

**SUPPORTING STATEMENT FOR
REPORT OF CONSTRUCTION CONTRACTOR'S WAGE RATES**

OMB CONTROL NO. 1235-0015

The U.S. Department of Labor (Department) submits this information collection request (ICR) as an extension without change of a currently approved collection

Part A: JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Davis-Bacon Act (DBA), as enacted in 1931 and subsequently amended, requires the payment of minimum prevailing wages determined by the Department of Labor to laborers and mechanics working on federal contracts in excess of \$2,000 for the construction, alteration, or repair, including painting and decorating, of public buildings and public works. *See* 40 U.S.C. 3141 *et seq.* Congress has also included the Davis-Bacon requirements in numerous other laws, known as the Davis-Bacon Related Acts (the Related Acts and, collectively with the Davis-Bacon Act, the DBRA), which provide federal assistance for construction projects through grants, loans, loan guarantees, insurance, and other methods.

The DBA delegates to the Secretary of Labor the responsibility to determine the wage rates that are "prevailing" for each classification of covered laborers and mechanics on similar projects "in the civil subdivision of the State in which the work is to be performed." 40 U.S.C. 3142(b). The Administrator of the Wage and Hour Division (WHD), through this delegation of authority by the Secretary of Labor, is responsible for issuing these wage determinations (WDs). The DBRA implementing regulations provide that the Administrator will conduct a continuing program for obtaining and compiling wage rate information for issuing WDs. *See* 29 CFR 1.3. As a part of this program, the regulation provides that the Administrator will encourage the voluntary submission of wage rate data by contractors, contractors' associations, labor organizations, public officials, and other interested parties, reflecting wage rates paid to laborers and mechanics on various types of construction in the area. *See* 29 CFR 1.3(a). The information submitted should reflect not only the wage rates paid a particular classification in an area, but also the type or types of construction on which such rate or rates are paid, and whether such rates were for federal or federally assisted projects subject to DBA prevailing wage requirements.

To carry out the program required by the DBA and 29 CFR 1.3, the Administrator uses the collection instrument called the Form WD-10 to solicit information that is used to determine locally prevailing wages under the DBRA. The wage-data collection using the WD-10 is a primary source of information and is essential to the determination of prevailing wages.

Report of Construction Contractor's Wage Rates

OMB Control Number: 1235-0015

OMB Expiration Date: 04/30/2026

In October 2009, the National Defense Authorization Act (NDAA) of 2010 (Guam Realignment Fund) placed a requirement on WHD to establish wage rates for Guam under the provisions of the DBA. The NDAA also requires that WHD establish such wage rates each year until 90 percent of the funds for the Guam realignment project are spent. In addition, the NDAA stipulates that WHD cannot use the rates and employees working in Guam under the Immigration and Nationality Act (INA) H-2B program when calculating the DBA rates. The NDAA required that WHD amend instructions for completion of the form WD-10.

WHD also uses the form WD-10A, which is available and can be used by contractors and other interested parties to submit additional prime contractor and subcontractor information to help ensure that contractors and other interested parties are broadly invited to participate in the survey.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Form WD-10 is an optional form respondents may use to ensure consistency in submission of wage data. Respondents may use an alternate format to submit data, provided it includes the information requested on the form WD-10. WHD uses the wage data submitted voluntarily by respondents to determine locally prevailing wages that are the required minimum wages for contracts that are subject to DBRA. This wage data collection is a primary source of information and is essential to the process of issuing wage determinations. Those wage determinations are then published in SAM.gov, and contracting agencies incorporate them into certain federally funded contracts.

WHD will continue to send letters announcing a DBRA wage survey to interested parties such as Congressional representatives, contractor trade associations, contractors, and unions at both the local and headquarters levels to advise them of the survey and solicit their cooperation in furnishing payment data. In addition, WHD will also notify federal, state, and local agencies. The notice will inform them of the type of construction, the area surveyed, the survey period, and the cut-off date for data submission. The letter encourages interested parties to respond to the information request.

WHD also uses a form to send pre-survey information requests (the WD-10A) to general or prime contractors and certain subcontractors identified as working on construction projects within the survey period to better identify additional contractors that performed construction work in the surveyed area. This allows WHD to have all possible contacts prior to the survey starting. This aims to eliminate the practice of WHD receiving new contact information *during* the survey and having to send new survey notifications to parties during the survey, potentially shortening the timeframe of the survey and allowing for more timely determination and publication of prevailing wage rates. It also helps as the survey data collection is being reduced for quicker publication of survey results.

The WD-10A requests that general contractors and subcontractors supply a list of their subcontractors to whom WHD may send notification of the survey. Similar information was previously requested as part of the wage survey form (WD-10) during as part of the survey itself. However, through WHD's revised WD-10 and WD-10A, this information is solicited prior to the

beginning of a survey, rather than during. The paper form is only mailed upon request; otherwise, the respondent is directed to either complete the electronic version or download the form.

