

DATE SUBMITTED

5/14/2025

SUBMITTED BY

COMMUNITY  
DEVELOPMENT  
DIRECTOR

DATE ACTION REQUIRED

5/21/2025

COUNCIL ACTION (x)  
PUBLIC HEARING REQUIRED ( )  
RESOLUTION ( )  
  
ORDINANCE 1<sup>ST</sup> READING ( )  
ORDINANCE 2<sup>ND</sup> READING ( )  
CITY CLERK'S INITIALS ( )

## IMPERIAL CITY COUNCIL AGENDA ITEM

SUBJECT: DISCUSSION/ACTION:  
  
LABOR COMPLIANCE CHANGE ORDER FOR CIP 815 – 7<sup>TH</sup>, 10<sup>TH</sup>, 14<sup>TH</sup> STREET REHABILITATION PROJECT  
  
1. APPROVE CHANGE ORDER FOR LABOR COMPLIANCE MONITORING SERVICES FOR CURRENT AGREEMENT (RFP P2402-02)

DEPARTMENT INVOLVED: COMMUNITY DEVELOPMENT

### BACKGROUND/SUMMARY:

The City received a proposal for additional contract days for labor compliance monitoring services.

The City currently has a contract with Labor Compliance Consultants of Southern California ("LCCSC") for Labor Compliance monitoring services for the 7<sup>th</sup>, 10<sup>th</sup>, 14<sup>th</sup> Street Rehabilitation project. The original contract was for 90 calendar days; however, additional construction days are needed due to additional work required for the project. The additional work added was for a water pipeline, removal and replacement of an 8-inch sanitary sewer main, and a storm drain which required additional labor compliance monitoring services. The proposal received is for an additional **80 calendar days** in a "not to exceed amount" of \$6,000.00.

FISCAL IMPACT: **\$6,000.00**

ADMIN  
SERVICES SIGN  
INITIALS

JMS

### STAFF RECOMMENDATION:

1. Staff recommends approval of Labor Compliance Change Order No. 1 in the amount of **\$6,000.00**.

DEPT. INITIALS

OM

### MANAGER'S RECOMMENDATION:

approve

CITY MANAGER'S  
INITIALS

CTM

### MOTION:

SECONDED:

AYES:

NAYES:

ABSENT:

APPROVED ( )

DISAPPROVED ( )

REJECTED ( )

DEFERRED ( )

REFERRED TO:



**City of Imperial**  
**Community Development Department**  
400 South Imperial Avenue, Suite 101  
Imperial, CA 92251  
Phone: (760) 355-1152  
Fax: (760) 355-4718

# LABOR COMPLIANCE CHANGE ORDER

Distribution to:

April 16, 2025

- ☐ OWNER
- ☐ ENGINEER
- ☐ CONTRACTOR
- ☐ FIELD
- ☒ OTHER

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## CHANGE ORDER NO. 1

PROJECT: City of Imperial  
7<sup>th</sup>, 10<sup>th</sup>, 14<sup>th</sup> Streets Rehabilitation Project  
BID 2024-01

TO: ***Labor Compliance Consultants of Southern California***  
Crystal Ransdell  
P.O. Box 15937  
San Diego, CA 92175  
Phone: (760) 791-6914

Labor compliance services is directed to make the following changes(s) to the original contract:

1. Additional construction work requiring additional Labor Compliance monitoring for an additional **80 calendar days** for a "**not to exceed cost of: \$6,000.00**"

Original Contract:	\$7,200.00
Change Order No. 1	\$6,000.00
<b>New Contract Amount:</b>	<b>\$13,200.00</b>

Not valid until signed by both the Owner and labor compliance services.

Signature indicates his agreement herewith, including any adjustment in the contract sum or contract time.

