



**U.S. Department of Housing and Urban Development**  
Philadelphia Regional Office  
The Wanamaker Building  
100 Penn Square East, 11<sup>th</sup> Floor  
Philadelphia, PA 19107-3380

SEP 24 2019

The Honorable Byron W. Brown  
Mayor, City of Buffalo  
City Hall – Room 201  
Buffalo, NY 14203

Dear Mayor Brown:

Recently, Mr. Gary J. Kinsel of our Buffalo Office conducted an on-site monitoring review of your agency's federal labor standards administration and enforcement activities under the Housing and Community Development Act of 1974, as amended.

The enclosed monitoring report provides our evaluation of your agency's performance in the administration and enforcement of federal labor standards in your community development activities. Based on the information reviewed, we find that your agency's overall performance in these areas is adequate. A more detailed review is included in the narrative summary attached to this letter. There are no findings and no corrective actions are necessary.

The cooperation of the City in this review is greatly appreciated. Should you have any questions concerning this review or other matters pertaining to federal labor standards, please contact Gary J. Kinsel, Labor Standards Specialist, at 716-551-5755 Ext. 5003 or via e-mail at [Gary.J.Kinsel@hud.gov](mailto:Gary.J.Kinsel@hud.gov).

Sincerely,

A handwritten signature in blue ink that reads "Debra A. Bensala".

Debra A. Bensala  
Regional Labor Relations Officer  
Philadelphia/New York/New Jersey Region

Enclosures  
cc: Mr. Francisco Guzman

# FEDERAL LABOR STANDARDS MONITORING REVIEW REPORT

## CITY OF BUFFALO COMMUNITY DEVELOPMENT PROGRAM SUMMARY

An on-site monitoring review of the City of Buffalo's (City) performance in the administration of HUD programs subject to federal labor standards provisions was recently conducted by Gary J. Kinsel of the HUD Office of Davis-Bacon and Labor Standards (DBLS). This review was conducted in accordance with the Housing and Community Development Act of 1974, as amended. For this review, we examined documents from your agency's files concerning three contracts. These documents included information on the administration and enforcement of the contracts (bid and contract information, payrolls, employee interviews and related documentation, etc.) as well as internal operating documents and Semi-Annual Labor Standards Enforcement reports.

Labor standards administrative and enforcement files for the projects identified below were selected for review as representative of current or recent activity to which federal labor standards are applicable:

<b>Project Description</b>	<b>Contract Amount</b>	<b>Bid/Award Dates</b>	<b>Percent Complete</b>
<b>City wide milling and overlay CDBG Year 43</b>	\$846,659	3/14/18 4/2/18	100%
<b>City Wide sidewalks</b>	\$484,494	3/14/18 4/23/18	100%
<b>Gloria Park Community Center - HVAC</b>	\$442,374	5/9/17 5/24/17	100%
<b>Total</b>	<b>\$1,773,527</b>		

A review of the City's procedures and organizational structure and its administration of the projects selected for review resulted in no findings in the areas of federal labor standards administration and enforcement that require corrective action.

### Narrative Summary

The contract files reviewed contained the required compliance information. This included bid dates, contract award dates, scopes of work, contract start dates and enforcement files. The City employs the use of a file Checklist and Initial/Final Labor Standards Compliance Report to organize the file. These documents make review for compliance effective and efficient. The City's labor standards compliance officer, Mr. Francisco Guzman has excelled in file organization and administration of federal labor standards.

The City has been cooperative in its timely submission of the Semi-Annual Enforcement Report (SAR) and all information and documents requested by DBLS. Town staff most recently attended a DBLS training session. During the exit conference, it was noted that additional technical assistance is available to the City staff for any other questions and/or concerns that may arise.

