



# BIPARTISAN INFRASTRUCTURE LAW DAVIS BACON ACT COMPLIANCE USING LCP TRACKER

With Monitoring and Reporting Guidance for BIL DBA  
Funding Recipients

February 2024



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## Guide Purpose

Provide an overview of the software and associated processes that will support Davis Bacon Act (DBA) compliance for Bipartisan Infrastructure Law (BIL) projects. This guide does not provide guidance on broad DBA policies or procedures. For more information on DBA, see [DOE DBA Desk Guide](#) and [DOE DBA FAQs](#).

## Applicability

BIL Title XI, Section 41101, applies wage rate requirements under DBA for construction, alteration, or repair work on BIL activities. This means that laborers and mechanics performing construction, alternation or repair on BIL projects shall be paid wages at the rates not less than those prevailing on similar projects in the locality as determined by the Secretary of Labor. In the case of a multi-phase project, DBA and associated compliance activities would not be triggered until the start of construction. For more information, see [DOE DBA Desk Guide](#).

BIL Section 40551 provides an exception for the Weatherization Assistance Program (WAP) wherein DBA only applies to multifamily buildings with 5 or more units.

DBA and use of LCPtracker applies to all BIL funding instruments (Funding Opportunity Announcement [FOA], Administrative and Legal Requirements Document [ALRD], rebates, incentives, credits, etc.) that include construction, alteration, or repair work. DBA and use of LCPtracker does not apply to projects funded by the Inflation Reduction Act (IRA) or annual appropriations. While DBA applies to acquisitions, LCPtracker is not intended for use by acquisitions.

## Definitions

**Acceptance:** In LCPtracker, prime recipients accept or reject CPRs following the steps in the [Prime Approver Guide](#) (*Reviewing and Approving Payrolls* section). If accepted, the CPR is locked and is available in LCPtracker for the reviewer(s). If the CPR is rejected, then the party associated with the rejected CPR will be notified to take action.

**Approval:** In LCPtracker, subrecipients/contractors with Prime Approver rights review lower tier subcontractor CPRs and approve or reject. Once approved, the CPRs are sent to the prime recipient to accept/reject.

**Certified Payroll Report (CPR):** In LCPtracker, a CPR is an official compliance document that details the worker's information, classification, wages, benefits, and hours worked. On Davis Bacon projects, the form typically used is federal form [WH-347](#) — or what some people would call a Davis Bacon certified payroll report.

**Collective Bargaining Agreement (CBA)** Also referred to as “bargaining agreement” and sometimes known as a “labor-management agreement” or “union contract.” These terms refer to an agreement between an employer and a union establishing wages, hours, and other terms and conditions of employment for employees in the bargaining unit represented by the union.

**Contractor:** a legal entity contracted by the prime or subrecipient to provide goods and/or services within normal business operations, provides similar goods or services to many different purchasers,



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operates in a competitive environment, provides goods or services that are ancillary to the operation of the Federal program..

**Prime Recipient:** the entity which received an award or agreement directly from DOE to carry out an activity under a federal program. The term recipient does not include subrecipient.

**Subrecipient:** a legal entity to which a subaward is made, who has performance measured against whether the objectives of the Federal program are met, is responsible for programmatic decision making, must adhere to applicable Federal program compliance requirements, and uses the Federal funds to carry out a program of the organization.

**Wage Determination (WD):** A WD is the list of basic hourly wage rates and fringe benefit rates for each classification of laborers and mechanics ("labor classification") in a predetermined geographic area for a particular type of construction, as established by the DOL Wage and Hour Division. The WD identifies the specific information to be loaded into LCPtracker for a particular project. In some cases, the WD is known at award and in others at a later time. In cases where there is a CBA or a WD is not available in SAM.gov, a separate process exists via Office of General Counsel (OGC)/DOL for conformance/conversion to a specific WD for the project/prime (*DOE BIL DBA guidance on conformance is forthcoming*). Note that this process can take up to 60 days.

## Roles and Responsibilities

### DOE Roles and Responsibilities

Role	Responsibility
Contracting Officer (CO)/ Grants Officer (GO)  (LCPtracker Administrator Role = Business Manager)	<ul style="list-style-type: none"><li>• Ensures that DBA requirement is included in the Announcement and Award Documents when applicable</li><li>• Reviews and approves/rejects recipient requests for waivers from using LCPtracker</li><li>• Incorporates WD(s) into the award (term or award package)</li><li>• Issues non-compliance notifications and corrective actions in coordination with TPO and BIL DBA Compliance Support team</li><li>• Monitors payroll in LCPtracker as needed</li><li>• Supports DBA site visits as needed; can be included in DOE site visits</li></ul>
Technical Project Officer (TPO)  (LCPtracker Administrator Role = Business Manager)	<ul style="list-style-type: none"><li>• Verifies WD set-up information submitted by recipient for inclusion in LCPtracker</li><li>• Sends project Information to DBA Compliance Support no later than 1 month prior to start of construction</li><li>• Ensures that recipients submit semi-annual reporting and reviews</li><li>• Monitors certified payrolls in LCPtracker as needed</li><li>• <a href="#">Resolves concerns or deficiencies</a> with CPRs as needed</li><li>• Supports DBA site visits as needed</li><li>• Works with the CO/GO on any instances of failure to comply with missing or non-compliant payrolls or reports</li><li>• Rejects CPRs in LCPtracker when needed</li></ul>