Authorized by:

***City of Imperial***

420 South Imperial Avenue  
Imperial, CA 92251

By:

Date:

\_\_\_\_\_  
Dennis H. Morita  
City Manager

***Labor Compliance of Southern California***

P.O. Box 15937  
San Diego, CA 92175

By:

Date:

\_\_\_\_\_  
Crystal Ransdell



**Additional Labor Compliance  
Consulting Services  
For**

**City of Imperial  
7<sup>th</sup>, 10<sup>th</sup> & 14<sup>th</sup> Streets Rehabilitation Project**

**P2402-02**

**April 2, 2025**

**Prepared by: Crystal Ransdell**

**Labor Compliance Consultants Of  
Southern California LLC  
P O Box 15937  
San Diego, CA 92175  
760-791-6914**

**Requested by:**

**City of Imperial  
Community Development Department  
Denise Goff  
400 S. Imperial Avenue, Suite 101  
Imperial, CA 92251**

## I. EXECUTIVE SUMMARY

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### HISTORY OF FIRM & SUMMARY OF QUALIFICATIONS

**Labor Compliance Consultants of Southern California (LCCSC)** is a consulting firm offering Labor Standards Compliance Consulting and Contractor Monitoring services to both private and public-sector clients in Southern California and Western Arizona. LCCSC recommends and will perform training in office to all the contractor's labor compliance staff and supervisors. We have a staff of trained and experienced labor compliance monitors and interviewers.

LCCSC has provided labor compliance consulting services to our governmental sector clients in ensuring Federal and State of California Labor Standards Compliance on many of their public works projects. The Staff of LCCSC has attended several training sessions pertaining to the California Department of Industrial Relations prevailing wage requirements for public works projects and has attended two Labor Compliance Program seminar trainings at Fresno State University. Individual training by Ms. Karen Belcher with the Department of Apprenticeship Standards has provided up to date training per the California Labor Code § 1777.5, the apprenticeship requirements, to the LCCSC Staff. Additionally, the LCCSC Staff has attended numerous training sessions provided by the Housing and Urban Development Department for public works projects. The training sessions reviewed compliance with Davis Bacon and Related Acts and Wage Guidelines. LCCSC maintains a bilingual Labor Standards Compliance Staff for onsite worker interviews to assist in facilitating accurate data collection and reporting.

LCCSC has provided Labor Standards Compliance Services for the cities of Westmorland, Brawley, Imperial, Holtville, Calexico and El Centro in addition to the County of Imperial. LCCSC has provided Labor Standards Compliance Services for private clients, including but not limited to Chelsea Investment Corporation, Emmerson Construction, TCI Construction, Trademark Construction, and JMR Construction of Chattanooga Tennessee. LCCSC has provided Labor Standards Compliance Services for several types of infrastructure related projects including but not limited to building construction, water, sewer and storm infrastructure improvements, roadway improvements and various others construction related projects.

LCCSC has performed the monitoring activities of the 3<sup>rd</sup> Party Labor Compliance Program operations for the Calexico Unified School District has performed as Labor Compliance Monitor for the City of Brawley's LCP for the park project funded through proposition 84 bonds. LCCSC has performed the Labor Compliance Monitoring for the City of El Centro's LCP for the Skate Park project also funded through proposition 84 bonds. A list of labor standards compliance projects is included herein.

#### PRIMARY CONTACT

Mrs. Crystal Ransdell  
Senior Labor Standards Compliance Officer  
P.O. Box 15937  
San Diego, CA 92175  
(760) 791-6914  
[cransdell@lccsc.net](mailto:cransdell@lccsc.net)

#### ORGANIZATIONAL CHART

**Ms. Crystal Ransdell, CFO**  
**Senior Labor Compliance Officer**  
**CPR / DIR / DBRA Specialist**

**Ms. Launa Zanella**  
**Senior Labor Compliance Officer**  
**CPR / DIR / DBRA Specialist**

**Tiffany Dessureau**  
**Labor Compliance Officer**  
**CPR / DIR / DBRA**

#### PROJECT TEAM HIGHLIGHTS:

LCCSC is a professional services firm well-seasoned in Labor Standards Compliance. LCCSC's labor compliance staff has worked on various construction projects in the Imperial County. Therefore, LCCSC would be highly sensitive to the needs of our clients herein Southern California and Western Arizona.

