Davis-Bacon Surveys Are Reliable and Robust

Using *Occupational Employment and Wage Statistics* and *National Compensation Survey* Data for Prevailing Wages Would Cut Construction Worker Pay and Benefits



Frank Manzo IV
Jacob Hager

Illinois Economic Policy Institute

October 2026

Executive Summary

The Davis-Bacon Act has upheld local labor market standards and ensured a level playing field for contractors bidding on federally-funded and federally-assisted construction projects since 1931. The law establishes prevailing wages—or minimum wages—for different types of skilled construction workers. Related Acts ensure prevailing wages are paid when financial assistance like federal grants or loans fund the state, local, and private construction projects. Overall, the Davis-Bacon Act and Related Acts collectively apply to $217 billion in federal and federally-assisted construction spending per year and provide minimum wage rates for 1.2 million blue-collar construction workers. Research shows that the Davis-Bacon Act and Related Acts promote job quality, boost apprenticeship training, strengthen the economy, and deliver great value to taxpayers.

The Wage and Hour Division (WHD) at the U.S. Department of Labor administers the Davis-Bacon Act and conducts regular surveys to gather detailed data on wages and fringe benefits paid by job classification and by county. The WHD communicates with industry stakeholders when conducting surveys, and the underlying data can be challenged for reliability or correctness. Comprehensive regulatory updates in 2023 modernized administrative procedures and enforcement mechanisms, making Davis-Bacon prevailing wage rates even more robust and reliable than ever before.

However, some opponents of prevailing wages have argued for discarding Davis-Bacon surveys and replacing them with *Occupational Employment and Wage Statistics* (OEWS) wage data and *National Compensation Survey* (NCS) benefits data—even though Congressional Budget Office (CBO) estimates reveal that such a move would fail to make a dent in the federal budget deficit.

Switching to OEWS and NCS data would erode the prevailing wage and benefits paid to construction workers:

- **OEWS wage rates exclude voluntary fringe benefits and NCS data on benefits is not localized.** OEWS data do not include information on training contributions, health insurance payments, or pension payments—and NCS data ignores privately-negotiated differences by region and by craft.
- **OEWS wage rates and NCS benefits overrepresent residential construction.** Nearly half of the OEWS and NCS data comes from residential construction, which is a low-skill, low-wage, low-benefits sector of construction. This severely skews the wages and benefits downward.
- **Neither OEWS nor NCS distinguish between journeyworkers and apprentices.** A beginning apprentice typically earns about 50 percent of the journeyworker rate. Relying on OEWS and NCS data would artificially lower the average prevailing wage for skilled journeyworkers.
- **OEWS and NCS do not report data by local counties and do not survey construction worksites.** They attribute contractor work to the contractor's business address, regardless of project location.
- **OEWS produces rates based upon income intervals.** OEWS allows employers to report worker earnings in annual income interval ranges, rather than precise hourly wage rates.
- **OEWS does not reflect wage rates actually paid to workers in their communities.** Unlike the USDOL's three-step process, OEWS rates are artificial averages paid to no one.
- **OEWS data is often based on small sample sizes relative to the number of construction occupations and local construction markets.** Some OEWS wages are based on "only a handful of employers" and use data that is up to three years old.
- **OEWS and NCS data are not transparent.** While the wage survey process encourages and accepts data from all available sources, stakeholder participation is restricted under OEWS.
- **Switching to OEWS and NCS data would cut construction worker pay by between 6 and 23 percent and slash benefits by between 50 and 65 percent.** The results from two case studies highlight how OEWS and NCS data would distort blue-collar compensation below area market standards.

For these reasons, a Commissioner of the Bureau of Labor Statistics (BLS) has definitively concluded that this data is not intended for or useful for Davis-Bacon prevailing wages: "*BLS has no role in establishing prevailing wages or determining what data are appropriate for that purpose*."

Ultimately, OEWS and NCS data are not suitable for taxpayer-supported construction and would result in a failure to meet the Davis-Bacon Act's goal of sustaining local construction market standards.

Table of Contents

Executive Summary i

Introduction 1

The Economics of Prevailing Wages 2
Strengthening Local Businesses and Delivering a Skilled Workforce 2
Upholding Local Market Wages and Ensuring the Best Value for Taxpayers 3

Davis-Bacon Prevailing Wage Determinations Are Localized and Transparent 4

Problems with Using OEWS and NCS Data for Prevailing Wage Determinations 5

The Potential Impact of Using OEWS and NCS Data for Prevailing Wage Determinations 8

Conclusion 12

Sources 13

About the Authors

Frank Manzo IV, MPP is an Economist at the Illinois Economic Policy Institute (ILEPI). He earned his Master of Public Policy from the University of Chicago and his Bachelor of Arts in Economics and Political Science from the University of Illinois at Urbana-Champaign.

Jacob Hager, MA is a Research Analyst at the Illinois Economic Policy Institute. He earned a Master of Arts in the Social Sciences with a Concentration in Economics from the University of Chicago and Bachelor of Science degrees in Economics and Mathematics from the University of Missouri.

Introduction

Prevailing wage laws establish minimum wages for different types of skilled craft workers on taxpayer-funded, taxpayer-subsidized, and ratepayer-funded projects that are based on the wages, benefits, and workforce training investments paid for similar work in the local area where the projects are to be completed (Philips, 2022; Duncan & Ormiston, 2018; Philips, 2015). These rates are designed to reflect the compensation that blue-collar construction workers in a given community actually receive for comparable work on similar projects, including in the private sector (Philips, 2015). Currently, 29 states have prevailing wage laws and the District of Columbia is subject to the federal Davis-Bacon Act (WHD, 2024; Michigan Legislature, 2023).

The federal Davis-Bacon Act was enacted in 1931 to establish prevailing wages and benefit rates on federally-funded and federally-assisted construction projects (Whittaker, 2007). The law was cosponsored by two Republicans, Congressman Robert Bacon of New York and former Secretary of Labor and then-Senator James Davis of Pennsylvania, and signed by President Herbert Hoover, also a Republican. The main purpose of the Davis-Bacon Act is to protect local construction standards in the competitive low-bid process by ensuring that public expenditures maintain and reflect local market-based standards of compensation and craftmanship (Duncan & Ormiston, 2022). In fact, the architects of the Davis-Bacon Act pointed to "itinerant" contractors with low-wage nonresident labor competing unfairly with local companies as a rationale for the policy (Whittaker, 2005).

The Davis-Bacon Act has been amended multiple times since its enactment in 1931 as the construction industry has adapted to complex labor market dynamics. The Copeland Anti-Kickback Act of 1934 established penalties for contractors who forced workers to give back legally-required compensation, prevailing wages were changed to be pre-determined before a project rather than after the workforce was hired, debarment for noncompliant contractors was included to enforce the law, and the threshold for application of the Act was lowered from $5,000 to $2,000 (Whittaker, 2007). The Act has been amended to cover both cash wages and fringe benefits (Whittaker, 2007). Additionally, dozens of "Related Acts" apply Davis-Bacon prevailing wage standards to federally-assisted state, county, and municipal construction projects and those receiving grants, loans, or other financial assistance from the federal government.

In 2023, the U.S. Department of Labor issued a final rule updating and strengthening the Davis-Bacon Act's regulations (WHD, 2023). The rule modernized Davis-Bacon protections and enforcement mechanisms, improved the methodology for determining prevailing wage rates, ensured prevailing wage determinations would be updated more frequently, and enabled broader authority to adopt state and local wage determinations to better reflect market conditions, among many other changes (WHD, 2023).

There have been efforts to weaken prevailing wage laws, including the Davis-Bacon Act. These range from altering the methodology used in wage determinations to outright repeal, predicated on the unwarranted assumption that reducing labor costs by lowering the incomes of skilled construction workers would translate into lower overall construction costs. This claim ignores linkages between wages and productivity, apprenticeship training, worksite safety, efficient materials usages, and the quality of work performed (Duncan, 2024; Manzo, Bruno, & Petrucci, 2023; Philips, 2022; Duncan & Ormiston, 2018; Bilginsoy, 2005; Li et al., 2019). Think tanks, politicians, and commentators who oppose prevailing wages often contrast Davis-Bacon rates with *Occupational Employment and Wage Statistics* (OEWS) and *National Compensation Survey* (NCS) data compiled by the Bureau of Labor Statistics (BLS) at the United States Department of Labor that is intended for research purposes only, arguing that prevailing wage rates are too high. The opposite is true, however: using OEWS

and NCS data would result in hourly wages and fringe benefit rates that are considerably below competitive market rates that are actually paid in local economies for skilled craft workers.