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<p>BIL DBA Coordinator</p> <p>(LCPtracker Administrator Role = Full Admin)</p>	<ul style="list-style-type: none"> <li>• Supports CO/GO in determining hardship waivers</li> <li>• Maintains a list of all recipients who have received a hardship waiver</li> <li>• DOE lead and Contracting Officer Representative for LCPtracker and BIL DBA Compliance Support contract.</li> <li>• Maintains tracker of all BIL projects required to submit DBA information and provides reports on progress as needed</li> </ul>
<p>BIL DBA Compliance Support</p> <p>(LCPtracker Administrator Role = Full Admin)</p>	<ul style="list-style-type: none"> <li>• Completes the Wage Entry Request Form and submits to LCPtracker team</li> <li>• Sets up the project in LCPtracker using established naming convention</li> <li>• Provides access to LCPtracker for DOE staff and recipients 1 month prior to first payroll being due <ul style="list-style-type: none"> <li>• Includes verification of identity</li> </ul> </li> <li>• Conducts DBA site visits as necessary and in coordination with Integrated Project Team (CO/GO, TPO, and others as defined by the team)</li> <li>• Performs day-to day activities in LCPtracker</li> <li>• Monitors payroll in LCPtracker weekly</li> <li>• Sends notifications to CO/GO and TPO of reporting non-compliance and/or any issues with submitted certified payroll reports</li> <li>• Coordinates LCPtracker training</li> <li>• Provides oversight of compliance in coordination with CO/GO and TPO</li> </ul>
<p>Office of the General Counsel (OGC)</p> <p>(LCPtracker Administrator Role = Business Manager)</p>	<ul style="list-style-type: none"> <li>• Provides legal advice on DBA matters</li> <li>• Serves as primary point of contact for DOL</li> <li>• Compiles the recipient submitted <a href="#">Semi-Annual DBA Enforcement Report</a> into a single DOE report and submits to DOL</li> <li>•</li> </ul>
<p>LCPtracker Support</p>	<ul style="list-style-type: none"> <li>• Enters WD information into LCPtracker</li> <li>• Staffs a Helpdesk to provide technical support with submitting CPRs and other technical issues</li> <li>• Provides system training as needed</li> </ul>
<p>Department of Labor (DOL)</p>	<ul style="list-style-type: none"> <li>• Reviews DOE <a href="#">Semi-Annual DBA Enforcement Report</a></li> <li>• Notifies DOE CO/GO of any issues they have discovered or have been brought to their attention regarding DBA compliance at an award level.</li> <li>• Notifies OGC if there is an overarching issue at a DOE level.</li> <li>• Establishes WD</li> </ul>



## Recipient Roles and Responsibilities

Role	Responsibility
Prime Recipient (In some cases, such as formula funding, the Prime Recipient may delegate these activities to a Subrecipient)	<ul style="list-style-type: none"><li>• Submits proposed WD(s) or CBA(s) for set-up information in LCPtracker for prime recipient and all subrecipients and contractors to the TPO as soon as possible and no later than 1 month prior to start of construction</li><li>• Notifies TPO/CO if they have a Collective Bargaining Agreement (CBA). A CBA will need a separate process of being sent to DOL for conformance/conversion to a specific WD for the project/prime.</li><li>• Provides access to LCPtracker for subrecipients and subcontractors<ul style="list-style-type: none"><li>• Includes verification of identity</li></ul></li><li>• Ensures that DBA requirements flow down to subrecipients and subcontractors</li><li>• Monitors all weekly payroll submissions (prime, subs, and contractors)</li><li>• Ensures compliance with weekly payroll submissions and works with subrecipients/subcontractors to correct submissions as needed</li><li>• Submits <a href="#">Semi-Annual DBA Enforcement Report</a></li><li>• Notifies TPO of any concerns with DBA compliance</li></ul>
Subcontractor/Subrecipient	<ul style="list-style-type: none"><li>• Submits proposed WD(s) or CBA(s) for itself and all subs to prime recipient</li><li>• Provides access to LCPtracker for subrecipients and subcontractors<ul style="list-style-type: none"><li>• Includes verification of identity</li></ul></li><li>• Ensures that DBA requirements flow down to subrecipients and subcontractors</li><li>• Monitors all weekly payroll submissions (Itself and subs)</li><li>• Ensures compliance with weekly payroll submissions and works with subs to correct submissions as needed</li></ul>
Subs (subrecipient, subcontractors)	<ul style="list-style-type: none"><li>• Submits proposed WD(s) or CBA(s) to prime recipient or subcontractor/subrecipient</li><li>• Submits weekly payrolls to LCPtracker</li></ul>

## LCPtracker

### LCPtracker Functionality

DOE has secured DBA services, including third-party DBA electronic payroll compliance software system LCPtracker, that will facilitate the submission and review of certified payroll reports (CPRs), including all information captured in the [WH-347](#) for DOE and recipients. DOE is providing access to LCPtracker for BIL funding recipients at no cost.



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Through LCPtracker, certified payroll is uploaded and subject to a validation system that checks for DBA prevailing wage requirements by flagging mathematical errors or omission discrepancies for Administrator review on a report. Examples include base hourly rate, total hourly rate, overtime, double-time, apprentice approval, and fringe benefit contributions. Additionally, LCPtracker utilizes industry-standard eSignature technology, allowing Contractors to electronically sign payroll reports versus using a wet signature.

Advantages of DBA compliance software include:

- Minimized paperwork
- Reduced time spent reviewing CPRs
- Reduced risk of errors and audit failures
- DOE compliance services
- DOE and recipient cost reduction
- Real-time reporting by BIL provision
- Visibility into key workforce and demographic priority metrics (e.g., total jobs, union jobs, disadvantaged community jobs, apprentices/trainees, Justice 40 goals)

LCPtracker's data collection, analysis, and reporting functions allow users to monitor and report progress toward local hiring, diversity, and apprentice utilization objectives. The system's labor compliance enforcement component will allow DOE to track investigations and restitution processes.

