

Minneapolis
City of Lakes

CIVIL RIGHTS DEPARTMENT

CONTRACT COMPLIANCE UNIT

QUARTERLY CONTRACT COMPLIANCE REPORT
October – December 2010

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INTRODUCTION

The Minneapolis Civil Rights (Department) Contract Compliance Unit supports and promotes the City objectives to develop and maintain stable neighborhoods and *One Minneapolis* through equal opportunity and affirmative action activities. The Contract Compliance Unit (CCU) assists, monitors, investigates and reports on contracting and employment participation on city assisted contracts. The CCU monitors contract compliance throughout the performance of a contract to ensure nondiscrimination, affirmative action in employment, and prevailing wage and Davis-Bacon requirements are adhered to.

Each prime contractor or subcontractor that receives \$50,000 or more from a City of Minneapolis financed or assisted contract or project is required to develop and submit an affirmative action plan. The plan formally documents the business' adherence to nondiscriminatory practices and its method to recruit and maintain a workforce that mirrors the availability of protected class persons in the marketplace. Such plans are good for a two-year period after review and approval by the Department.

2010 – 4th QUARTER ANALYSIS

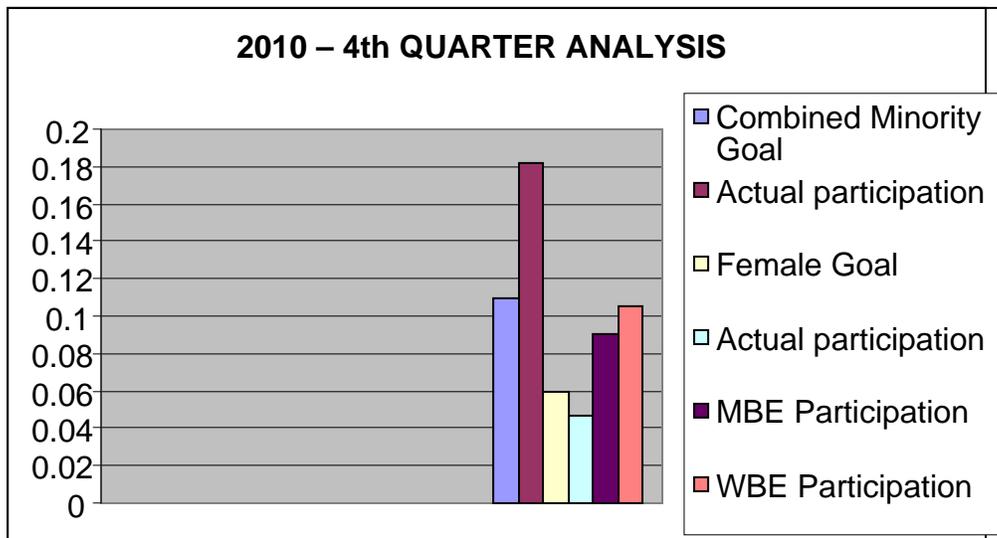
Summaries for the 4th Quarter 2010 are as follows:

61 active construction projects with a value of \$212,136,108 (Table 1)

- Combined Minority Goal = **11%**, Actual Participation = **17.7%**
- Female Goal = **6%**, Actual Participation = **4.65%**

Small and Underutilized Business Participation for Active Projects (Table 5)

- MBE Participation totaled \$16,321,794, or 8.5%
- WBE Participation totaled \$21,166,905, or 11%



IMPROVED COORDINATION WITH DEPARTMENTS & PARTNERS

- In the 4th quarter of 2010 CCU staff met with several departments to review the disparity study and seek comments about new directions.
- The CCU has communicated with the National Association of Minority Contractors (NAMC) and other community organizations. CCU staff have attended NAMC monthly meetings and have met with them to discuss bidding City of Minneapolis projects.
- The CCU has also had several meetings with labor unions and associations to certify individuals as Section 3 eligible and to get a clear understanding of union membership issues. CCU staff has worked directly with the unions on prevailing wage issues and we have attending their “prevailing wage” committee meeting to discuss compliance.
- The CCU has worked directly with developers and general contractors on implementing Affirmative Action Plans on City of Minneapolis projects.
- The Assistant Director is the representative for the City of Minneapolis on the Central Corridor Light Rail Transit (CCLRT) project review committee. This committee reviews contractors’ bids for compliance with federal and state laws regarding Affirmative Action, employment and Disadvantaged Business Enterprise participation on the Central Corridor project.