This report details the pitfalls of using OEWS and NCS data in Davis-Bacon prevailing wage determinations. The report begins with a brief discussion on the economics of prevailing wage standards before reviewing the current wage determination process. Then, the problems with switching to OEWS and NCS data are addressed, including a brief critique of the nonpartisan Congressional Budget Office's periodic mention of repealing the Davis-Bacon Act to help reduce the federal budget deficit. Estimated impacts on construction worker wages and benefits from switching to OEWS and NCS are also provides. A concluding section recaps key findings.

The Economics of Prevailing Wages

The primary purpose of prevailing wage laws is to uphold local labor market standards and ensure that competition among contractors for taxpayer-supported projects is based on efficiency, quality, and project management rather than on the ability to reduce worker pay or training investments (Kelsay & Pleites, 2022; Duncan & Ormiston, 2018). In the low-bid model in public procurement, contractors aim to lower their bids however possible, including through cutthroat reductions in worker wages, benefits, and apprenticeship training, in order to win bids on short-term projects. Additionally, large infusions of government spending into an area and a process that rewards the lowest bidder may attract contractors from areas with low wages and less investment in workforce training, which could erode standards in the local construction market. Prevailing wage laws help to correct this market failure. By preventing public bodies, utilities, and organizations receiving government funds and incentives from awarding bids to contractors that pay less than the privately-negotiated local market rate, prevailing wage laws promote a level playing field for local businesses and ensure that workers can afford to live in the communities where they are building construction projects (Philips, 2015).

Strengthening Local Businesses and Delivering a Skilled Workforce

Economic research has found that prevailing wage laws create a level playing field for local contractors. In-state contractors are 8 percent more likely to be awarded federal highway projects that pay Davis-Bacon prevailing wages compared to similar projects that do not pay prevailing wages (Manzo, 2021). Local contractors account for a 10 percent higher market share when prevailing wages are paid on public school projects and county-resident contractors account for 16 percent higher market share when prevailing wages are paid on library construction projects (Manzo & Duncan, 2018; Duncan, 2011). By keeping tax dollars in the local economy, more labor income and consumer spending remain in communities due to prevailing wage.

Reflecting local market-based standards for wages, benefits, and training contributions in the communities where projects are being built also bolsters the system of registered apprenticeship in the United States. This is vital for cultivating a skilled and adaptable workforce within the inherently volatile, seasonal, and cyclical construction industry (Philips, 2022). Construction apprenticeship enrollments are up to 8 percent higher, and apprentices complete their on-the-job and classroom training faster, when prevailing wage standards are in place (Bilginsoy, 2005; Dickson Quesada et al., 2013). The result is that workers deliver higher levels of productivity and better safety outcomes. Productivity per construction worker is 14 to 33 percent higher when prevailing wage standards apply and on-the-job fatalities per 10,000 construction workers are 12 percent lower (Philips, 2014; Manzo, 2017). Indeed, an analysis of 13 repeals of state-level prevailing wage laws between 1970 and 2016 revealed an increase in construction injury rates of 13 percent (Li et al., 2019). Accordingly, prevailing

wage standards foster important human capital investments that yield a skilled, productive, and cost-effective construction industry.

Upholding Local Market Wages and Ensuring the Best Value for Taxpayers

In addition to ensuring that the next generation of construction workers is trained, productive, and safe, prevailing wage standards like the federal Davis-Bacon Act produce better economic outcomes for construction workers. Prevailing wage standards statistically increase construction worker earnings by between 4 and 16 percent per year (Manzo, Bruno, & Petrucci, 2023; Manzo, Gigstad, & Bruno, 2020; Manzo, Lantsberg, & Duncan, 2016; Duncan & Lantsberg, 2016; Philips, 2014). Due to their higher incomes from prevailing wage, 30 percent fewer construction workers live in poverty, 2 percent more construction workers own their homes, and federal, state, and local tax contributions from construction workers are 17 percent higher (Manzo, Lantsberg, & Duncan, 2016; Manzo, Gigstad, & Bruno, 2020; Philips & Blatter, 2017). Research has also found that prevailing wage standards expand access to employer-provided health insurance coverage, prevent worker misclassification and reduce payroll fraud, and make construction workers significantly less likely to rely on government assistance programs—such as Supplemental Nutrition Assistance Program (SNAP) food stamps and the Earned Income Tax Credit (EITC) assistance (Manzo, Lantsberg, & Duncan, 2016; Hinkel, 2021). Conversely, studies have shown that the prevailing wage repeals have led to an increased dependence on government assistance programs, demonstrating a cost shift and added burden onto taxpayers (Manzo, Bruno, & Petrucci, 2023)

Economic research has found that prevailing wage laws create a level playing field for contractors and have no effect on overall bid competition (Duncan & Ormiston, 2018). There have been five peer-reviewed studies since 2000 that examine the effect of prevailing wage laws on overall bid competition, and all five conclude that they do not reduce the number of bidders on public projects. This includes an examination of nearly 600 bids on public works projects in five northern California cities, an evaluation of about 500 bids on highway construction projects in Colorado, a study of nearly 700 bids on school construction projects in Ohio, an analysis of almost 300 bids on school construction projects in Nevada, and an investigation of nearly 3,500 bids on state and federal highway projects in Kentucky (Kim, Kuo-Liang, & Philips, 2012; Duncan, 2015a; Onsarigo, Duncan & Atalah, 2020; Duncan & Waddoups, 2020; Duncan, Gigstad, & Manzo, 2022).

Because prevailing wage laws are associated with stronger workforce supply pools and competitive bidding, the economic consensus is that prevailing wage laws have no effect on public works construction costs (Duncan & Ormiston, 2018). There have been 21 studies on the impact of prevailing wage laws on the cost of school construction, highway construction, and municipal building projects that have been published in peer-reviewed academic journals since 2000. Cumulatively, these peer-reviewed studies have analyzed more than 24,000 traditional public works projects. In total, 18 of these peer-reviewed studies (86 percent) find that prevailing wage laws have no effect on total construction costs (Duncan, 2024; Duncan & Ormiston, 2022; Duncan, Case, & Manzo, 2024). This includes 12 of 14 studies that evaluate the impact of prevailing wage laws on school construction costs and find no statistically significant effect (86 percent) (Manzo, Bruno, & Petrucci, 2023).

This cost neutrality is due to four main reasons. First, labor costs are a low share of project costs—representing just 23 percent of total construction costs across the United States (Census, 2024; Duncan, 2024; Manzo, Bruno, & Petrucci, 2023). Second, when wages rise in construction, contractors respond by utilizing more capital equipment and by hiring skilled workers to replace their less-productive counterparts—thereby increasing labor productivity (Balistreri, McDaniel, & Wong, 2003; Blankenau & Cassou, 2011). Third, contractors respond to higher wages by reducing expenditures on materials, fuels, and rental equipment and by accepting marginally lower profit

margins (Duncan & Lantsberg, 2015). Finally, prevailing wage standards improve job quality, apprenticeship training, worker productivity, and worksite safety—all of which reduce employee turnover and prevent costly project delays due to labor shortages (McFadden, Santosh, & Shetty, 2022; Manzo, Petrucci, & Bruno, 2022). Since labor costs are a low percent of total costs, improvements in labor productivity, material and fuel expenditures, and other items like worksite safety and worker turnover can more than offset any cost effect of prevailing wages (Duncan & Ormiston, 2018).

Davis-Bacon Prevailing Wage Determinations Are Localized and Transparent

The Davis-Bacon Act is administered by the Wage and Hour Division (WHD) of the U.S. Department of Labor. The WHD employs a meticulous survey process designed to accurately capture local labor market conditions. It conducts voluntary surveys to collect data on the compensation paid by private contractors for work on similar projects. These surveys gather detailed data on wages and benefits, categorized by specific job classification and local county. Wage determinations are based on detailed payroll submissions that account for both hourly wages and benefits (WHD, 2023).

The survey process results in Davis-Bacon wage determinations that are based on fair market wages paid to construction workers in 3,000 counties and localities across the nation. By including the total value of wages, health insurance, retirement plans, other fringe benefits, and training contributions by job classification where the work is performed, Davis-Bacon surveys reflect basic market standards that protect workers and ensure the best value for taxpayers.

The comprehensive nature of Davis-Bacon prevailing wage rates, which explicitly include voluntary fringe benefits, is critical. These benefits represent significant components of workers' total compensation packages and are essential for attracting, retaining, and developing skilled tradespeople (Philips, 2022; Kelsay & Pleites, 2022; Philips & Duncan, 2015; Duncan, 2015b). The Davis-Bacon system also accounts for apprentice wages, which are lower than journeyworker wages. This detailed approach based on craft, skills, and local market conditions makes Davis-Bacon surveys precise and appropriate for ascertaining prevailing wages for workers and contractors.