### LCPtracker Requirement

Recipients of BIL-funded projects subject to DBA must ensure the timely electronic submission of weekly certified payrolls through LCPtracker as part of their compliance with DBA. The only exception to LCPtracker use is if a recipient receives a waiver because it is unable or limited in its ability to use or access LCPtracker (e.g., recipient has no or limited Internet access).

A recipient already using an instance of LCPtracker would need to use DOE's LCPtracker database for any BIL-funded project. A pre-existing instance of LCPtracker may not be configured to DOE's required specifications. All BIL-funded projects must be in DOE's LCPtracker database unless they have an approved waiver (see [Hardship Waivers](#)).

LCPtracker currently partners with [27 commercially available payroll systems](#). Users should coordinate with their payroll system provider to obtain a weekly upload file for LCPtracker.

If an organization uses a payroll system not listed as an LCPtracker "preferred provider," a free spreadsheet template is available to map payroll files for upload into LCPtracker.<sup>1</sup>

### Hardship Waiver

Recipients may request a waiver if they are unable or limited in their ability to use or access LCPtracker (e.g., rural and remote recipients with limited broadband access). In those situations, compliance monitoring must be designed on a case-by-case basis (e.g., submittal of hardcopy [WH-347](#) certified

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<sup>1</sup> The spreadsheet can be found in the system by accessing the "1. Payroll Records" tab, clicking the "Upload Records" button, and clicking the blue hyperlink at the bottom of the screen.





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payroll form or similar format via regular or electronic mail to the Contracting Officer (CO)/Grants Officer (GO).

Recipients should notify DOE as early as possible regarding their request for a waiver, ideally at time of negotiation.

Waiver requests should be submitted to the CO/GO and Technical Project Officer (TPO) and include:

- Selectee name
- FOA and Project Title information
- Waiver duration: Is the request for a set duration or the entirety of the award?
- A detailed waiver justification statement
- A detailed description of how the recipient will provide certified payrolls

Waivers are reviewed by the CO/GO in consultation with the DBA BIL Coordinator. Waivers are typically processed within 2 weeks.

## LCPtracker Training and Help Desk

LCPtracker will provide live virtual and on-demand training for Administrators, Contractors, and Prime Approvers. Required training is shown below, with full details and dates available in Appendix C.

	Administrator (Prime Recipient) (1 hour each)	Prime Approver (Prime Recipient, Subrecipient/ Subcontractor) (1.5 hours)	Contractor (all) (1 hour each)
LCPtracker Pro Live: Payroll Entry		X	X
LCPtracker Pro Live: Overview	X		
LCPtracker Pro Live: Settings	X		
LCPtracker Pro Live: Setup, eDocs, Reports	X		
LCPtracker Pro Live: Hands-On User Setup	X		
Daily Reporter: Daily Logs	X		X
As-Needed LCPtracker Pro Live Training Sessions			X

A comprehensive guide to LCPtracker training, including accessing online training through the system, is available on the [LCPtracker website](#).

The LCPtracker development team automatically handles any system patches, upgrades, and support. Electronic payroll system help desk services are available during core business hours of operation



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regardless of time zone: Monday through Friday (excluding Federal holidays) from 5:00 AM to 5:30 PM PST. To contact the Help Desk, users can email [support@lcptracker.com](mailto:support@lcptracker.com) or call (714) 669-0052 and select Option 4.

### Accessing LCPtracker

LCPtracker is accessible via Internet browser. Supported browsers include Microsoft Edge, Google Chrome, Firefox, and Opera. The following parties provide user access to LCPtracker:

- **Prime Recipient:** Set up by DOE
- **Subrecipient/Contractor:** Set up by the prime recipient
- **First Tier Contractor/Subcontractor:** Set up by the prime recipient or subrecipient/contractor
- **Lower Tier Subcontractor:** Set up by the contractor/subrecipient

DOE provides recipients access within 5 days of receipt of required information (see [Getting Set Up in LCPtracker](#) for required information.) DOE may delegate responsibility for providing access to other parties (e.g., prime recipients, subrecipients). The level of access for each party is limited by their role to ensure system security, as described in the following sections.

### Administrator Roles in LCPtracker

Administrator roles in LCPtracker determine restrictions on access to confidential information. The prime recipient Administrator has one of eight possible Administrator roles in LCPtracker. A comprehensive guide to LCPtracker Administrator roles is available [here](#).

### Prime Approver Roles in LCPtracker

The prime recipient Administrator sets up the subrecipients/subcontractors in LCPtracker and assigns them a Prime Approver role for the project. As a Prime Approver, the subrecipients/subcontractors can assign other contractors to the project and review/approve CPRs.

In cases where there are two or more subrecipients/subcontractors, the prime recipient takes the role of Prime Approver. The prime recipient may also choose to delegate this role to one of the lead subrecipients/subcontractors.

### Contractor Roles in LCPtracker

The prime recipient and/or subrecipients/subcontractors sets up the first tier contractor/subcontractor in LCPtracker and assigns them the Contractor role. In the Contractor role, the contractor/subcontractor can enter employees working on a project into the system, submit weekly CPRs for all work performed on a project, submit CPRs for approval/acceptance, and run limited reports. (They will not have administrative access unless they are assigned as a Prime Approver. In this case, contractors would have two separate LCPtracker log-in user IDs: one to enter CPRs and one to approve CPRs). Contractors/subcontractors can add additional lower tier subcontractors.

## BIL DBA Monitoring and Reporting Process

To effectively manage its DBA compliance and enforcement obligations, DOE has established a comprehensive set of procedures covering monitoring and reporting. This procedure establishes a method of monitoring recipients' compliance with DBA requirements and specifies steps for effective and timely reporting of the status of these efforts to relevant internal and external parties.