SMALL AND UNDERUTILIZED BUSINESS ACTIVITY (SUBP)

- In accordance with sections 139.70 and chapter 423.70 of the Minneapolis Code of Ordinances, the Department worked with city departments to set minimal participation goals in selected areas. In this quarter we reviewed goals for 49 projects: 10 construction projects, 38 goods and services contracts, and 1 request for proposals.
- The department continues to review projects for goals within the 10-day timeframe established.
- SUBP goals are set based on the availability of women and minorities in the seven county metro areas.

DISPARITY STUDY

The National Economic Research Associates, (NERA) submitted the disparity to the City of Minneapolis in October 2010. The disparity study showed that despite the city’s efforts to level the playing field for small minority and woman owned businesses, that disparity still exists. The study had several recommendations on how to start the process for correcting the disparity. The Director and Assistant

Director – Contract Compliance met with department heads to explain the disparity study and its recommendations and also started the process of re-writing the city ordinance and adopting many of the changes suggested by the study. The re-write of the ordinance along with creating new rules, procedures and processes will continue into the 1st quarter of 2011.

SECTION 3 PROGRAM

MDCR currently has 46 businesses certified as Section 3 eligible, with 6 pending certification. The CCU has attended the NAMC meetings and has informed its members of the Section 3 program and requirements. In addition, staff has developed a Section 3 Resident Certification listing to distribute to contractors seeking new employees. The Department has partnered with Urban Ventures Leadership Foundation and the various unions who have 1,000's of their members out of work. To date, we have certified 62 City of Minneapolis unemployed persons as Section 3 residents waiting to work on our projects.

To be Section 3 eligible resident eligible one must live in the City of Minneapolis and their family income must fall within the 80% median income guidelines. The 80% median income guidelines change annually and certifications are valid for one year periods.

NEIGHBORHOOD STABILIZATION PROGRAM

The CCU continues to track and monitor the NSP program. Cumulatively, these employment goals are being achieved and exceeded through December 2010. The SUBP and Section 3 contracting goals are 6% MBE, 8% WBE and 10% Section 3.

- Minority skilled participation **49.24%**
- Minority unskilled participation **83.70%**
- Female participation **22.01%**
- Although we monitor each project separately and the contractors go through our good faith effort process, these goals will ultimately be reported cumulatively.
- 53 homes have been approved for construction (\$5,321,470)
- \$1,654,376 or **31.09%** MBE
- \$543,284 or **10.21%** WBE
- \$1,549,887 or **29.13%** Section 3

All SUBP/Section 3 contracting goals for this 4th quarter are being met and exceeded. This success is a collaborative effort between City staff and the contracting community.

CONCLUSION

The CCU continues to work diligently to monitor and enforce all City of Minneapolis ordinances and all federal and state regulations for which it has responsibility. We continue to work with other City departments and community partners to ensure they understand the Civil Rights mandates and requirements.

The work of the CCU has put contractors and the City of Minneapolis in a better position to be in compliance with local and federal requirements. Our more thorough and transparent reporting requirements and procedures have enabled us to provide a message to the community that the City of Minneapolis is a leader in non-discrimination, prevailing wages and small business participation. This thoroughness has been manifested in higher participation by woman and minority owned businesses and female and minority employment on City of Minneapolis projects. We will continue to focus our efforts on bringing all contractors into compliance and making opportunities available for minorities and women in the City of Minneapolis.