Davis-Bacon surveys are transparent. The WHD communicates with industry stakeholders in each area when conducting a survey, including contractors, trade associations, public agencies, and trade unions. The underlying data for wage determinations are available to the public and survey results can be challenged for reliability or correctness in established procedures.

The Davis-Bacon survey process is reliable and valid. Survey results, which are market-specific and conducted in individual states for the heavy, highway, building, and residential construction sectors, are published on an accessible website and available for instantaneous access by contractors, agencies, workers, and the public. Surveys use clearly specified processes and the survey results can be easily replicated by affected parties to obtain the underlying wage data to determine if they are correct. Petition procedures are also available for the reconsideration of one or more published rates to ensure validity and present additional or corrected data for review (Jordan et al., 2006).

Davis-Bacon surveys are robust. In 2023, the U.S. Department of Labor updated its administrative practices and regulations to make Davis-Bacon surveys more applicable (WHD, 2023; Duncan & Ormiston, 2022). Core changes included a return to the "three-step" method for determining prevailing wages, which sets the prevailing wage as the rate paid to the majority of workers in a specific classification and area or, if that is not met, the rate paid to at least 30 percent of workers or, if neither of those criteria are met, then a weighted average rate (Kelsay & Pleites, 2022; Philips, 2022). The first two steps of the "three-step" rule increase the likelihood that the prevailing wage will

reflect an actual wage rate paid to workers in their communities, as opposed to an artificial weighted average paid to no one. The reforms also allowed for the adoption of state or local prevailing wages when their determination methods are "substantially similar" to the federal process. Periodic adjustments to nonunion wage rates using data from the *Employment Cost Index* have been included to ensure they remain up-to-date between surveys (WHD, 2023). Many other changes helped improve the relevance and timeliness of Davis-Bacon prevailing wage rates.

The updates strengthened enforcement and compliance as well (WHD, 2023). As examples, an "operation of law" provision required contractors to adhere to Davis-Bacon standards even if federal agencies mistakenly omit the required clauses in contracts. New anti-retaliation provisions protected workers against reprisal for reporting violations. Contractor debarment standards were harmonized to mandatory three-year terms. Prevailing wage coverage was clarified for industries like solar, wind, and broadband infrastructure when federal assistance was provided. Contractors were also required to preserve payroll records for at least three years after projects are completed. Employer associations and business groups supported these changes, stating that they would increase productivity, reduce labor turnover, and ensure fair competition for law-abiding contractors (CEA, 2022; Gaffney & Brink, 2022; Giamberardino, 2022).

Problems with Using OEWS and NCS Data for Prevailing Wage Determinations

Despite the academic consensus which shows that prevailing wage laws lead to enhanced productivity, higher wages for construction workers, and more work for in-state contractors, the Congressional Budget Office (CBO) periodically includes repealing the Davis-Bacon Act as an option for reducing the federal deficit among a list of "smaller reductions" (CBO, 2024; CBO, 2022; CBO, 2018). A recent report suggests that the federal government could reduce costs by $24.7 billion over a 10-year period from 2025 through 2034, or about $2.5 billion per year (CBO, 2024). To put that in context, in fiscal year 2023, the federal government spent $112 billion on transportation infrastructure, which accounts for "about half" of all federal-funded or federally-assisted construction (Mallett, 2025; CBO, 2022). This means that the CBO assumes that repeal of the Davis-Bacon Act would only reduce the cost of federal construction projects by about 1 percent.[1] In fact, in 2018, Congressional Budget Office itself previously recognized that "repealing the Davis-Bacon Act would reduce total federal spending on construction by 0.9 percent" (CBO, 2018). Furthermore, the projected $2.5 billion estimate would only represent 0.1 percent of the $2 trillion federal deficit (CBO, 2026).

There are two problems with the Congressional Budget Office's estimates. First, the vast majority—0.8 percentage points out of 0.9 percent, according to their 2018 analysis—"would result from a reduction in wages and benefits" (CBO, 2018). This simplistic "wage differential" approach has been widely discredited amongst economists and academics, who have noted that savings "predicted" by those employing the wage differential method have never occurred in reality (Duncan & Ormiston, 2018; Duncan, 2016). The preponderance of economic research, especially that which uses project data, consistently and overwhelmingly concludes that prevailing wage laws have no net effect on total construction costs (Duncan, 2024; Manzo, Bruno, & Petrucci, 2023).[2] Second, these purported savings fail to take into account the downstream effects of repeal, such as reduced investments in registered apprenticeship training, higher on-the-job injury rates, increased materials and fuels costs, and greater expenditures on social safety net programs like Supplemental Nutrition Assistance Program (SNAP) food stamps, Medicaid, and Earned Income Tax Credit (EITC) assistance

[1] Mathematically, -$2.5 billion ÷ ($112 billion ÷ ½) = -1.1 percent (Mallett, 2025; CBO, 2022).
[2] The CBO has previously acknowledged that "[s]ome research suggests that repealing prevailing wage laws by eliminating the act would not result in savings" (CBO, 2018)

(Bilginsoy, 2005; Li et al., 2019; Manzo, Lantsberg, & Duncan, 2016). The CBO's inclusion of repeal of the Davis-Bacon Act as a deficit-reduction option is not only unsubstantiated by peer-reviewed economic literature, but also represents a miscalculation that would have unintended consequences for construction workers, local business owners, and taxpayers in communities across the United States.

Others have proposed changes to weaken the Davis-Bacon Act instead of outright repeal. One proposed change has been to replace the current market-based system for ascertaining Davis-Bacon prevailing wages with a new methodology using data from the *Occupational Employment and Wage Statistics* (OEWS) and *National Compensation Survey* (NCS) produced by the Bureau of Labor Statistics (BLS). OEWS data would be used for the base wages of construction workers and, since OEWS offers no data on fringe benefits, accompanying NCS information would be used for benefits (e.g., see Sherk, 2017). This proposed change is based on the incorrect assumption that OEWS and NCS data would be better indicators of local construction market rates than Davis-Bacon surveys.

However, there are methodological flaws inherent in OEWS and NCS data that, if applied to prevailing wage determinations, would lead to substantial and widespread pay cuts for blue-collar construction workers in America.

OEWS wage rates exclude voluntary fringe benefits and NCS data on benefits is not localized. A critical deficiency of OEWS data is that it excludes voluntary fringe benefits (Philips & Duncan, 2015; Duncan, 2015b). This is a significant omission compared to Davis-Bacon prevailing wages, which explicitly include these benefits—from health insurance coverage to pension and retirement plan contributions to per-hour investments into registered apprenticeship training programs. These voluntary benefits are crucial components of a worker's total compensation package and are essential for attracting, retaining, and developing a skilled workforce in the inherently unstable and dangerous construction industry (Philips, 2022). The *National Compensation Survey* (NCS), which has been suggested to supplement OEWS data to add in benefits, is national in scope and only available for "a selected number of occupational groups" (BLS, 2026). Using NCS data would ignore differences in privately-negotiated benefits by region and by craft, distorting market rates and undermining construction standards in communities across the United States.

OEWS wage rates and NCS benefits overrepresent residential construction. Nearly half of OEWS wage information is derived from the residential construction sector (Philips & Duncan, 2015; Eisenbrey & Belman, 2013). This sector is generally a lower-skill, lower-wage, and lower-benefits segment of the construction industry. In contrast, federal public works covered by the Davis-Bacon Act are mostly on complex heavy, highway, and large building projects, where higher wages and more comprehensive benefits generally prevail. The overrepresentation of residential data severely skews OEWS wages and NCS benefits downward. Using them for wage determinations would lead to an artificial deflation of wages and fringe benefits for skilled workers employed on covered projects because prevailing wages would no longer be based on comparable pay on similar projects in the communities where infrastructure is to be built.

Neither OEWS nor NCS distinguish between journeyworkers and apprentices. OEWS and NCS do not differentiate between experienced journeyworkers and registered apprentices (Philips & Duncan, 2015; Eisenbrey & Belman, 2013). Apprenticeship programs are structured such that workers earn lower wages for established periods in exchange for class-based instruction and on-the-job training. As they progress through their programs and acquire new skills, apprentices earn higher hourly incomes. These graduated wage scales are typically tied to percentages of their journeyworker rates, and incentivize employers to hire apprentices who are more affordable on a per-hour basis than fully-trained craftworkers. Beginning apprentices often earn between one-third

and two-thirds of their journeyworker rates—usually 50 percent (Bruno & Manzo, 2025). Using OEWS, which combines these disparate wage rates, would artificially lower the average prevailing wage for skilled journeyworkers, undermining the market value of experience labor.