## I. Pre-Award/Negotiation Activities

1. **TPO and CO/GO** ensure that DBA requirements and use of LCPtracker are included in Announcement and Guidance documents for applicants.
2. **TPO and CO/GO** share standard DBA requirements information and LCPtracker requirements with selectees during negotiation kickoff calls and other pre-award meetings.
3. **Selectee** submits [Hardship Waiver](#) request to the CO/GO and TPO, if applicable.
4. **Selectee**
  - a. Provides proposed set-up information for all asterisked items in [LCPtracker Project Information Intake](#) and WD(s) from <https://sam.gov/content/wage-determinations> based on location(s) of work and type of work for LCPtracker set-up and sends to TPO along with the names of all prime recipient staff who will need access to LCPtracker to submit and/or review weekly payroll submissions and establish roles for any subs or contractors. See [Setting up the Project in LCPtracker](#) for more information.
    - i. In cases of a CBA, sends all DBAs to TPO who sends to DOL for confirming into a WD. Note that this process can take up to 60 days.
  - b. Updates the budget and budget justification, if needed, based on the WD.
5. **TPO** ensures that the Direct Jobs reporting and DBA Semi-Annual Labor Compliance Report are selected on the [Federal Assistance Reporting Checklist \(FARC\)](#) or otherwise communicated to the selectee for funding mechanisms that do not use the FARC and have projects subject to DBA.
6. **CO/GO** ensures that the DBA requirements terms and required use of LCPtracker are included in the Terms and Conditions and that all known WD numbers (including revision number and date) are incorporated into the award as an attachment or by reference.

## II. Getting Set Up in LCPtracker

**Note:** it is a best practice to complete the steps below as early as possible and no later than 1 month prior to the beginning of construction activities. This may be an iterative process as all locations, contractors, and WDs may not be known at the same time. For a process map of the following steps, see [Figure 1: Process Map for Getting Set up in LCPtracker](#).

1. **Setting up the Project in LCPtracker**
  - a. **Prime Recipient:** For all WDs not submitted at negotiation, the prime recipient must submit proposed set-up information for all known WD(s) or CBAs no later than 1 month prior to construction activities to the TPO and, if not provided at negotiation, provides the names of all prime recipient staff who will perform administrative roles in LCPtracker. Please note, for projects with a CBA, it can take up to 60 days to receive a conformed WD so this process should be started at least 90 days prior to construction.
    - i. Updates budget and budget justification, if needed, based on the WD.
  - b. **TPO:** Upon receipt of the WD, the TPO will confirm the wage determination is appropriate based upon the location where the work will be performed and the nature of the construction project. The TPO will notify the DBA Compliance Support Team of the need to set up a new project.
  - c. **DBA Compliance Support Team:** Creates the project in LCPtracker using the following naming convention: Recipient Legal Name (from [SF-424](#) or STRIPES) and DOE Award Number and ensures that appropriate WDs are associated with the project in LCPtracker.



## 2. Set up Users in LCPtracker

### a. **DBA Compliance Support Team:**

- i. Sends the [Admin Intake Form](#) to all applicable parties to collect the information needed to create their account.
- ii. Creates Administrator roles for the prime recipient and COs/GOs and TPOs. A comprehensive guide to LCPtracker Administrator roles is available [here](#).

### b. **Prime Recipient:**

- i. Sends the [Admin Intake Form](#) or [Contractor Intake Form](#) as needed for other users within their organization as well as subrecipients and contractors, as applicable.
- ii. Creates Administrator roles as needed for users in their organization and subrecipients.
- iii. Creates Contractor roles as needed for subrecipients and contractors.

### c. **Contractors/Subrecipients:** Creates roles as needed for any lower tier subcontractors using the Contractor Role Intake Form. Only the main user ID to the account at the Prime Recipient level will have the ability to add or edit additional users.

### d. In all instances

- i. Users requiring system access will appear in person or virtually (on camera) and provide identification as specified in the [Admin Intake Form](#) or [Contractor Intake Form](#).
- ii. Users will receive an email from LCPtracker notifying them that they have been added to the DOE database and have been assigned to a project.
- iii. Users can access LCPtracker via [www.lcptracker.com](http://www.lcptracker.com) by clicking on “LOG IN” in the upper right corner.

The [Administrator User Manual](#), [Prime Approver Guide](#), and [Contractor User Manual](#) provide step-by-step instructions for Administrator, Prime Approver, and Contractor roles.

## 3. Schedule and Complete LCPtracker Training

Before beginning work in the system, and 14–21 days before construction commences, users must sign up for and complete all required virtual live training sessions for their LCPtracker role (i.e., Administrator, Contractor, Prime Approver), described above in [LCPtracker Training and Help Desk](#).

A schedule of upcoming live training is found on the [DOE BIL DBA website](#). To attend a live session, please register no later than the day before by emailing [training-DOE-BIL-DBLS@lcptracker.com](mailto:training-DOE-BIL-DBLS@lcptracker.com). Users may also access online training through the system, which is available on the [LCPtracker website](#).

If users are unsure what their role in LCPtracker is, they should log in to LCPtracker, click Dashboard on the left panel, and then click the LCPtracker Pro tile. The system will verify their identity and then display their account and LCPtracker role.

Figure 1 depicts Steps 1–4 of the *Steps Performed Upon BIL Funding Award* process.