The NDAA (Guam Realignment Fund) placed a requirement on WHD to establish wage rates for Guam under the provisions of the DBA. The NDAA required that WHD establish wage rates for Guam each year until 90 percent of the funds for the Guam realignment project expired. This Act placed an additional requirement on WHD that it could not use the rates and employees working in Guam under the INA H-2B program when calculating the DBA rates.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Because WHD has an automated survey data system that generates contact letters notifying interested parties of upcoming surveys, WHD requests that all interested parties (e.g., national, state, and local unions; contractors; and contractor associations) identify the appropriate survey contact(s) for their organizations. WHD maintains this information in a central data bank and provides a list of active and planned wage surveys on its website (<https://www.dol.gov/agencies/whd/government-contracts/construction/surveys/status>), which broadens accessibility to other interested parties.

In accordance with the Government Paperwork Elimination Act, an electronic version of the WD-10 form is available through the WHD website (<https://www.dol.gov/agencies/whd/government-contracts/construction/surveys/wd10>), allowing respondents to complete and submit the form electronically online.

In addition to the notice letter, which will contain directions to the electronic version of the WD-10 and WD-10A, WHD will mail a paper version of the forms to those who elect this option.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

Generally, this information is not available from any other source. WHD has the sole responsibility for determining prevailing wages under DBA, and there is no duplicative effort to obtain this information. However, where appropriate, WHD uses state or local prevailing wage rates or data to determine the Davis-Bacon prevailing wage.

5. If the collection of information impacts small businesses or other small entities describe any methods used to minimize burden.

This information collection does not have a significant economic impact on a substantial number of small entities. To minimize burden, WHD has designed the information collection to request the minimum information necessary for WHD to determine prevailing wages as required under the DBA. Furthermore, WHD's request that respondents provide contractor or subcontractor

information on a WD-10A form does not add burden. Such information was previously requested from any respondent completing the WD-10 form—as the question was a part of the WD-10 form itself. WHD deleted the section of the WD-10 that requests such information during the survey and replaced it with the WD-10A, which is designed to be completed prior to the survey starting—giving WHD a larger base of potential survey participants at the outset.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

WHD's ability to issue WDs based on current prevailing wage rates for various localities throughout the country would be impacted if the agency were to collect the information less frequently. Outdated wage determinations and missing wage rates can impact WHD's ability to effectively administer and enforce the Davis-Bacon Act and ensure laborers and mechanics on covered projects are paid the wages that prevail locally for the trade they performed.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances associated with the conduct of these information collections.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize

public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record-keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On February 25, 2026, the Department published a notice in the *Federal Register* inviting public comments about this information collection (91 FR 9300). No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

The Department offers no payments or gifts to respondents in connection with this information collection.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

WHD informs respondents that it will keep their identity confidential to the maximum extent possible under existing law. As a practical matter, the Department would only disclose information collected under these requests in accordance with the provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552, and its attendant regulations at 29 CFR 70; and the Privacy Act of 1974, 5 U.S.C. 552a, and related regulations at 29 CFR 71. The Department has disclosed summaries of the wage data used to determine prevailing wages and fringe benefits but not the names and addresses of the respondents who submitted the data.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The Department does not request sensitive information in these information collections.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under “Annual Cost to Federal Government.”**

Forms WD-10 & WD-10A

Based on actual three-year averages with the WD-10 collection instrument, the Department estimates that 258 respondents complete 2,832 responses annually. The Department estimates a respondent requires 20 minutes to complete each WD-10 form.

Based on actual three-year averages with the WD-10A collection instrument, the Department estimates that 18 respondents complete 22 responses annually. The Department estimates a respondent requires 10 minutes to complete each WD-10A form.

Without specific wage data regarding respondents, WHD has used the January 2026 average hourly earnings for workers in the private sector on nonfarm payrolls to estimate employer burden costs. Bureau of Labor Statistics (BLS), [The Employment Situation, March 2026, Table B-3](#).¹ The median hourly wage is \$37.15, plus an additional 42 percent benefits cost (estimated using average annual private industry costs from BLS, [Employer Costs for Employee Compensation](#)), and overhead costs of 17 percent.

$$(\$37.15 \times 0.42) + (\$37.15 \times 0.17) + \$37.15 = \$59.07$$

Form	Number of Respondents	Number of Responses per Respondent	Total Annual Responses	Average Burden per Response	Total Burden Hours	Hourly Wage Rate	Monetized Value of Time
WD-10	258	10.22	2,832	0.3333333 33 h (20	944	\$59.07	\$55,762.08

¹ WHD used the most recent *final* data from the “Employment Situation, March 2026,” i.e., January 2026 data. The March 2026 edition only provides *projected* data for February and March 2026.

				minutes)			
WD-10A	18	1.22	22	0.1666666 66667 h (10 minutes)	3.666	\$59.07	\$216.55
Total	276		2,854		947.66		\$55,978.63

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information (Do not include the cost of any hour burden already reflected on the burden worksheet).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

The Department associates no respondent costs with the subject information collections, other than the value of time, which is accounted for in response to question 12, above. For the few respondents who use the PDF version it can be emailed to WHD, thus no mailing costs would be incurred.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this

collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The Department estimates the following federal costs associated with this information collection, processing WD-10 and WD-10A forms.

