and to make sure their employees know who that person is. Our records indicate your company EEO Officer is \_\_\_\_\_ . Please notify us of any changes.
- Post the [EEO Policy Statement poster](#) provided by VTrans with EEO Officer name and contact information.
- Hold semi-annual EEO-related meetings, conducted by the EEO Officer, with management, supervisors, and office staff who are responsible for personnel actions.
- All personnel who are engaged in direct recruitment for the project were instructed by the EEO Officer in the contractor's procedures for locating and hiring minority group employees.
- This company's EEO policy was reviewed and reaffirmed within the last 12 months and was brought to the attention of all our employees by the following means: Meetings/Briefings, Employee Handbook.
- A written record was made of the above meetings/briefings, person's attending and the subject matter that was discussed. Signed acknowledgements of attendance at EEO meetings/training are on file.

## Other Useful Information:

- Any site visits to assure compliance on the project, will be scheduled with the Resident Engineer.
- [Who Ya Gonna Call](#)
- Need additional information: please visit our online [Contractor's Center](#).

Please contact me with any questions.

Thank you,  
Sonya

Sonya Boisvert | Civil Rights Program Manager  
Bureau of Civil Rights  
Vermont Agency of Transportation  
219 North Main Street | Barre, VT 05641  
[802-279-1330](tel:802-279-1330) | [sonya.boisvert@vermont.gov](mailto:sonya.boisvert@vermont.gov)  
[vtrans.vermont.gov/civil-rights](https://vtrans.vermont.gov/civil-rights)