OEWS and NCS do not report data by local counties and do not survey construction worksites. They attribute all of a contractor's work to the employer's primary business address, regardless of where the construction work is performed. This means, for example, that a general contractor based in West Virginia that has projects in Virginia, Ohio, Pennsylvania, and the District of Columbia would have that work attributed to the West Virginia address. Furthermore, OEWS aggregates data at the Metropolitan Statistical Area (MSA) level and, for rural America, "Nonmetropolitan Area" (BLS, 2024). This broad cluster grouping can combine counties with distinct construction labor markets—or different collective bargaining agreements (CBAs) where they prevail—and treats all rural portions of a state as homogenous when they may be very diverse. Accordingly, using this methodology would fail to reflect local market wages.

OEWS produces rates based upon annual income "intervals" or ranges. Davis-Bacon prevailing wages are based on surveys of private contractors who report the hourly wage and fringe benefits paid to workers on projects performed in the local county or area. By contrast, OEWS does not necessarily collect the exact wage paid (Groshen, 2013a). The form allows employers to report worker earnings by annual income band rather than precise hourly wage rates derived directly from payroll data (BLS, 2024). For example, for May 2024, "Range G" was $68,120–$87,359. If a construction worker earned $50 per hour but only worked 1,500 hours, his or her employer could select this income interval since he earned $75,000. The BLS, however, would not know that he or she earned $75,000; only that he or she earned between $68,120 and $87,359. The BLS would divide his or her income by an "annualized" 2,080-hour year, and also assume he or she falls within a $32.75–$41.99 per hour interval. This methodology can clearly artificially deflate earnings because construction workers typically do not work 40 hours each week over 52 weeks due to the seasonal and cyclical nature of the industry.

OEWS does not reflect wage rates actually paid to workers in their communities. While OEWS data do provide averages and quartiles of the wage distribution, they do not provide the mode—or the "wage that most workers are paid" in a construction market (Groshen, 2013a). The USDOL's current "three-step" method increases the likelihood that the prevailing wage will reflect an actual wage rate paid to workers in their communities, as opposed to an artificial weighted average paid to no one. Under the "three-step" rule, the prevailing wage is the same wage rate paid to a majority of workers in a job classification. If no single wage is paid to a majority of workers, any single wage paid to the greatest number of workers is deemed the prevailing wage. If, however, no single wage is paid to at least 30 percent of workers, then the weighted average of all wages paid is deemed the prevailing wage. A weighted average is only used as a last resort in the "three-step" Davis-Bacon rule.

OEWS data is often based on small sample sizes relative to the number of construction occupations and local construction markets. Some OEWS wages are "based on responses from only a handful of employers… or require suppression of the data to protect the confidentiality of individual respondents" (Groshen, 2013a). Because sample sizes are small, the BLS has relied on responses that are up to three years old to increase statistical significance (Philips & Duncan, 2015). Furthermore, response rates to BLS surveys have been rapidly declining over recent years due to various factors, such as difficulty in reaching certain demographic groups, fewer individuals responding to surveys conducted over phone or by mail, and overall mistrust of surveys for political reasons (BLS, 2023; Feldman & Mendez, 2022). This means that OEWS wages would lag actual local market-clearing rates and may increasingly depend on older data and statistical imputations, rather than on industry-specific surveys.

OEWS and NCS data are not transparent. The underlying OEWS wage data is not available to the public and it cannot be challenged for reliability or correctness. The NCS benefits microdata is only "available on a limited basis to researchers for the purpose of conducting valid statistical analyses" and is not available to industry stakeholders (BLS, 2026). While the wage survey process encourages and accepts data from all available sources, stakeholder participation is restricted under OEWS.

For these reasons, a Commissioner of the Bureau of Labor Statistics (BLS) has definitively concluded that *Occupational Employment and Wage Statistics* (OEWS) and *National Compensation Survey* (NCS) are not intended for or suitable for Davis-Bacon prevailing wages.

> *"BLS has no role in establishing prevailing wages or determining what data are appropriate for that purpose. … Because the BLS data are used for so many purposes, we generally don't design them for particular applications, such as the Davis-Bacon wage determinations"* (Groshen, 2013b).

The Potential Impact of Using OEWS and NCS Data for Prevailing Wage Determinations

The Davis-Bacon Act and Related Acts collectively apply to $217 billion in federal and federally-assisted construction spending per year and cover an estimated 1.2 million blue-collar construction workers across the United States (WHD, 2023). Switching to OEWS wages and NCS benefits would seriously erode the prevailing wages paid to these workers. Figures 1 and 2 provide two hypothetical examples on the potential impact of discarding Davis-Bacon surveys and instead using estimates from BLS datasets, which are not intended to be used to determine prevailing wage rates.

Figure 1 looks at the six largest construction trades—carpenters, electricians, laborers, operating engineers, plumbers, and painters—in three urban areas across five electorally important U.S. states. The five states are Michigan, Pennsylvania, Wisconsin, Georgia, and Nevada. For simplicity, the comparisons are all for job classifications in the "building" construction sector. The average OEWS wage in the three largest metropolitan statistical areas (MSAs), and calculated NCS benefits rate based on the national average voluntary benefits amount as a share of total compensation for the occupational grouping that includes construction workers, is compared with the Davis-Bacon base wage and fringe benefits rates for the job classification for the county with the largest (or core) city in the MSA. In total, the analysis includes 90 observations.

FIGURE 1: CASE STUDY ON THE IMPACT OF SWITCHING FROM DAVIS-BACON SURVEYS TO OEWS AND NCS ON WAGE AND BENEFITS RATES, SIX LARGEST TRADES IN THREE URBAN AREAS IN FIVE SWING STATES, MAY 2024 ESTIMATES

State and Trade	Largest MSA	County in MSA	Davis-Bacon		OEWS/NCS		OEWS/NCS Difference		
			Wage	Benefits	Wage	Benefits	Wage	Benefits	Total
Five-State, Three-County Analysis	**Average**	**Average**	**$39.32**	**$20.89**	**$30.32**	**$7.34**	**-22.9%**	**-64.9%**	**-37.5%**
	Median	**Median**	**$38.30**	**$22.05**	**$30.31**	**$7.34**	**-21.7%**	**-66.7%**	**-39.0%**
Michigan	Michigan	Michigan							
Carpenter	Detroit	Wayne	$41.11	$30.23	$31.70	$7.68	-22.9%	-74.6%	-44.8%
Electrician	Detroit	Wayne	$51.32	$28.54	$36.41	$8.82	-29.1%	-69.1%	-43.4%
Laborer	Detroit	Wayne	$35.34	$17.75	$26.26	$6.36	-25.7%	-64.2%	-38.6%
Operating Engineer	Detroit	Wayne	$45.52	$25.35	$32.56	$7.89	-28.5%	-68.9%	-42.9%
Painter	Detroit	Wayne	$36.69	$32.74	$36.88	$8.93	+0.5%	-72.7%	-34.0%
Plumber	Detroit	Wayne	$32.85	$20.41	$27.34	$6.62	-16.8%	-67.6%	-36.2%