Form WD-10

Respondents complete and submit WD-10 forms via WHD's online platform. WHD no longer mails WD-10 paper forms, WD-10 forms can be completed electronically and emailed to WHD.

A WHD employee conducts an initial review of each WD-10 to determine if the form contains accurate and sufficient information or if it needs follow-up work by other WHD staff. This review is brief and cursory and takes a maximum of 30 seconds to review each WD-10. The work is performed by a WHD employee at either the GS-12, Step 4 pay grade or GS-13, Step 4 pay grade. For these purposes, WHD will use the employee with the higher pay grade, GS-13, Step 4 with a rate of \$55.54 per hour.²

$$0.5 \text{ minutes} \times 2,832 \text{ WD-10 forms} = 1,416 \text{ minutes}$$

$$1,416 \text{ minutes} \div 60 \text{ minutes} = 23.6 \text{ hours}$$

$$23.6 \text{ hours} \times \$55.54/\text{hr.} = \$1,310.74$$

WHD staff spend an average of 11.1 minutes reviewing the information on the WD-10. Approximately 40 percent of submitted WD-10 forms take a short amount of time to review and process, approximately 1 to 2 minutes (an average of 1.5 minutes). Approximately 60 percent of WD-10s submitted require closer analysis by WHD staff and/or follow up with the respondent to clarify or obtain additional information which could take approximately 15 to 20 minutes (an average of 17.5 minutes) per WD-10 submitted. The work is performed by a WHD employee at a GS-11, Step 4 pay grade at a rate of \$39.36 per hour.³

$$(1.5 \text{ mins} \times 0.40) + (17.5 \text{ mins} \times 0.60) = 11.1 \text{ minutes per WD-10}$$

$$11.1 \text{ mins} \times 2,832 \text{ WD-10 forms} = 31,435.2 \text{ minutes}$$

$$31,435.2 \text{ minutes} \div 60 \text{ minutes} = 523.92 \text{ hours}$$

$$523.92 \text{ hours} \times \$39.36/\text{hr.} = \$20,621.49$$

$$\text{Federal costs for form WD-10: } \$1,310.74 + \$20,621.49 = 21,932.23$$

Form WD-10A

² Based on Rest of United States locality pay from OPM 2026 General Schedule (GS) Locality Pay Tables, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/RUS_h.pdf.

³ Based on Rest of United States locality pay from OPM 2026 General Schedule (GS) Locality Pay Tables, https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/RUS_h.pdf.

Virtually all form WD-10As are submitted via WHD's online platform. WD-10A forms are also available online in PDF format for survey respondents to complete and submit via email, however, WHD has not received any WD-10A this way in the past three years. All WD-10A forms are submitted via the online platform, the data is automatically populated into WHD's wage survey subcontractor contact database. WHD staff does not process these forms. Therefore, the federal costs associated with form WD-10A is \$0.00.

Total federal costs for forms WD-10 and WD-10A: \$21,932.23 + 0 = \$21,932.23

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

Respondents: The number of respondents decreased from 3,641 to 276. This decrease in respondents was due to WHD conducting substantially fewer wage surveys over the past few years, which resulted in fewer respondents using the WD-10 and WD-10A forms.

Responses: The number of responses decreased from 21,939 to 2,854. This decrease in responses was due to WHD conducting significantly fewer wage surveys over the past few years, which resulted in fewer WD-10 and WD-10A forms being completed and submitted to WHD.

Burden Hours: The total number of burden hours decreased from 7,161 hours to 948 hours also due to the decrease in respondents.

Costs to Respondents or Recordkeepers: Supporting Statement-Part A, Item 13 There was no change in costs to respondents and recordkeepers. There are no costs associated with Item 13.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The Department does not plan to publish results of this information collection. Although the raw data are not published, the results of these information collections are used to calculate prevailing wage rates which are published in wage determinations on Sam.gov. These are ongoing collections, the schedule for which is found at <https://www.dol.gov/agencies/whd/government-contracts/construction/surveys/status>.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The Department does not seek an exception to the requirement to display the expiration date for OMB approval of these information collections.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The Department is not requesting an exception to any of the certification requirements for these information collections.

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Part B: EMPLOYING STATISTICAL METHODS

N/A