TABLE 1
Active Projects (4th Quarter 2010)

Project Name	Project Location	General Contractor	Contract Amount	Minority Percentage (Combined)	Female Percentage
2nd Avenue Tunnel Repair OP 7345	2 nd Ave. (5 th to 7 th Street)	Engineering & Construction Innovation	\$635,445	25.6	14.3
7th Street & Van White Blvd OP 7286	7 th Street & Van White Boulevard	Thomas & Sons Construction	\$912,489	12.6	6.4
10th Avenue Storm Tunnel OP 7362	Mississippi River near 10 th Avenue	Engineering & Construction Innovation	\$1,165,835	0	0
10th Avenue Tunnel Dewater OP 7357	11 th & 12 th Avenues S.E.	Keys Well Drilling	\$177,750	0	0
3631 Penn Avenue North	3631 Penn Avenue North	Watson-Forsberg	\$316,275	54.1	0
ADC HVAC Upgrades OP 7195	350 South 5th Street	Northern Air Corporation	\$479,700	14.9	5.8
Alliance Addition	722-730 17 th Avenue East	Weis Builders	\$4,566,927	18.4	4.3
Audubon Crossing	951 Lowery Avenue S	Benson-Orth	\$4,283,224	12.1	4.1
Avenues for Homeless Youth	1708 Oak Park Ave N.	Load Bearing	\$121,433	0	0
Chicago Avenue Fire Arts Center	3749 Chicago Ave South	J. Carlson & Sons	\$282,954	14.6	3.4
Clare Midtown	3105 – 23 rd Ave South	Frerichs Construction	\$5,727,326	14.6	4.5
Convention Center Acoustics OP 7356	Mpls Convention Center	Twin City Acoustics	\$306,115	8.7	10.2
Convention Center Demo OP 7356	Mpls Convention Center	Century Construction	\$197,000	12.0	6.3
Convention Center Drywall OP 7356	Mpls Convention Center	Berg Drywall	\$888,000	7.4	0
Convention Center Electric OP 7356	Mpls Convention Center	Egan Company	\$292,329	19.2	10.8
Convention Center Landscape OP 7343	Mpls Convention Center	Cedar Ridge Landscaping	\$440,000	0	0
Convention Center Mechanical OP 7364	Mpls Convention Center	Egan Company	\$217,348	73.2	13.9
Convention Center Low Roof Re-Roof OP 7186	1301 – 2 nd Avenue South	Central Roofing	\$3,002,426	41.8	3.8
Creekside Commons	115 – 54 th Street East	Weis Builders	\$5,006,760	17.3	3.1
Currie & Stewart Park OP 7335	2700 12 th Ave. South	Cobalt Contracting	\$501,356	10.2	.8
Delisi (5 Points) Building	2119 West Broadway	Norman Construction	\$2,033,897	41.1	9
Demo of Building at 3001-3011 OP 7332	3001-3011 Lake Street	Buberl Recycling	\$59,435	0	0
Demo of (3) Structures OP 7290	Various locations	Carl Bolander & Sons	\$62,600	0	0
Demo of (6) Structures OP 7266	Various locations	K.A. Kamish	\$96,780	37.2	23.9