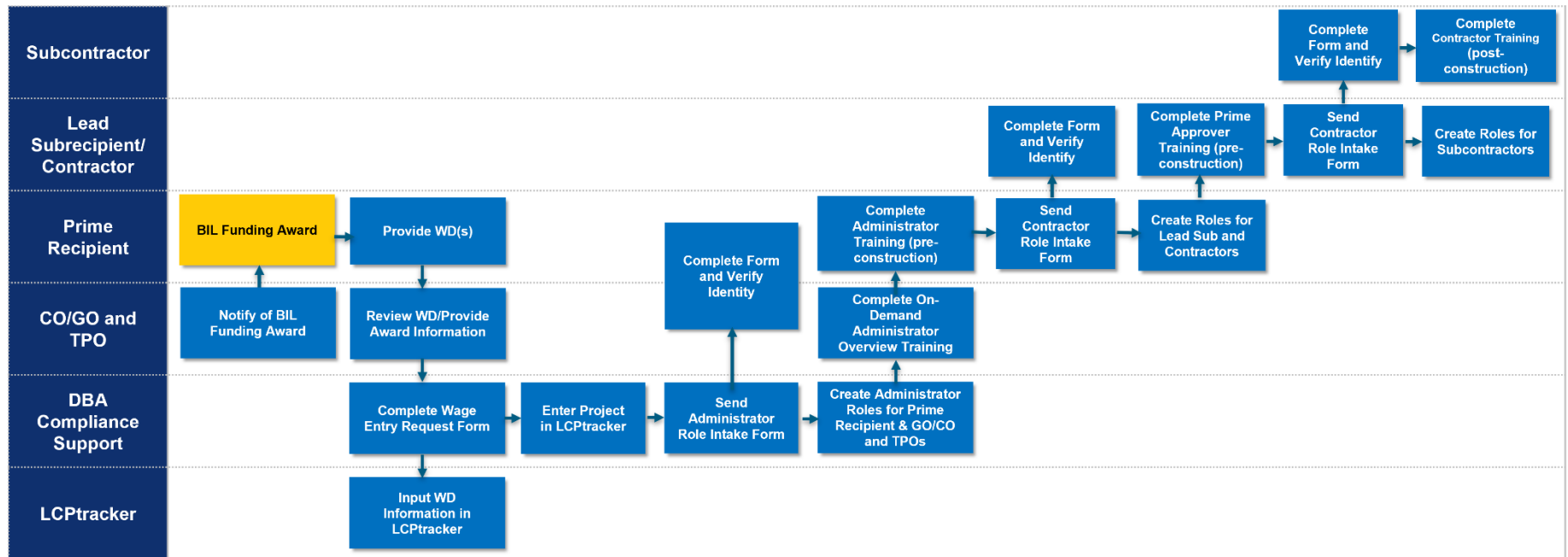


Figure 1: LCPtracker Process Flow: Setup Through Training



### III. Weekly Activities during the Construction Phase

#### 1. Submit CPRs

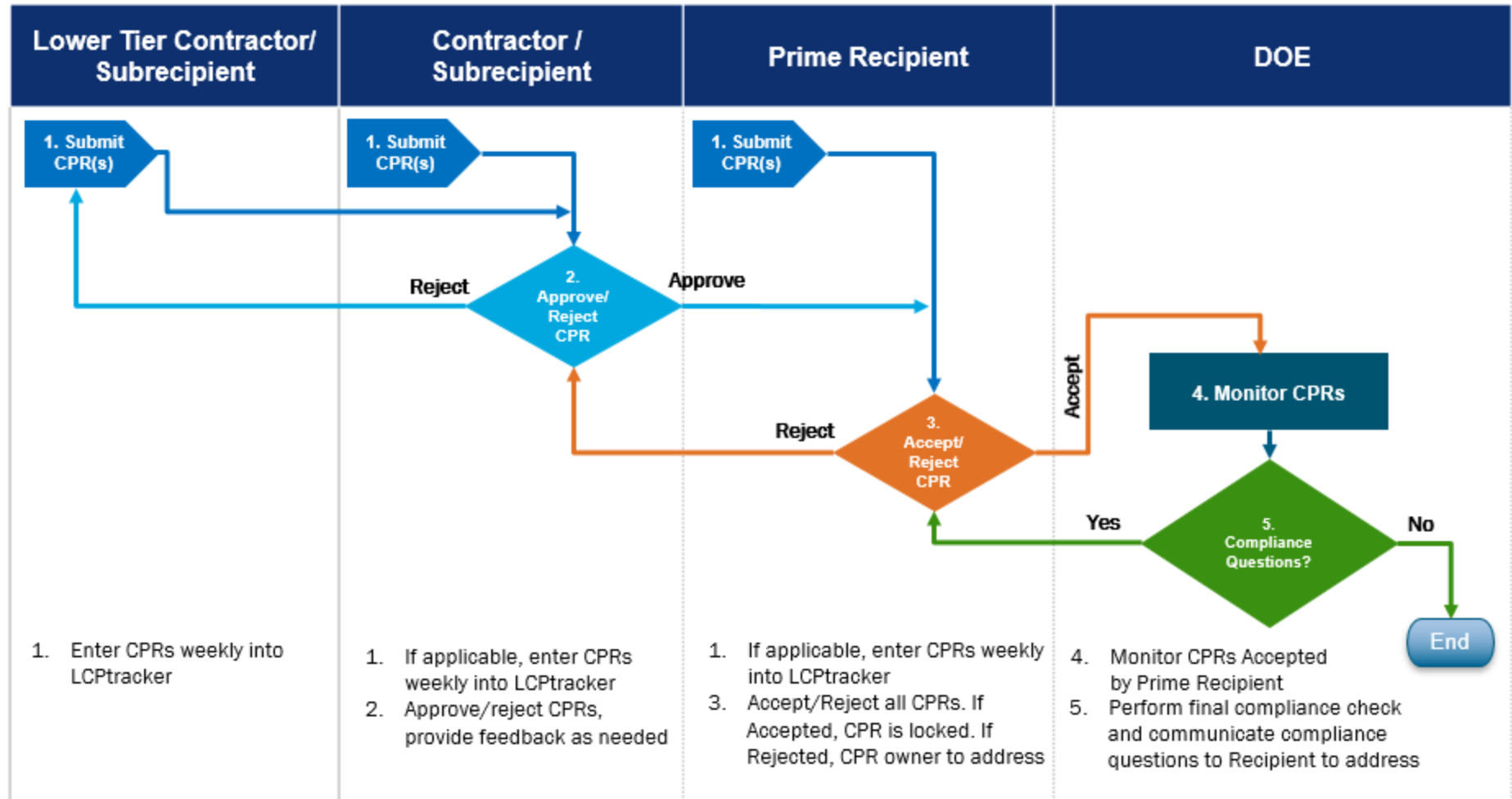
- a. **Prime Recipients, Subrecipients, and Contractors** conducting construction activities are required to submit CPRs weekly to LCPtracker. The [Contractor Quick-Start Guide](#) provides detailed steps for submitting CPRs.
- b. **LCPtracker** performs 70+ validations on each CPR. Potential errors in wage rates or work classification entries are flagged preemptively, allowing users to submit CPRs with corrections implemented.
- c. **LCP Helpdesk** provides technical support for CPR submissions: 714-669-0052 x 4 [support@lcptracker.com](mailto:support@lcptracker.com).