Carpenter	Flint	Genesee	$33.71	$23.19	$28.87	$6.99	-14.4%	-69.8%	-37.0%
Electrician	Flint	Genesee	$33.42	$20.67	$35.09	$8.50	+5.0%	-58.9%	-19.4%
Laborer	Flint	Genesee	$28.41	$15.70	$25.37	$6.15	-10.7%	-60.9%	-28.6%
Operating Engineer	Flint	Genesee	$39.57	$25.25	$31.68	$7.67	-19.9%	-69.6%	-39.3%
Painter	Flint	Genesee	$42.21	$22.35	$36.23	$8.78	-14.2%	-60.7%	-30.3%
Plumber	Flint	Genesee	$31.01	$17.29	$27.87	$6.75	-10.1%	-61.0%	-28.3%
Carpenter	Lansing	Ingham	$33.51	$21.06	$29.28	$7.09	-12.6%	-66.3%	-33.3%
Electrician	Lansing	Ingham	$36.90	$25.19	$33.85	$8.20	-8.3%	-67.4%	-32.3%
Laborer	Lansing	Ingham	$33.58	$13.45	$25.00	$6.06	-25.6%	-55.0%	-34.0%
Operating Engineer	Lansing	Ingham	$39.57	$25.25	$32.51	$7.87	-17.8%	-68.8%	-37.7%
Painter	Lansing	Ingham	$44.79	$25.43	$35.02	$8.48	-21.8%	-66.6%	-38.0%
Plumber	Lansing	Ingham	$29.68	$20.40	$26.65	$6.46	-10.2%	-68.4%	-33.9%
Pennsylvania	Pennsylvania	Pennsylvania							
Carpenter	Philadelphia	Philadelphia	$54.13	$29.78	$32.62	$7.90	-39.7%	-73.5%	-51.7%
Electrician	Philadelphia	Philadelphia	$65.76	$42.09	$38.14	$9.24	-42.0%	-78.1%	-56.1%
Laborer	Philadelphia	Philadelphia	$37.70	$26.54	$28.19	$6.83	-25.2%	-74.3%	-45.5%
Operating Engineer	Philadelphia	Philadelphia	$49.03	$32.37	$35.63	$8.63	-27.3%	-73.3%	-45.6%
Painter	Philadelphia	Philadelphia	$64.73	$37.21	$38.73	$9.38	-40.2%	-74.8%	-52.8%
Plumber	Philadelphia	Philadelphia	$41.24	$28.10	$27.12	$6.57	-34.2%	-76.6%	-51.4%
Carpenter	Pittsburgh	Allegheny	$38.92	$20.06	$31.17	$7.55	-19.9%	-62.4%	-34.4%
Electrician	Pittsburgh	Allegheny	$50.86	$31.78	$34.21	$8.29	-32.7%	-73.9%	-48.6%
Laborer	Pittsburgh	Allegheny	$22.37	$17.60	$25.51	$6.18	14.0%	-64.9%	-20.7%
Operating Engineer	Pittsburgh	Allegheny	$35.62	$24.05	$30.31	$7.34	-14.9%	-69.5%	-36.9%
Painter	Pittsburgh	Allegheny	$48.65	$25.47	$34.88	$8.45	-28.3%	-66.8%	-41.5%
Plumber	Pittsburgh	Allegheny	$30.56	$23.72	$25.20	$6.10	-17.5%	-74.3%	-42.3%
Carpenter	Harrisburg	Dauphin	$34.34	$19.69	$28.07	$6.80	-18.3%	-65.5%	-35.5%
Electrician	Harrisburg	Dauphin	$38.75	$26.68	$34.95	$8.47	-9.8%	-68.3%	-33.6%
Laborer	Harrisburg	Dauphin	$24.61	$17.18	$24.01	$5.82	-2.4%	-66.1%	-28.6%
Operating Engineer	Harrisburg	Dauphin	$37.10	$27.62	$28.57	$6.92	-23.0%	-74.9%	-45.2%
Painter	Harrisburg	Dauphin	$41.36	$29.45	$36.35	$8.80	-12.1%	-70.1%	-36.2%
Plumber	Harrisburg	Dauphin	$25.84	$16.30	$25.46	$6.17	-1.5%	-62.2%	-24.9%
Wisconsin	Wisconsin	Wisconsin							
Carpenter	Green Bay	Brown	$40.44	$28.85	$30.80	$7.46	-23.8%	-74.1%	-44.8%
Electrician	Green Bay	Brown	$40.25	$23.14	$33.62	$8.14	-16.5%	-64.8%	-34.1%
Laborer	Green Bay	Brown	$35.30	$19.45	$26.49	$6.42	-25.0%	-67.0%	-39.9%
Operating Engineer	Green Bay	Brown	$43.70	$27.14	$35.96	$8.71	-17.7%	-67.9%	-36.9%
Painter	Green Bay	Brown	$49.00	$21.84	$39.90	$9.66	-18.6%	-55.7%	-30.0%
Plumber	Green Bay	Brown	$36.35	$20.87	$24.79	$6.00	-31.8%	-71.2%	-46.2%
Carpenter	Madison	Dane	$38.86	$27.06	$32.44	$7.86	-16.5%	-71.0%	-38.9%
Electrician	Madison	Dane	$48.55	$25.91	$36.51	$8.84	-24.8%	-65.9%	-39.1%
Laborer	Madison	Dane	$36.35	$19.45	$27.12	$6.57	-25.4%	-66.2%	-39.6%
Operating Engineer	Madison	Dane	$43.70	$27.14	$37.59	$9.11	-14.0%	-66.5%	-34.1%
Painter	Madison	Dane	$58.12	$26.34	$42.99	$10.41	-26.0%	-60.5%	-36.8%
Plumber	Madison	Dane	$36.35	$20.87	$26.55	$6.43	-27.0%	-69.2%	-42.4%
Carpenter	Milwaukee	Milwaukee	$41.91	$29.72	$32.43	$7.86	-22.6%	-73.6%	-43.8%
Electrician	Milwaukee	Milwaukee	$49.48	$27.34	$35.83	$8.68	-27.6%	-68.3%	-42.1%
Laborer	Milwaukee	Milwaukee	$37.48	$22.25	$28.30	$6.86	-24.5%	-69.2%	-41.1%
Operating Engineer	Milwaukee	Milwaukee	$50.37	$27.60	$38.28	$9.27	-24.0%	-66.4%	-39.0%
Painter	Milwaukee	Milwaukee	$57.60	$26.90	$41.81	$10.13	-27.4%	-62.4%	-38.5%
Plumber	Milwaukee	Milwaukee	$40.99	$24.92	$25.63	$6.21	-37.5%	-75.1%	-51.7%
Georgia	Georgia	Georgia							
Carpenter	Atlanta	Fulton	$18.02	$0.00	$24.84	$6.02	+37.8%	--	+71.2%
Electrician	Atlanta	Fulton	$38.65	$12.75	$30.62	$7.42	-20.8%		-26.0%
Laborer	Atlanta	Fulton	$14.57	$0.00	$20.30	$4.92	+39.3%	--	+73.1%
Operating Engineer	Atlanta	Fulton	$31.65	$15.03	$24.10	$5.84	-23.9%	-61.2%	-35.9%
Painter	Atlanta	Fulton	$39.13	$13.31	$29.64	$7.18	-24.3%	-46.1%	-29.8%
Plumber	Atlanta	Fulton	$16.14	$0.00	$22.77	$5.52	+41.1%	--	+75.3%
Carpenter	Savannah	Chatham	$19.13	$0.30	$24.58	$5.95	+28.5%	+1,884.6%	+57.1%
Electrician	Savannah	Chatham	$31.70	$13.08	$28.43	$6.89	-10.3%	-47.4%	-21.1%
Laborer	Savannah	Chatham	$12.69	$0.58	$19.01	$4.60	+49.8%	+693.9%	+78.0%
Operating Engineer	Savannah	Chatham	$31.65	$15.03	$23.55	$5.70	-25.6%	-62.0%	-37.3%
Painter	Savannah	Chatham	$33.45	$17.55	$29.86	$7.23	-10.7%	-58.8%	-27.3%
Plumber	Savannah	Chatham	$16.14	$0.00	$22.58	$5.47	+39.9%	--	+73.8%
Carpenter	Gainesville	Hall	$21.06	$3.54	$23.22	$5.62	+10.3%	+58.9%	+17.3%
Electrician	Gainesville	Hall	$38.65	$12.75	$28.59	$6.93	-26.0%	-45.7%	-30.9%
Laborer	Gainesville	Hall	$14.62	$0.00	$18.91	$4.58	+29.3%	--	+60.7%
Operating Engineer	Gainesville	Hall	$31.65	$15.03	$22.11	$5.36	-30.1%	-64.4%	-41.2%