Project Name	Project Location	General Contractor	Contract Amount	Minority Percentage (Combined)	Female Percentage
		Excavation			
Demo of (7) Structures OP 7302	Various locations	Buberl Recycling	\$84,069	0	0
Demo of (7) Structures OP 7312	Various locations	A.M.E. North, Inc.	\$89,700	0	0
Demo of (9) Structures OP 7317	Various locations	Moen Concrete	\$167,600	41.7	0
Demo of (12) Structures OP 7300	Various locations	K.A. Kamish Excavation	\$197,413	39.4	16.6
Dewatering Plant OP 7171	4300 Marshall St. NE	Graham Construction	\$19,220,000	19.5	3.4
East Phillips Community Cultural Center OP 7202	2307 - 17 th Avenue South	Rochon Corporation	\$2,693,000	21.4	3.9
East River Road Erosion – OP 7276	7276 East River Road	Veit & Company	\$215,529	14.4	6.3
Emergency Operations Facility	37 th & Main Street NE	Ebert Construction	\$4,197,692	13.10	1.0
Exodus Apartments	3100 Block of 1 st Ave S.	Flannery Construction	\$444,256	24.7	13.6
Gateway Lofts	2601 West Broadway Avenue	Frerichs Construction	\$5,369,693	0	0
Grease Interceptor OP 7174	Mpls Convention Center	Lund Martin Construction	\$158,000	6.2	2.7
Hiawatha Wade Pool OP 7327	2701 East 44 th Street	Global Specialty Cont	\$218,900	29	0
Hiawatha Maintenance Facility – OP 7057	E. 26 th Street & Hiawatha Avenue	Knutson Construction	\$11,074,477	11	3.9
Hydraulic Surge Facility OP 7279	At Pump Station #4	Rice Lake Construction	\$676,600	7.9	7.7
Lyndale Green	610 28th Street West	Frana & Sons	\$7,274,758	1.6	0
Mechanical & Life Safety OP 7223	City Hall	Cool Air Mechanical	\$1,549,000	9.2	6.2
Minnehaha Falls Vegetation OP 7361	Minnehaha Creek Area	Prairie Restorations	\$296,095	14	8.3
MoZiac	1320 Lagoon Avenue S.	Ryan Construction	\$19,500,000	0	0
Near North Community Housing	Various locations	Flannery Construction	\$4,628,428	23.6	6.8
Nicollet Square Apartments	3700 Nicollet Ave S	Frerichs Construction	\$5,327,496	31.4	3.0
Nokomis Senior Housing	3717 – 23 rd Avenue S	Frana & Sons	\$9,855,000	6.8	2.8
Parking Lot Pavement OP 7253	Various Locations	Midwest Asphalt Corp	\$217,400	5.4	8
Pioneer & Soldiers Memorial Cemetery Fence OP 7307	2945 Cedar Avenue South	Terra General Contractors	\$237,000	16.5	6.3
Pump Station #4	37th Ave NE, Fridley	Madsen-Johnson	\$7,655,709	16.6	5
Ramp B (rebid) OP 7173	516 – 2 nd Avenue North	Lund Martin Construction	\$6,865,000	12.1	6.0
Re-Roof Fire Station #20 OP 7298	4646 Humboldt Ave N.	Cool Air Mechanical	\$288,320	13	3.8
Riverside Plaza Stabilization	1525 S. 4th Street	Knutson Construction	\$48,357,013	0	0
South Transfer Facility OP 7323	2850 20 th Avenue South	Lund Martin Construction	\$342,400	19.9	4
St. Stephan's Shelter	2201 Clinton Avenue S.	Architect Mechanical	\$60,700	0	0
Storm Sewer Separation OP 7314	33 N. 9 th Street	NAC Mechanical	\$261,800	24	0
Target Center Surveillance OP 7373	600 1 st Avenue	Audio & Security	\$85,153	0	0

Project Name	Project Location	General Contractor	Contract Amount	Minority Percentage (Combined)	Female Percentage
		Engineers			
Telecommunications Installation & Removal Service	1301 2nd Avenue South	ColliSys	\$80,000	0	2.6
TC Habitat – Met Council	416 & 430 – 30 th Ave N	TC Habitat for Humanity	\$74,587	13.6	6.8
Trailway Crack Filling OP 7303	Various locations	Gopher State Sealcoat	\$127,126	0	0
The Shubert Performing Arts Cent.	516 Hennepin Avenue	McGough Construction	\$20,077,934	16.2	5.4
Wall Fabric Replacement	Convention Center	Painting by Nakasone	\$103,442	9.7	32.6
Whittier Cooperative Apartments	2609 Blaisdell Avenue	Frerichs Construction	\$2,191,414	7.3	7.7
TOTALS			\$212,136,108	17.7%	4.65%