#### 2. Approve, Accept, or Reject CPRs

- a. **Subrecipients/Contractors** with Prime Approver rights review lower tier subcontractor CPRs and approve or reject. Once approved, the CPRs are sent to the prime recipient to accept/reject. Subrecipients/contractors without Administrator rights can review lower tier subcontractor CPRs and provide feedback but cannot approve or reject them.
- b. **Prime Recipients** accept or reject CPRs in the LCPtracker system following the steps in the [Prime Approver Guide](#) (*Reviewing and Approving Payrolls* section). If accepted, the CPR is locked and is available in LCPtracker for the reviewer(s). If the CPR is rejected, then the party associated with the rejected CPR will be notified to take action. Some common reasons for rejecting a CPR are:
  - i. No deductions/non-permissible deductions
  - ii. Time tracking inconsistent with industry standards
  - iii. Missing signed authorization form for other deductions
  - iv. WD type does not match work being performed
  - v. Apprentice ratios
  - vi. Always only reporting 40 hours
- c. In some cases, such as DOE formula funding, the prime recipient may delegate approval of CPRs to subrecipients.

#### 3. Resolve Concerns or Deficiencies Identified During CPR Reviews

- a. **TPO** will monitor CPRs once approved and may conduct site visits, interviews, or other activities if errors, inconsistencies, omissions, or deficiencies are identified in the CPR. Recipients, contractors, and subcontractors are expected to comply with all DOE-directed compliance activities.



\* Crew-based Sub-Grantees will approve and accept their own payroll

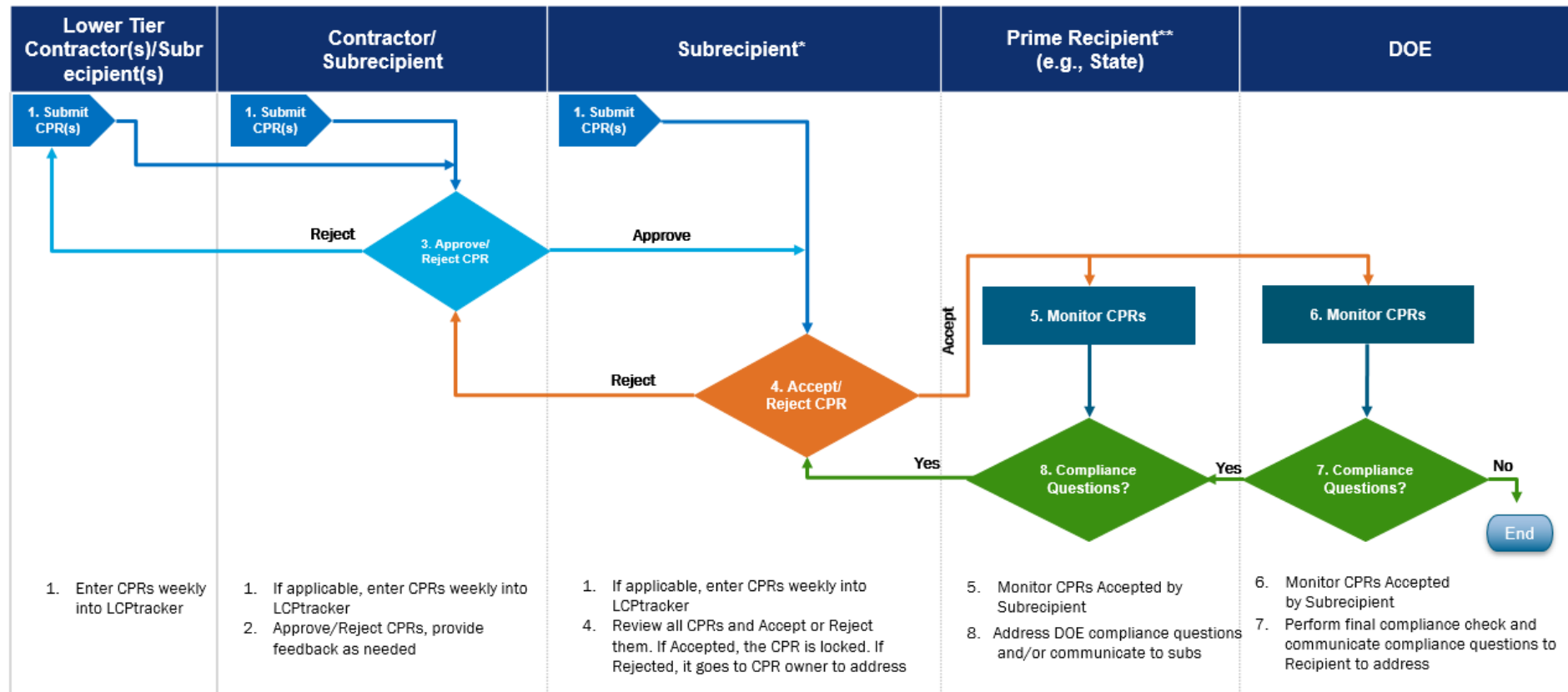
\*\*Territories and Tribes providing direct services will be responsible for the Grantee and Sub-Grantee entering, reviews, and acceptance of CPRs