Painter	Gainesville	Hall	$39.13	$13.31	$27.01	$6.54	-31.0%	-50.8%	-36.0%
Plumber	Gainesville	Hall	$16.14	$0.00	$21.19	$5.13	+31.3%	--	+63.1%
Nevada	Nevada	Nevada							
Carpenter	Carson City	Carson City	$44.06	$17.36	$33.21	$8.04	-24.6%	-53.7%	-32.8%
Electrician	Carson City	Carson City	$48.50	$23.04	$36.84	$8.92	-24.0%	-61.3%	-36.0%
Laborer	Carson City	Carson City	$33.95	$16.30	$27.11	$6.57	-20.1%	-59.7%	-33.0%
Operating Engineer	Carson City	Carson City	$62.59	$33.85	$32.08	$7.77	-48.7%	-77.0%	-58.7%
Painter	Carson City	Carson City	$55.39	$20.46	$31.42	$7.61	-43.3%	-62.8%	-48.5%
Plumber	Carson City	Carson City	$36.87	$15.82	$30.30	$7.34	-17.8%	-53.6%	-28.6%
Carpenter	Las Vegas	Clark	$55.51	$20.47	$32.87	$7.96	-40.8%	-61.1%	-46.3%
Electrician	Las Vegas	Clark	$57.48	$24.39	$34.73	$8.41	-39.6%	-65.5%	-47.3%
Laborer	Las Vegas	Clark	$36.03	$32.76	$24.69	$5.98	-31.5%	-81.7%	-55.4%
Operating Engineer	Las Vegas	Clark	$62.59	$33.85	$35.83	$8.68	-42.8%	-74.4%	-53.8%
Painter	Las Vegas	Clark	$57.00	$26.30	$31.52	$7.63	-44.7%	-71.0%	-53.0%
Plumber	Las Vegas	Clark	$47.90	$23.89	$27.21	$6.59	-43.2%	-72.4%	-52.9%
Carpenter	Reno	Washoe	$44.06	$17.36	$32.80	$7.95	-25.6%	-54.2%	-33.7%
Electrician	Reno	Washoe	$48.50	$23.04	$32.97	$7.99	-32.0%	-65.3%	-42.8%
Laborer	Reno	Washoe	$33.95	$16.30	$27.64	$6.70	-18.6%	-58.9%	-31.7%
Operating Engineer	Reno	Washoe	$62.59	$33.85	$40.07	$9.71	-36.0%	-71.3%	-48.4%
Painter	Reno	Washoe	$55.39	$20.46	$34.61	$8.38	-37.5%	-59.0%	-43.3%
Plumber	Reno	Washoe	$36.87	$15.82	$26.51	$6.42	-28.1%	-59.4%	-37.5%

Sources: Davis-Bacon wage determinations for carpenters, electricians, laborers, operating engineers, painters, and plumbers in the building sector from SAM.Gov (2025); *Occupational Employment and Wage Statistics* for "construction and extraction occupations" in May 2024 and *National Compensation Survey* benefits for "natural resources, construction, and maintenance occupations" from the Bureau of Labor Statistics (BLS) (2025a; 2025b). The median SAM.Gov prevailing wage determination publication date was June 1, 2024, but did range from January 1, 2019 (building laborers in Allegheny County, PA) to March 3, 2025 (building electricians in Fulton County, GA).

The data reveals that switching to OEWS and NCS estimates would result in substantial pay cuts for blue-collar construction workers in electorally important states (Figure 1). On average, blue-collar construction worker wages would fall by about 23 percent, from about $39 per hour to about $30 per hour. Fringe benefits would be deeply slashed, from $21 per hour to just $7 per hour, representing a cut of 65 percent. The total prevailing wage package would decrease by 38 percent in these five swing states.

Figure 2 presents a similar comparison, but for just one trade—bulldozers in the "highway" construction sector—and in the largest MSA in all 50 U.S. states. Once again, average OEWS wages and calculated NCS benefits rates for construction workers are compared with Davis-Bacon base wages and fringe benefits for the counties with the largest (or core) city in the MSA in the given state. This 50-observation analysis finds that switching to OEWS and NCS estimates would decrease bulldozer wages by 6 percent and benefits by 50 percent, on average—leading to a 20 percent reduction in total hourly compensation (Figure 2).

FIGURE 2: CASE STUDY ON THE IMPACT OF SWITCHING FROM DAVIS-BACON SURVEYS TO OEWS AND NCS ON WAGE AND BENEFITS RATES, HIGHWAY BULLDOZERS IN URBAN AREAS IN 50 STATES, MAY 2024 ESTIMATES

State	Largest MSA	County in MSA	Davis-Bacon		OEWS/NCS		OEWS/NCS Difference		
			Wage	Benefits	Wage	Benefits	Wage	Benefits	Total
50-State, One-County Analysis	**Average** **Median**	**Average** **Median**	**$35.08** **$35.03**	**$15.97** **$16.15**	**$33.01** **$30.63**	**$7.99** **$7.42**	**-5.9%** **-12.6%**	**-50.0%** **-54.1%**	**-19.7%** **-29.1%**
Rhode Island	Providence	Providence	$42.43	$29.70	$36.23	$8.78	-14.6%	-70.5%	-37.6%
New York	New York	New York	$72.40	$38.00	$50.45	$12.22	-30.3%	-67.8%	-43.2%
Pennsylvania	Philadelphia	Philadelphia	$53.11	$33.58	$35.63	$8.63	-32.9%	-74.3%	-48.9%
Michigan	Detroit	Wayne	$42.56	$25.25	$32.56	$7.89	-23.5%	-68.8%	-40.4%
West Virginia	Charleston	Kanawha	$37.59	$20.30	$25.87	$6.27	-31.2%	-69.1%	-44.5%
Illinois	Chicago	Cook	$58.45	$49.20	$45.32	$10.98	-22.5%	-77.7%	-47.7%
Nevada	Las Vegas	Clark	$57.62	$34.00	$35.83	$8.68	-37.8%	-74.5%	-51.4%
Massachusetts	Boston	Middlesex	$57.40	$33.20	$40.10	$9.71	-30.1%	-70.7%	-45.0%
Idaho	Boise City,	Ada	$37.58	$16.10	$29.61	$7.17	-21.2%	-55.5%	-31.5%
Kentucky	Louisville	Jefferson	$40.05	$19.10	$30.94	$7.49	-22.7%	-60.8%	-35.0%
Kansas	Kansas City,	Johnson	$28.15	$11.65	$32.82	$7.95	+16.6%	-31.8%	+2.4%
Wisconsin	Milwaukee	Milwaukee	$44.77	$28.80	$38.28	$9.27	-14.5%	-67.8%	-35.4%

Connecticut	Bridgeport	Fairfield	$50.22	$29.80	$40.71	$9.86	-18.9%	-66.9%	-36.8%
Delaware	Wilmington	New Castle	$37.55	$16.19	$35.63	$8.63	-5.1%	-46.7%	-17.6%
California	Los Angeles	Los Angeles	$56.68	$32.80	$45.18	$10.94	-20.3%	-66.6%	-37.3%
Oregon	Portland	Multnomah	$53.60	$16.90	$39.58	$9.59	-26.2%	-43.3%	-30.3%
Hawaii	Honolulu	Honolulu	$56.84	$36.83	$47.72	$11.56	-16.0%	-68.6%	-36.7%
Indiana	Indianapolis	Marion	$40.55	$21.80	$35.78	$8.67	-11.8%	-60.2%	-28.7%
New Jersey	New York	Bergen	$56.97	$36.25	$50.45	$12.22	-11.4%	-66.3%	-32.8%
North Dakota	Fargo	Cass	$33.40	$21.90	$30.02	$7.27	-10.1%	-66.8%	-32.6%
Alaska	Anchorage	Anchorage	$47.74	$27.15	$37.73	$9.14	-21.0%	-66.3%	-37.4%
Utah	Salt Lake City	Salt Lake	$21.95	$6.81	$28.81	$6.98	+31.3%	+2.5%	+24.4%
Washington	Seattle	King	$57.27	$26.57	$44.94	$10.89	-21.5%	-59.0%	-33.4%
Ohio	Cleveland	Cuyahoga	$45.53	$16.41	$34.61	$8.38	-24.0%	-48.9%	-30.6%
Iowa	Des Moines	Polk	$35.50	$26.50	$32.14	$7.79	-9.5%	-70.6%	-35.6%
Arizona	Phoenix	Maricopa	$35.56	$18.12	$30.13	$7.30	-15.3%	-59.7%	-30.3%
Colorado	Denver	Denver	$26.90	$5.59	$29.88	$7.24	+11.1%	+29.5%	+14.2%
Maryland	Baltimore	Baltimore	$33.00	$13.55	$29.20	$7.07	-11.5%	-47.8%	-22.1%
Minnesota	Minneapolis	Hennepin	$44.67	$26.90	$39.53	$9.58	-11.5%	-64.4%	-31.4%
Montana	Billings	Yellowstone	$34.55	$12.77	$30.00	$7.27	-13.2%	-43.1%	-21.2%
New Hampshire	Manchester	Hillsborough	$25.97	$6.59	$31.54	$7.64	+21.4%	+15.9%	+20.3%
Nebraska	Omaha	Douglas	$20.21	$6.75	$28.61	$6.93	+41.6%	+2.7%	+31.8%
New Mexico	Albuquerque,	Bernalillo	$20.92	$3.62	$24.84	$6.02	+18.7%	+66.2%	+25.7%
Maine	Portland	Cumberland	$21.71	$5.67	$29.56	$7.16	+36.2%	+26.3%	+34.1%
Missouri	St. Louis	St. Louis	$43.46	$30.22	$36.95	$8.95	-15.0%	-70.4%	-37.7%
Wyoming	Cheyenne	Laramie	$23.92	$9.61	$26.94	$6.53	+12.6%	-32.1%	-0.2%
Arkansas	Little Rock	Pulaski	$18.09	$0.00	$22.39	$5.42	+23.8%	--	+53.8%
Florida	Miami	Miami-Dade	$20.89	$0.00	$42.55	$10.31	+103.7%	--	+153.0%
Georgia	Atlanta	Fulton	$24.68	$2.59	$24.10	$5.84	-2.4%	+125.4%	+9.8%
Virginia	Washington	Fairfax	$20.64	$0.00	$30.31	$7.34	+46.9%	--	+82.4%
North Carolina	Charlotte	Mecklenburg	$16.13	$0.00	$26.21	$6.35	+62.5%	--	+101.9%
South Dakota	Sioux Falls	Minnehaha	$26.07	$0.00	$28.16	$6.82	+8.0%	--	+34.2%
Louisiana	New Orleans	Orleans	$16.40	$0.00	$26.60	$6.44	+62.2%	--	+101.5%
Tennessee	Nashville	Davidson	$17.08	$0.00	$25.58	$6.20	+49.8%	--	+86.0%
Mississippi	Jackson	Hinds	$13.87	$0.00	$22.81	$5.53	+64.5%	--	+104.3%
Oklahoma	Oklahoma City	Oklahoma	$15.09	$0.00	$24.45	$5.92	+62.0%	--	+101.3%
Vermont	Burlington	Chittenden	$20.76	$1.96	$28.93	$7.01	+39.4%	+257.5%	+58.2%
South Carolina	Greenville	Greenville	$12.95	$0.00	$23.51	$5.69	+81.5%	--	+125.5%
Alabama	Birmingham	Jefferson	$19.41	$0.00	$24.86	$6.02	+28.1%	--	+59.1%
Texas	Dallas	Dallas	$15.18	$0.00	$25.72	$6.23	+69.4%	--	+110.5%