TABLE 2**Closed Projects (4th Quarter 2010)**

Project Name	General Contractor	Contract Amount	Minority Percentage (Combined)	Female Percentage
Alliance Scattered Housing	Flannery Construction	\$1,097,238	25.2	6.49
Buri Manor	Frerichs Construction	\$156,900	19.3	6.9
Chicago Avenue Pavement OP 7261	Veit Construction	\$688,286	17.9	6.7
Construction of Sidewalks OP 7269	Standard Sidewalk	\$1,917,600	22.8	6.5
Creekside Watermain	Weis Builders	\$149,974	0	0
Fremont Flats	Frerichs Construction	\$360,330	14.7	3
Hope Stabilization	Frerichs Construction	\$1,031,000	23	6.7
Many Rivers	Engelsma Construction	\$199,103	31.6	27
Phillips Community Center OP 7242	Terra General Contractors	\$893,500	14.9	2.2
Plank Road – OP 7308	L.S. Black Constructors	\$189,600	7.14	15.8
Ramp A & C OP 7196	Lund Martin	\$1,217,958	19.56	10.2
Riverbank Stabilization OP 7153	Rachel Contracting	\$317,803	20.9	10.9
Single Family Dwelling OP 7212	Ram Construction	\$124,597	90	13
Tennis Court – OP 7294	Recreational Surfaces	\$64,276	0	0
Wirth Beach Phase II OP 7191	Fitol-Hintz Construction	\$761,989	12.6	6.9
TOTALS		\$9,170,154	22.28%	7.68%

TABLE 3

SUBP Results for Active Projects (4th Quarter 2010)

General Contractor Name	Project Name	Contract Amount	MBE Goal %	MBE Actual %	MBE Actual \$	WBE Goal %	WBE Actual %	WBE Actual \$
Engineering & Construction Innovation	2nd Avenue Tunnel Repair OP 7345	\$635,445	5	.004	\$2,500	8	3.8	\$24,150
Thomas & Sons	7th Street & Van White Blvd 7286	\$912,489	6	6.4	\$58,547	7	7.1	\$64,883
Engineering & Construction Innovation	10th Avenue Storm Tunnel OP 7362	\$1,165,835	5	3.3	\$38,200	8	7.2	\$84,090
Watson-Forsberg	3631 Penn Avenue North	\$316,275	6	10	\$31,680	8	9	\$31,840
Northern Air Corporation	ADC HVAC Upgrades 7195	\$479,700	4	4.6	\$22,211	5	10.68	\$25,250
Weis Builders	Alliance Addition	\$4,566,927	7	15	\$559,832	9	13.9	\$612,254
Benson-Orth	Audubon Crossing	\$4,283,224	4	4.66	\$199,873	4	8.84	\$378,631
Load Bearing, Inc.	Avenues for Homeless Youth	\$121,433	4	88.5	\$107,473	5	0	\$0
J. Carlson & Sons	Chicago Fire Arts Center	\$282,954	5	15	\$42,349	5	14	\$39,480
Frerichs Construction	Clare Midtown	\$5,727,326	8	9.8	\$562,983	7	7.8	\$445,687
Twin City Acoustics	Convention Center Acoustics OP 7356	\$306,115	0	0	\$0	2	2.1	\$6,500
Century Construction	Convention Center Demo OP 7356	\$197,000	7	10	\$20,000	5	4.6	\$9,850
Berg Drywall	Convention Center Drywall OP 7356	\$888,000	3	0	0	3	2.82	\$25,000
Egan Company	Convention Center Electric OP 7356	\$292,329	6	6.3	\$18,267	6	6	\$17,500
Cedar Ridge Landscaping	Convention Center Landscape OP 7343	\$440,000	7	7	\$30,800	5	5	\$22,000
Egan Company	Convention Center Mechanical OP 7364	\$217,348	4	14.8	\$32,205	5	8.78	\$19,100
Central Roofing	Convention Center Re-Roof 7186	\$3,002,426	7	7	\$210,800	8	8	\$240,500
Weis Builders	Creekside Commons	\$5,006,760	8	7.26	\$456,824	7	10.74	\$363,689
Cobalt Contracting	Currie & Stewart Park OP 7335	\$501,356	6	6.67	\$18,000	7	8.11	\$21,934
Moen Concrete	Demo of (9) Structures OP 7317	\$167,600	8	24.11	\$40,425	6	14.40	\$23,300
K.A. Kamish Excavation	Demo of (12) Structures OP 7300	\$197,413	2	17.2	\$33,950	2	22.3	\$43,900