\*\*\*As needed, DOE may request on-site visits to interview workers

**Figure 2: LCPtracker Process Flow: CPR Submission to Compliance Review (Prime Recipient Example)**



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\* In this case, the Prime Recipient has delegated accept/reject of the CPR to a Subrecipient

\* Crew-based Sub-Grantees will approve and accept their own payroll

\*\*Territories and Tribes providing direct services will be responsible for the Grantee and Sub-Grantee entering, reviews, and acceptance of CPRs

\*\*\*As needed, DOE may request on-site visits to interview workers

**Figure 3: LCPtracker Process Flow: CPR Submission to Compliance Review (Pass Through Example)**





## IV. Site Visits and Semi-Annual Reporting

In addition to weekly CPR submissions and reviews, site visits and Semi-Annual Reporting are DBA compliance activities conducted during construction.

### 1. Semi-Annual Reporting

- a. **Prime Recipients, Subrecipients, and Contractors** are required to submit the *Semi-Annual DBA Enforcement Report* found at [www.energy.gov/infrastructure/davis-bacon-act](http://www.energy.gov/infrastructure/davis-bacon-act) on April 21 and October 21 of each year.
  - i. Most recipients will submit the report to [DBAenforcementreports@hq.doe.gov](mailto:DBAenforcementreports@hq.doe.gov) and the reporting location indicated on the Federal Assistance Reporting Checklist included with the award documents.
  - ii. Select recipients who already have access to iBenefits will submit the report through the iBenefits system (<https://doeibenefits2.energy.gov>).
  - iii. Some recipients may have other submittal requirements, such as PAGE. Check with your TPO to determine how this must be submitted.

### 2. Site Visits

Recipients, contractors, and subcontractors are expected to comply with all DOE-directed site visit activities.

- a. **TPO** may determine that a DBA site visit is warranted based on compliance concerns outlined in [Resolve Concerns or Deficiencies Identified During CPR Reviews](#).
- b. **TPO** may elect to include a DBA site visit as part of a programmatic site visit.
- c. **TPO** may interview workers concerning their wages, hours, benefits, classifications, payroll deductions, and other related subjects.
- d. For more information, see the DBA Site Visit section of the [DOE DBA Desk Guide](#).

## V. Closeout and Record Disposition

*Instructions forthcoming*

## VI. Resources

### Websites:

- [Administrator Overview training video: LCPtracker](#)
- [Admin Intake Form](#)
- [Administrator User Manual: LCPtracker](#)
- [Application of General Wage Determinations to Davis-Bacon and Related Act Projects](#)
- [BIL Reporting Office Hours](#)
- [Contractor Intake Form](#)
- [Contractor Quick-Start Guide: LCPtracker](#)



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- [Contractor User Manual: LCPtracker](#)
- [DOE DBA Desk Guide](#)
- [DOE BIL DBA Website](#)
- [Federal Assistance Reporting Checklist \(FARC\)](#)
- [iBenefits](#)
- [Knowledge Center: LCPtracker](#)
- [LCPtracker Pro Module](#)
- [LCPtracker Project Information Form](#)
- [Metrics and Data Map](#)
- [OnSite: LCPtracker Module](#)
- [Prime Approver Guide: LCPtracker](#)
- [Project Information Form](#)
- [SAM.gov](#)
- [Standard Form \(SF\) 424, \*Application for Federal Assistance\*](#)
- [Standard Form \(SF\) 1445, \*Labor Standards Interview\*](#)
- [Wage Entry Request Form](#)
- [WH-347](#)

### Emails:

- [DBAenforcementreports@hq.doe.gov](mailto:DBAenforcementreports@hq.doe.gov)
- [DOES3S4DavisBaconLaborStandards@hq.doe.gov](mailto:DOES3S4DavisBaconLaborStandards@hq.doe.gov)
- [support@lcptracker.com](mailto:support@lcptracker.com)
- [training-DOE-BIL-DBLS@lcptracker.com](mailto:training-DOE-BIL-DBLS@lcptracker.com)



## Appendix A: LCPtracker Modules

### **LCPtracker Pro—Labor Compliance Monitoring and Workforce Reporting**

LCPtracker Pro is the foundational module of the Davis Bacon Act (DBA) electronic certified payroll reporting system. LCPtracker Pro is a paperless online system for entering certified payroll reports (CPRs) that helps manage prevailing wage programs, applicable labor laws, and workforce reporting requirements. The software will assist DOE in maintaining compliance with the DBA's state, county, or local prevailing or living wage rates; Federal Highway Administration (FHWA), U.S. Department of Housing and Urban Development (HUD), Equal Employment Opportunity (EEO), local hire tracking, and other applicable regulations and goals; and non-prevailing wage workforce requirements.