**LCCSC IS DBE CERTIFIED AND SWBE CERTIFIED FIRM ID 44834**

#### EQUAL EMPLOYMENT OPPORTUNITY EMPLOYER

To provide employment and advancement opportunities to all individuals, employment decisions at Labor Compliance Consultants of Southern California are based on merit, qualifications, and abilities. Except where required or permitted by law, employment practices are not influenced or affected by an applicant's or employee's race, color, religion, sex, national origin, age, disability, or any other characteristic protected by law.

## II. PROJECT APPROACH & SCOPE OF WORK

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LCCSC shall be responsible for assisting **City of Imperial** with activities needed to ensure that workers employed by the Prime Contractor and any subcontractors are hired and paid in compliance with all applicable State and Federal Laws. Mrs. Ransdell shall serve as the contact person for all issues related to labor standards compliance pertaining to this project.

**The project consists of the Labor Compliance Monitoring for**

**Additional monitoring for time extension of City of Imperial 7th, 10th & 14th Streets  
Rehabilitation Project approximately 80 calendar days**

Many different subcontractors and worker classifications will be present at the site which may require a substantial amount of Labor Standards Compliance oversight. It is critical that the labor compliance officers be involved at the commencement of the project to ensure timely compliance with the various aspects of labor standards compliance laws. Mrs. Ransdell shall prepare the current wage decisions and review the construction contract to ensure the required contract verbiage is included in the prime contractor's contract with his subcontractors.

**The estimated construction time is eighty (80) calendar days from the date on the notice to proceed. The labor standards activities are expected to extend for a total of five (5) months. Two and one half (2.5) months of construction and two and one half (2.5) months following completion of the construction to obtain the final documentation from all contractors and subcontractors.**

**Labor Standards Compliance Services will include the following:**

**A. Wage Decisions Monitoring**

LCCSC shall obtain the applicable Federal Wage Decisions from the awarding agency as required and monitor any modification and applicable changes to the various worker classifications applicable to this project. LCCSC shall notify **City of Imperial** of any modifications made to worker wage decisions.

**B. Contractor Eligibility, Certifications and Pre-Construction Conference**

LCCSC will perform the following duties:

1. LCCSC shall research all bidding General Contractors to ensure they are not debarred. Following the bid openings and the project award, LCCSC shall verify the General Contractor and sub-contractor's eligibility through the Federal debarment lists.
2. LCCSC shall attend the Pre-Construction Conference and provide a labor standards compliance handout of the Department of Labor information pertaining to public works projects. LCCSC shall be made available for further consultation by telephone or email and labor standards compliance training as requested. LCCSC recommends that a pre-construction training session concerning labor standards provision, administration, and enforcement be conducted.
3. LCCSC shall make available to the contractors and sub-contractors the required forms, documentation and contract language requirements.

**C. Monitoring of Certified Payroll Reports, On Site Employee Interviews, and Progress Payment Review Assistance.**

1. **Payroll Reviews:** LCCSC shall review certified payroll reports and ensure compliance with federal regulations. Submitted payrolls shall be reviewed promptly for compliance with applicable labor standards. LCCSC will review fringe benefits, deductions, and computations verifying that all required information is provided. Comments and correction notices pertaining to the submitted subcontractor documentation shall be forwarded to **City of Imperial** and the Prime Contractor promptly.

2. **Review of Employee Reviews:** LCCSC will be responsible for conducting on-site interviews with various employees of the contractor/sub-contractors to include at least ten percent (10%) of the workers in all job classifications to be compared against applicable payrolls for compliance with wage decisions.
3. **Request for Information:** LCCSC shall inform **City of Imperial** in writing, immediately upon receipt of a Request for Information (RFI) from an individual or individuals requesting copies of any forms or documents. LCCSC shall respond accordingly to all RFI's received on behalf of **City of Imperial**, the Prime Contractor, and all subcontractors.
4. **Progress Payment Review Assistance:** LCCSC shall assist **City of Imperial** and Prime Contractor to ensure compliance with labor standards. Once each month LCCSC will perform a complete review of all labor compliance files and will prepare an End of the Month Report (EOM) and forward to **City of Imperial** and Prime Contractor informing of the status of the labor compliance files. When contractors are delinquent or tardy in providing labor compliance documentation, it will be noted and LCCSC will inform **City of Imperial** department so they may withhold progress payment as needed.