General Contractor Name	Project Name	Contract Amount	MBE Goal %	MBE Actual %	MBE Actual \$	WBE Goal %	WBE Actual %	WBE Actual \$
Norman Construction	Delisi (5 Points) Building	\$2,033,897	6	29.4	\$510,922	7	18.9	\$341,906
Rochon Corporation	East Phillips Community Center 7202	\$2,693,000	6	6.2	\$165,681	7	9.2	\$248,189
Veit & Company	East River Road Erosion OP 7276	\$215,529	4	.68	\$1,699	3	3.25	\$6,999
Ebert Construction	Emergency Operations Facility	\$4,197,692	8	7.8	\$367,300	9	5.96	\$751,429
Flannery Construction	Exodus Apartments	\$444,256	7	11.5	\$51,094	6	15.5	\$68,694
Frerichs Construction	Gateway Lofts	\$5,369,693	6	6.4	\$341,262	6	6	\$252,189
Lund Martin Construction	Grease Interceptor	\$158,000	3	5.4	\$8,403	4	25	\$39,495
Global Specialty Cont	Hiawatha Wade Pool OP 7327	\$218,900	4	2.7	\$8,756	6	5.5	\$13,134
Knutson Construction	Hiawatha Maintenance Facility OP 7057	\$11,074,477	8	2.45	\$271,117	8	7.1	\$787,863
Rice Lake Construction	Hydraulic Surge Facility OP 7279	\$676,600	4	22.8	\$153,928	3	5.9	\$40,002
Frana & Sons	Lyndale Green	\$7,274,758	9	8.1	\$587,975	9	5.7	\$415,403
Cool Air Mechanical	Mechanical & Life Safety Upgrds 7223	\$1,549,000	3	3.9	\$60,000	4	8.2	\$126,300
Prairie Restorations	Minnehaha Falls Vegetation OP 7361	\$296,095	4	2.2	\$3,150	6	1.69	\$2,400
Ryan Construction	MoZiac	\$19,500,000	8	1.8	\$364,068	8	6.6	\$1,305,678
Flannery Construction	Near North Project	\$4,628,428	7	12.7	\$558,443	9	12.6	\$581,537
Frerichs Construction	Nicollet Square	\$5,327,496	8	6.5	\$344,390	8	8	\$425,235
Frana & Sons	Nokomis Senior	\$9,855,000	7	7.5	\$740,074	7	7	\$710,512
Midwest Asphalt Corp	Parking Lot Pavement OP 7253	\$217,400	3	1.4	\$3,000	3	1.20	\$2,600
Terra General Contractors	Pioneer & Soldiers Memorial OP 7307	\$237,400	2	2	\$5,000	2	2	\$52,250
Madsen-Johnson	Pump Station #4	\$7,655,709	5	7	\$556,000	5	18	\$1,383,171
Lund Martin Construction	Ramp A & C OP 7196	\$1,217,958	5	9.7	\$117,717	5	6.3	\$76,448
Lund Martin Construction	Ramp B (rebid) OP 7173	\$6,865,000	7	19.0	\$1,301,875	9	8.9	\$611,529
Cool Air Mechanical	Re-Roof Fire Station #20 OP 7298	\$288,320	7	3.8	\$11,024	8	2.2	\$6,380
Knutson Construction	Riverside Plaza	\$48,357,013	6	10.3	\$4,980,772	5	14.8	\$7,164,930
Lund Martin Const.	South Transfer Facility OP 7323	\$342,400	3	19.4	\$66,342	3	11.5	\$39,500
NAC Mechanical	Storm Sewer	\$261,800	3	11	\$30,000	6	44.11	\$73,939