### **Daily Reporter—Compliance Reporting From the Field**

LCPtracker's Daily Reporter is a fully integrated module to LCPtracker Pro that streamlines the submission of daily reports directly from the construction site. It not only saves time from having to manually fill out dailies but also cross-checks data collected in the field with hours and crafts reported on the CPRs. It also allows for the logging of equipment, deliveries, and safety meetings and automatically auto-populates the weather for each report.

### **OnSite—Employee Interview Module**

LCPtracker's OnSite module is an iOS and Android tablet-based application that allows users to create, conduct, verify, and store custom site interviews electronically. OnSite allows users to utilize an electronic form, such as [Standard Form \(SF\) 1445, Labor Standards Interview](#), to perform contractor interviews and then populate that data in LCPtracker Pro. OnSite integrates with LCPtracker Pro to automatically cross-check field interview results with the information that Contractors submit on their CPRs. This cross-check will then "fail" an interview if discrepancies are identified.



## Appendix B: LCPtracker Training

### Required Live Training for Recipients and Contractors

Required live training for LCPtracker users with the LCPtracker roles of Administrator, Prime Approver, and Contractor is as follows:

	Administrator (1 hour each)	Prime Approver (Prime Contractor) (1.5 hours)	Contractor (Prime & Lower Tier) (1 hour each)
<b>LCPtracker Pro Live</b> <ul style="list-style-type: none"> <li>Payroll Entry</li> <li>1<sup>st</sup> &amp; 3<sup>rd</sup> Wed of the month at 1 pm ET</li> </ul>		X	X
<b>LCPtracker Pro Live</b> <ul style="list-style-type: none"> <li>Overview</li> <li>1<sup>st</sup> &amp; 3<sup>rd</sup> Tue of the month at 1 pm ET</li> </ul>	X		
<b>LCPtracker Pro Live</b> <ul style="list-style-type: none"> <li>Settings</li> <li>Thur after 1<sup>st</sup> &amp; 3<sup>rd</sup> Tue at 1 pm ET</li> </ul>	X		
<b>LCPtracker Pro Live</b> <ul style="list-style-type: none"> <li>Setup, eDocs, Reports</li> <li>2<sup>nd</sup> &amp; 4<sup>th</sup> Tue of the month at 1 pm ET</li> </ul>	X		
<b>LCPtracker Pro Live</b> <ul style="list-style-type: none"> <li>Hands-On User Setup</li> <li>Thur after 2<sup>nd</sup> &amp; 4<sup>th</sup> Tue at 1 pm ET</li> </ul>	X		
<b>Daily Reporter</b> <ul style="list-style-type: none"> <li>Daily Logs</li> <li>2<sup>nd</sup> &amp; 4<sup>th</sup> Wed of the month</li> </ul>	X		X
<b>As-Needed LCPtracker Pro Live Training Sessions</b>			X



## **LCPtracker Live Training Schedule**

To attend a live session, please register no later than the day before via the [DOE BIL DBA website](#) or by emailing [training-DOE-BIL-DBLS@lcptracker.com](mailto:training-DOE-BIL-DBLS@lcptracker.com). All courses will take place at 1 pm EST.

## **LCPtracker Available On-Demand Training**

LCPtracker also offers [on-demand webinars and other training materials](#) by role:

### ***Administrators***

#### **Admin Overview Training**

- This class offers a condensed look into the Administrator role in LCPtracker. We'll go over project set-up, contractor set-up, department/validation settings, eDocument set-up and review, violations, and CPR review.

#### **Admin Overview Training with Subtitles**

#### **Admin Wage Data Training**

- This class reviews prevailing wage set-up on the Administrator side of LCPtracker.

#### **Admin Reports Training**

- This class reviews reports on the Administrator side of LCPtracker, including All Notices report, Apprentice reports, Contractor Assignment report, CPR Summary report, Data Extracts, Late CPR report, Payroll Details, and various other reports.

#### **Administrator Training Documentation**

- Here you can find relevant support documents for administrators including guides, manuals, and catalogs.

### ***Prime Approvers***

#### **Prime Approver Training**

- This class offers a condensed look into the Prime Approver Administrator role in LCPtracker. We'll go over CPR review, eDocument review, violations, and contractor set-up.

### ***Contractors***

#### **Contractor Training**

- This class covers the Contractor side of LCPtracker. This includes employee set-up, creating payroll records, clearing notices, certifying CPRs, and various other topics in the system.

#### **Contractor Training with Subtitles**

#### **Daily Reporter Training**



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- This class reviews the Daily Reporter module from the Contractor side of the application. This includes creating, editing, and reviewing “paper copies” of submitted daily logs.

### [LCPtracker Pro Training Documentation](#)

- Here you can find relevant support documents for contractors including guides, manuals, and catalogs.



## Appendix C: Acronyms

Acronym	Definition
ALRD	Administrative and Legal Requirements Document
BIL	Bipartisan Infrastructure Law
CBA	Collective Bargaining Agreement
CO	Contracting Officer
CPR	Certified Payroll Report
DBA	Davis Bacon Act
DOL	Department of Labor
EEO	Equal Employment Opportunity
FARC	Federal Assistance Reporting Checklist
FARM	Financial Assistance Reporting Map
FECM	Office of Fossil Energy and Carbon Management
FHWA	Federal Highway Administration
FOA)	Funding Opportunity Announcement
GDO	Grid Deployment Office
GO	Grants Officer
HUD	U.S. Department of Housing and Urban Development
IRA	Inflation Reduction Act
OCED	Office of Clean Energy Demonstrations
OGC	Office of the General Counsel
SCEP	Office of State and Community Energy Programs
SF	Standard Form
TPO	Technical Project Officer
WAP	Weatherization Assistance Program
WD	Wage Determination



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