#### **D. Correction of Violations**

In the event that non-compliance of labor standards results in underpayment to employees, LCCSC will take immediate action limited to the following:

1. **Notification:** LCCSC shall immediately notify **City of Imperial** and the prime contractor of wage adjustments and requirements and shall notify the contractor in violation to immediately provide restitution and revisions to the certified payroll reports.
2. **Withhold Funds:** LCCSC shall recommend, if applicable, that **City of Imperial** and the Prime Contractor withhold sufficient funds from the subcontractor to provide restitution to under paid workers or to effectuate compliance and shall obtain full compliance from the subcontractor for any noncompliance issue.

#### **E. Labor Compliance Files**

1. LCCSC shall protect and maintain the labor compliance files in a locked secure cabinet for the duration of the project.

2. Upon completion of all construction activities and the labor compliance auditing requirements, LCCSC will provide to **City of Imperial** all original and additional copies of the Labor Standards Compliance documentation including but not limited to the certified payroll reports, fringe benefits statements, contracts, daily sign in sheets, contractor's license documentation, etc. **City of Imperial** shall keep and store for 5 years as required by law.
3. LCCSC shall make the labor standards compliance files available for inspection and review upon request by **City of Imperial** or to any State or Federal agency that has jurisdiction over this public works project and after construction activities have ceased. Upon request, LCCSC shall assist with any audit or review.

#### **F. Reports**

1. LCCSC shall prepare and submit all monthly, semi-annual and final reports, so that the **City of Imperial** has sufficient time for review prior to submitting them to the State of California Department of Housing and Community Development.

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#### **FEE SCHEDULE FOR SERVICES**

Our 2025 Fee Schedule for Labor Standards Compliance Services is included in this Proposal. Our Fee Schedule shall be updated each calendar year. The updated Hourly Rate Structure for Labor Standards Compliance Services shall be subject to review and approval by **City of Imperial** prior to implementation on this project.

### **VI. FEE SCHEDULE**

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#### **I. SCHEDULE AND COMPENSATION**

LCCSC shall provide Labor Compliance Services as outlined in within the contents of this proposal. In the event completion of the project extends beyond eighty (80) days, additional services will be billed at the hourly rate per the schedule attached.

#### **II. PROPOSED ESTIMATED COSTS**

Understanding that the estimated start of construction is approximately April, 2025 and the construction is scheduled for eighty (80) calendar days. There are preliminary services before the start of construction and post completion services. LCCSC shall provide **City of Imperial** with the Labor Standards Compliance Services requirements with a not to exceed amount of **\$6,000.00**

LCCSC's services shall be invoiced in (5) monthly installments of \$1200.00 the end of each month beginning with the notice to proceed.

**Not to Exceed Costs: \$6,000.00**

In the event the construction time exceeds the ninety (90) calendar days or delays are caused by a contractor or subcontractor's noncompliance with labor standards and wage rate decisions causing the labor compliance monitoring to exceed the estimated five (5) months of monitoring, the monthly rate will adjust to hourly and the **"not to exceed" amount will no longer apply.**

**HOURLY RATE AND REIMBURSABLE EXPENSE SCHEDULE FOR ADDITIONAL SERVICES**

*Effective January 1, 2025 through December 31, 2025*

<b>Labor Standards Services</b>	
Senior Labor Compliance Officer	\$90.00/hour
Bilingual Interviewer	\$75.00/hour

Prepared by:

*Crystal Ransdell*

April 2, 2025

Crystal A. Ransdell  
Labor Compliance Consultants of Southern California  
P.O. Box 15937  
San Diego, CA 92175