

EXHIBIT 4-P

INSTRUCTIONS FOR CONDUCTING EMPLOYEE INTERVIEWS

- A. As a courtesy, the grantee should notify the foreman or construction supervisor in advance of the time of the employee interviews.
- B. The person performing interviews should be knowledgeable about labor standards procedures.
- C. Labor standards should be enforced to the same extent as all other contract requirements.
- D. Failure of contractors to comply with labor standards may require payroll adjustments that could result in the imposition of sanctions.
- E. The number of employees interviewed should be:
 - 1. Sufficient in number to establish the degree of accuracy of the records (10% or more of the work force).
 - 2. Representative of all classifications of employees on the project (at least one person in each job classification).
- F. The place of the interview could be:
 - 1. The job site, if the interview can be conducted properly and privately (this must be a one-on-one process);
 - 2. The employee's home;
 - 3. The agency's office; or
 - 4. By mail.
- G. The interviewer should observe the duties of the workers on the job site before initiating any interviews.
- H. To initiate the interview, the interviewer should:
 - 1. Extend a proper personal introduction.
 - 2. Clearly state the purpose of interview.
 - 3. Advise the worker that the information given is confidential, and that his or her identity will not be disclosed to the employer without the employee's written permission.

- I. Employee interviews are recorded on the appropriate form (HUD-11). The interviewer should pay particular attention to:
 1. The employer's name (not just the name of a first line supervisor).
 2. The employee's full name.
 3. The employee's permanent mailing address.
 4. The last date the individual worked on the HOME project and the number of hours worked that day (the interviewer should make it clear that the questions relate solely to work on a particular HOME project, and not to other work performed for the company).
 5. The hourly rate of pay.
 - a. Determine if the worker is being paid at least the minimum required by the wage rate for the appropriate job classification.
 - b. Be sure the worker is not quoting the "net" hourly rate.
 - c. If it appears the individual may be underpaid, closely question the worker, ask for any records, and arrange to re-interview the employer.
 6. The worker's statement regarding his or her job classification, (but not a nickname for the trade).
 7. The duties and tools used by this person on the HOME project. If the worker's statements and the observation made by the interviewer indicate that this individual is performing under the correct job classification, the word "trade" may be entered across both items.
 8. Any comments that seem necessary or pertinent.
 9. The exact date the interview took place.
- J. The payroll examiner will then check the information on the Employee Interview Form HUD-11 against the payroll report form submitted for the same date as the interview:
 1. If no discrepancies appear, "*None*" should be written in the "comments" space.
 2. If discrepancies do appear, appropriate action should be initiated.
 3. When the necessary action has been completed, the results must be noted on the same interview form.
- K. The interviewer and payroll examiner will identify and correct any discrepancies between on-site interviews, payroll reports and wage rate determinations.