Sources: Davis-Bacon wage determinations for carpenters, electricians, laborers, operating engineers, painters, and plumbers in the building sector from SAM.Gov (2025); *Occupational Employment and Wage Statistics* for "construction and extraction occupations" in May 2024 and *National Compensation Survey* benefits for "natural resources, construction, and maintenance occupations" from the Bureau of Labor Statistics (BLS) (2025a; 2025b). The median SAM.Gov prevailing wage determination publication date was June 1, 2024, but did range from January 1, 2019 (building laborers in Allegheny County, PA) to March 3, 2025 (building electricians in Fulton County, GA).

Both case studies show how blue-collar construction workers would suffer a significant erosion in job quality from changing the methodology for determining Davis-Bacon prevailing wages. The negative differences across both wages and especially fringe benefits indicate that the problem would be pervasive, demonstrating the systemic unsuitability of OEWS and NCS data in setting prevailing wages. Adopting OEWS and NCS data would replace a precise, market-reflective survey process with estimates that are not designed or intended for wage determinations, undermining the very intent and effectiveness of the Davis-Bacon Act.

Conclusion

The Davis-Bacon Act upholds local labor market standards and ensures that competition among contractors for covered, taxpayer-supported projects is based on efficiency, quality, and project management rather than on the ability to reduce worker pay or worker training. It levels the playing field while increasing apprenticeship investments and ensuring that contractors have access to a skilled and safe domestic workforce. As a result, the Davis-Bacon Act provides pathways into the

middle-class for blue-collar workers and keeps them off government assistance programs, strengthens the economy, and provides great value to taxpayers.

The methodology for ascertaining Davis-Bacon prevailing wage and benefits rates is transparent, reliable, and robust—particularly following 2023 updates that modernized administrative procedures and enforcement mechanisms. However, some opponents of prevailing wages have argued for discarding Davis-Bacon surveys and replacing them with *Occupational Employment and Wage Statistics* (OEWS) wage and *National Compensation Survey* (NCS) benefits data—even though the Bureau of Labor Statistics (BLS), which produces these estimates, has noted that they are not intended for or useful for such purposes.

Switching to OEWS and NCS data for prevailing wage determinations would distort blue-collar construction worker compensation below area market standards and produce less local hiring. The OEWS and NCS datasets do not include localized fringe benefits information—such as health insurance, retirement, and training contributions—and do not distinguish between journeyworkers and apprentices. The datasets do not survey construction worksites and do not reflect actual wages paid to workers in their communities. They also overrepresent residential construction, produce rates based on income intervals, and utilize data that is up to three years old. With declining response rates, these estimates will increasingly rely on old data and statistical imputations—rather than on timely, industry-specific surveys. As a result, switching to OEWS and NCS data would cut construction worker pay by between 6 and 23 percent and slash their benefits by between 50 and 65 percent. Ultimately, OEWS and NCS data are not suitable for taxpayer-supported construction and would result in a failure to meet the Davis-Bacon Act's goal of sustaining local construction market standards.

Sources

Balistreri, Edward, Christine McDaniel, and Eina Vivian Wong. (2003). "An Estimation of U.S. Industry-Level Capital-Labor Substitution Elasticities: Support for Cobb-Douglas," *The North American Journal of Economics and Finance*, 14: 343-356.

Bilginsoy, Cihan. (2005). "Wage Regulation and Training: The Impact of State Prevailing Wage Laws on Apprenticeship," in Hamid Azari-Rad, Peter Philips and Mark J. Prus (eds.) *The Economics of Prevailing Wage Laws*, Aldershot, UK: Ashgate, 149-168.

Blankenau, William and Steven Cassou. (2011). "Industry Differences in the Elasticity of Substitution and Rate of Biased Technological Change between Skilled and Unskilled Labor," *Applied Economics*, 43: 3129-3142.

Bruno, Robert and Frank Manzo IV. (2025). *Living Wages in Registered Apprenticeship Programs: An Assessment by Industry, Demographics, State, and Labor Policy*. University of Illinois at Urbana-Champaign; Illinois Economic Policy Institute.

Bureau of Labor Statistics (BLS). (2026). "Employee Benefits: Questions and Answers." U.S. Department of Labor.

Bureau of Labor Statistics (BLS). (2025). (a). "Occupational Employment and Wage Statistics: May 2024 Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates." U.S. Department of Labor.

Bureau of Labor Statistics (BLS). (2025). (b). "Databases, Tables & Calculators by Subject: Pay & Benefits." U.S. Department of Labor.

Bureau of Labor Statistics (BLS). (2024). *Occupational Employment and Wage Statistics May 2024 Survey Methods*. U.S. Department of Labor.

Bureau of Labor Statistics (BLS). (2023). "What Is BLS Doing to Maintain Data Quality as Response Rates Decline?" U.S. Department of Labor.

Census. (2024). "Advanced Search." United States Census Bureau.

Congressional Budget Office (CBO). (2026). "Monthly Budget Review." In the November 2025 edition, the CBO writes "In fiscal year 2025, which ended on September 30, the federal budget deficit totaled $1.8 trillion."

Congressional Budget Office (CBO). (2024). "Repeal the Davis-Bacon Act." *Options for Reducing the Deficit: 2025 to 2034*.

Congressional Budget Office (CBO). (2022). "Repeal the Davis-Bacon Act." *Options for Reducing the Deficit: 2023 to 2032—Volume II: Smaller Reductions*.

Congressional Budget Office (CBO). (2018). "Repeal the Davis-Bacon Act." *Options for Reducing the Deficit: 2019 to 2028*.

Construction Employers of America (2022). "Public Comments on RIN 1235-AA40 – Updating the Davis-Bacon and Related Acts Regulation Notice of Proposed Rulemaking."

Dickson Quesada, Alison, Frank Manzo IV, Dale Belman, and Robert Bruno. (2013). *A Weakened State: The Economic and Social Impacts of Repeal of the Prevailing Wage Law in Illinois*. University of Illinois at Urbana-Champaign; Michigan State University.

Duncan, Kevin. (2024). *What the Research Tells Us About the Costs and Benefits of Prevailing Wage Laws in Colorado*. Colorado State University-Pueblo.

Duncan, Kevin. (2016). *The Wage Differential Method: Promising Construction Cost Savings with the Repeal or Weakening of Prevailing Wage Laws that Cannot be Delivered*. Colorado State University-Pueblo.

Duncan, Kevin. (2015). (a). "The Effect of Federal Davis-Bacon and Disadvantaged Business Enterprise Regulations on Highway Maintenance Costs," *Industrial and Labor Relations Review*, 68(1): 212-237.