General Contractor Name	Project Name	Contract Amount	MBE Goal %	MBE Actual %	MBE Actual \$	WBE Goal %	WBE Actual %	WBE Actual \$
	Separation OP 7314							
Gopher State Sealcoat	Trailway Crack Filling OP 7303	\$127,126	2	0	\$0	3	0	\$0
McGough Construction	The Shubert Performing Arts	\$20,077,934	10	10.5	\$2,045,158	11	12.8	\$2,578,225
TC Habitat for Humanity	TC Habitat – Met Council	\$74,587	6	0	0	8	19.4	\$14,467
Frerichs Construction	Whittier Apartment	\$2,191,414	6	8.2	\$179,725	8	25	\$546,963
Totals		\$193,134,837		8.5	\$16,321,794		11.0	\$21,166,905

TABLE 4

Projects Not Meeting Goals

Contractor	Project Name	Contract Amount	Project Status	Minority Percentage (Combined)	Female Percentage	Activity if participation was 2% below goal	# of 2% Incidents in Last 5 Years
Watson Forsberg	3631 Penn Ave.	\$316,275	Active	54.1	0	Just started –113 total hours	3
Central Roofing	Convention Center Re-roof 7186	\$3,002,426	Active	43.4	3.9	Contractor met goals of new corrective plan	0
Rochon Construction	East Phillips Community Center 7202	\$2,693,000	Active	19.6	0.1	Contractor has been placed in non-compliance – reviewing plan	0
J. Carlson & Sons	Chicago Fire Arts Center	\$282,984	Active	14.6	3.4	Exceeded goals of corrective plan	0
Terra General Contractors	Phillips Community Ctr. 7242	\$893,500	Active	14.9	2.2	Scope of contract changed	0
Weis Builders	Alliance Addition	\$4,566,927	Active	17.8	2.39	Corrective Action plan requested	1
Frana	Lyndale Green	\$7,274,758	Active	1.6	0	Project just started, only 2 contractors on site, 1 with no committed female or skilled participation	3
Ebert Construction	Emergency Operations Training Facility OP 7125	\$4,197,692	Active	13.10	1.0	A subcontractor was removed from the project – this sub had the majority of female hours to perform	2
Berg Drywall	MCC Drywall O.P. #7356	\$888,000	Active	7.4	0	Project just started – females haven't performed yet – assures will meet this goal	0
Frerichs Const	Nicollet Square	\$5,327,496	Active	31.4	3	A corrective plan has increased numbers, but a new review is being conducted	3
Midwest Asphalt	Parking Lot Pavement Replacement	\$217,400	Not Active until 5/11	5.3	8.01	Company said that it would meet the goals as female and minority workers would be involved in the completion of the project	0
Twin City Acoustics	Conv Cntr	\$306,115	Done	8.7	10.2	Explanation requested, under	0

Contractor	Project Name	Contract Amount	Project Status	Minority Percentage (Combined)	Female Percentage	Activity if participation was 2% below goal	# of 2% Incidents in Last 5 Years
	Acoustics 7356c					review	
Cool Air Mechanical	ReRoof Fire 20	\$288,320	Active	12.1	3.8	Layoffs, confirmed seniority as basis	1
Frerichs Const	Whittier Apartments	\$2,191,414	Active	7.3	7.7	Contract changes due to fire, but GC showed 11% skilled goal will still be met.	3
Rice Lake Construction	Hydraulic Surge Facility 7279	\$676,600	Active	7.9	7.7	Added a unskilled minority worker end of December	0
Frana	Nokomis Senior Housing	\$9,855,000	Active	6.8	2.8	Project out of compliance because of missing payroll. Next payment is on hold until resolved.	3