Duncan, Kevin. (2015). (b). *Limitations with the use of Occupational Employment Statistics in the Determination of Prevailing Wage Rates in Vermont*. Colorado State University-Pueblo.

Duncan, Kevin. (2011). *Economic, Fiscal and Social Impacts of Prevailing Wage in San Jose, California*. Colorado State University-Pueblo; Working Partnerships USA.

Duncan, Kevin, Adam Case, and Frank Manzo IV. (2024). "Prevailing Wages, School Construction Costs, and Bids by Out-of-State Contractors: Evidence from the Minneapolis—Saint Paul Metropolitan Area," *Construction Management and Economics*, 42(8), 695-713.

Duncan, Kevin, Jill Gigstad, and Frank Manzo IV. (2022). "Prevailing Wage Repeal, Highway Construction Costs, and Bid Competition in Kentucky: A Difference-in-Differences and Fixed Effects Analysis," *Public Works Management & Policy*. OnlineFirst.

Duncan, Kevin and Alex Lantsberg. (2016). *Building the Golden State: The Economic Impacts of California's Prevailing Wage Policy.* Colorado State University-Pueblo; Smart Cities Prevail.

Duncan, Kevin and Alex Lantsberg. (2015). *How Weakening Wisconsin's Prevailing Wage Policy Would Affect Public Construction Costs and Economic Activity*. Colorado State University-Pueblo; Smart Cities Prevail.

Duncan, Kevin and Russell Ormiston. (2022) "Comment on Updating the Davis-Bacon and Related Acts Regulations (RIN 1235-AA40)." Colorado State University-Pueblo; Allegheny College.

Duncan, Kevin and Russell Ormiston. (2018). "What Does the Research Tell Us About Prevailing Wage Laws?" *Labor Studies Journal*, 44(2): 139-160.

Duncan, Kevin and Jeffrey Waddoups. (2020). "Unintended Consequences of Nevada's Ninety-Percent Prevailing Wage Rule," *Labor Studies Journal*, 45(2): 1-20.

Eisenbrey, Ross and Dale Belman. (2013). Testimony before the Subcommittee on Workforce Protection, U.S. House of Representatives. Economic Policy Institute.

Feldman, Sarah and Bernard Mendez. (2022). "Who Are The People Who Don't Respond To Polls?" *FiveThirtyEight*.

Gaffney, Jim and Tim Brink. (2022). "Updating the Davis-Bacon and Related Acts Regulations, 87 Federal Register 15698 *et seq*., March 18, 2022. RIN # 1235-AA40." Mechanical Contractors Association of America (MCAA).

Giamberardino, Mario. (2022) "Public Comments on RIN 1235-AA40 – Updating the Davis-Bacon and Related Acts Regulation Notice of Proposed Rulemaking." National Electrical Contractors Association (NECA).

Groshen, Erica. (2013). (a). "Statement of Erica L. Groshen, Commissioner, Bureau of Labor Statistics, U.S. Department of Labor before the Subcommittee on Workforce Protections, Committee on Education and the Workforce." U.S. Congress.

Groshen, Erica. (2013). (b). "Promoting the Accuracy and Accountability of the Davis-Bacon Act." Hearing before the Subcommittee on Workforce Protections, Committee on Education and the Workforce." U.S. Congress. June 18, 2013.

Hinkel, Matt. (2021). *The Effect of Prevailing Wage Laws on Informal Construction Employment*. Michigan State University.

Jordan, Lisa, Robert Bruno, Phil Schrader, and Tony Sindone. (2006). *An Evaluation of Prevailing Wage in Minnesota: Implementation, Comparability and Outcomes*. Brevard College; University of Illinois at Urbana-Champaign; University of Minnesota; Indiana University– South Bend.

Kelsay, Michael and Gabriel Pleites. (2022). "Respondent Statement to DOL Notice of Proposed Rulemaking on Updating Davis-Bacon and Related Acts Regulations (RIN 1235-AA40)." University of Missouri – Kansas City Kansas City; Escuela Superior de Economía y Negocios.

Kim, Jaewhan, Chang Kuo-Liang, and Peter Philips. (2012). "The Effect of Prevailing Wage Regulations on Contractor Bid Participation and Behavior: A Comparison of Palo Alto, California with Four Nearby Prevailing Wage Municipalities," *Industrial Relations*, 51(4): 874-891.

Li, Zhi, Chimedlkham Zorigtbaatar, Gabriel Pleites, Ari Fenn, and Peter Philips. (2019). "The Effect of Prevailing Wage Law Repeals and Enactments on Injuries and Disabilities in the Construction Industry," *Public Works Management & Policy*, 24(4): 1-17.

Mallett, William. (2025). *Infrastructure Investment and the Federal Government*. Congressional Research Service (CRS).

Manzo IV, Frank. (2021). "The Effect of 'Federal-Aid Swap' Programs and Davis-Bacon Prevailing Wages on Highway Construction Costs and Contractor Composition: Evidence from Iowa," *Labor Studies Journal*, 47(1): 75-98.

Manzo IV, Frank, Robert Bruno, and Larissa Petrucci. (2023). *The Economic Impact of Prevailing Wage Law Repeals on Construction Market Outcomes: Evidence from Repeals Between 2015 and 2018*. Illinois Economic Policy Institute; University of Illinois at Urbana-Champaign.

Manzo IV, Frank and Kevin Duncan. (2018). *An Examination of Minnesota's Prevailing Wage Law: Effects on Costs, Training, and Economic Development*. Midwest Economic Policy Institute; Colorado State University-Pueblo.

Manzo IV, Frank, Jill Gigstad, and Robert Bruno. (2020). *Prevailing Wage and the American Dream: Impacts on Homeownership, Housing Wealth, and Property Tax Revenues*. Illinois Economic Policy Institute; University of Illinois at Urbana-Champaign.

Manzo IV, Frank, Alex Lantsberg, and Kevin Duncan. (2016). *The Economic, Fiscal, and Social Impacts of State Prevailing Wage Laws: Choosing Between the High Road and the Low Road in the Construction Industry*. Illinois Economic Policy Institute; Smart Cities Prevail; Colorado State University-Pueblo.

Manzo IV, Frank, Larissa Petrucci, and Robert Bruno. (2022). *The Union Advantage During the Construction Labor Shortage: Evidence from Surveys of Associated General Contractors of America Member Firms*. Illinois Economic Policy Institute; University of Illinois at Urbana-Champaign.

Manzo, Jill. (2017). *The $5 Billion Cost of Construction Fatalities in the United States: A 50 State Comparison*. Midwest Economic Policy Institute.

McFadden, Michael, Sal Santosh, and Ronit Shetty. (2022). *Quantifying the Value of Union Labor in Construction Projects*. Independent Project Analysis.

Michigan Legislature. (2023). "Enrolled House Bill No. 4007." 102nd Legislature. State of Michigan.

Onsarigo, Lameck, Kevin Duncan, and Alan Atalah. (2020). "The Effect of Prevailing Wages on Building Costs, Bid Competition, and Bidder Behavior: Evidence from Ohio School Construction." *Construction Management and Economics*, 38(10): 1-17.

Philips, Peter. (2022). *How Should Davis-Bacon Surveys Be Conducted?* "Comments Responding to U.S. DOL's Notice of Proposed Rulemaking on Updating Davis-Bacon and Related Acts Regulations. (RIN 1235-AA40)" University of Utah.

Philips, Peter. (2015). *Prevailing Wages and the Free Market*. University of Utah.

Philips, Peter. (2014). *Kentucky's Prevailing Wage Law: An Economic Impact Analysis*. University of Utah.

Philips, Peter and David Blatter. (2017). *Two Roads Diverge: Hidden Costs of the Low Wage Approach to Construction*. University of Utah.

Philips, Peter and Kevin Duncan. (2015). *Problems with Using* Occupational Employment Statistics *in the Determination of Prevailing Wage Rates*. University of Utah; Colorado State University-Pueblo.

SAM.Gov. (2025). "Wage Determinations." U.S. General Services Administration.

Sherk, James. (2017). *Labor Department Can Create Jobs by Calculating Davis–Bacon Rates More Accurately*. The Heritage Foundation.

Wage and Hour Division (WHD). (2024). "Dollar Threshold Amount for Contract Coverage." U.S. Department of Labor.

Wage and Hour Division (WHD). (2023). "Final Rule: Updating the Davis-Bacon and Related Acts Regulations." U.S. Department of Labor.

Whittaker, William G. (2007). *The Davis-Bacon Act: Institutional Evolution and Public Policy*. Congressional Research Service.

Whittaker, William G. (2005). *Davis-Bacon Suspension and Its Legislative Aftermath*. Congressional Research Service.