

DRAFT

University of Iowa Campus

Disadvantaged Business Enterprise

(DBE) Program FFY 2025-2027

2025 Update

49 CFR PART 26

Prepared by:
Metropolitan Planning Organization of Johnson County
Transportation Planning Division

May 2025

Objectives/Policy Statement (26.1, 26.23)

The University of Iowa Cambus has established a Disadvantaged Business Enterprise (DBE) program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 26. The University of Iowa Cambus has received Federal financial assistance from the Department of Transportation — Federal Transit Administration, and as a condition of receiving this assistance, the University of Iowa Cambus has signed an assurance that it will comply with 49 CFR Part 26.

It is the policy of the University of Iowa Cambus to ensure that DBEs, as defined in part 26, have an equal opportunity to receive and participate in DOT-assisted contracts. It is also our policy:

1. To ensure nondiscrimination in the award and administration of DOT-assisted contracts;
2. To create a level playing field on which DBEs can compete fairly for DOT-assisted contracts;
3. To ensure that the DBE Program is narrowly tailored in accordance with applicable law;
4. To ensure that only firms that fully meet 49 CFR Part 26 eligibility standards are permitted to participate as DBEs;
5. To help remove barriers to the participation of DBEs in DOT-assisted contracts; and
6. To assist the development of firms that can compete successfully in the market place outside the DBE Program.

The University of Iowa Cambus Manager has been delegated as the DBE Liaison Officer. In that capacity, the Manager is responsible for implementing all aspects of the DBE program. Implementation of the DBE program is accorded the same priority as compliance with all other legal obligations incurred by the University of Iowa Cambus in its financial assistance agreements with the Department of Transportation.

The University of Iowa Cambus has disseminated this policy statement to all the components of our organization. The University of Iowa Cambus has made this statement available to DBE and non-DBE business communities that perform work for the University of Iowa Cambus on DOT-assisted contracts. This policy statement shall be published in a newspaper of general circulation in the community and through a press release.

Deborah Zumbach, Associate President and Director,
Business Services and Parking and Transportation

Date

Mia Brunelli, Cambus Manager

Date

SUBPART A - General Requirements

Objectives (26.1)

The objectives are found in the policy statement on the first page of this program.

Applicability (26.3)

The University of Iowa Cambus (Cambus) is the recipient of federal transit funds authorized by Titles I, III, V, and VI of ISTEA, Pub L. 102-240 or by Federal transit laws in Title 49, U.S. Code, or Titles I, II, and V of the Teas-21, Pub. L. 105-178.

Cambus, as a recipient of Federal Transit Administration (FTA) funds, administers the Disadvantaged Business Enterprise (DBE) program in compliance with all laws, regulations, Executive Orders and guidance.

Definitions of Terms (26.5)

Cambus has adopted the definitions contained in Section 26.5 for this program (49 CFR Part 26).

Non-discrimination Requirements (26.7)

Cambus will never exclude any person from participation in, deny any person the benefits of, or otherwise discriminate against anyone in connection with the award and performance of any contract covered by 49 CFR Part 26 on the basis of race, color, sex, or national origin.

In administering its DBE program, Cambus will not, directly or through contractual or other arrangements, use criteria or methods of administration that have the effect of defeating or substantially impairing accomplishment of the objectives of the DBE program with respect to individuals of a particular race, color, sex, or national origin.

Record Keeping Requirements (26.11)

Reporting to DOT (26.11b)

Cambus will report DBE participation on a semi-annual basis, using Department of Transportation (DOT) Uniform Report of DBE Commitments/Awards and Payments. These reports will reflect payments actually made to DBEs on DOT-assisted contracts.

Bidders List (26.11c)

Cambus will utilize the Iowa DOT Directory of Certified Disadvantaged Business Enterprises to create a bidders list. The Iowa DOT's directory consists of information about all DBE firms that are eligible to bid on DOT-assisted contracts.

The purpose of this list is to allow the use of the bidders list approach to calculate overall goals.

Assurances (26.13)

Federal Financial Assistance Agreement

Cambus has signed the following assurances, applicable to all DOT-assisted contracts and their administration:

Assurances (26.13a)

Cambus shall not discriminate on the basis of race, color, national origin, or sex in the award and performance of any DOT-assisted contract or in the administration of its DBE Program or the requirements of 49 CFR Part 26. The recipient shall take all necessary and reasonable steps under 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. The recipient's DBE Program, as required by 49 CFR part 26 and as approved by DOT, is incorporated by reference in this agreement. Implementation of this program is a legal obligation and failure to carry out its terms shall be treated as a violation of this agreement. Upon notification to Cambus of its failure to carry out its approved program, the Department may impose sanction as provided for under part 26 and may, in appropriate cases, refer the matter for enforcement under 18 U.S.C. 1001 and/or the Program Fraud Civil Remedies Act of 1986 (31 U.S.C. 3801 et seq.).

This language will appear in financial assistance agreements with sub-recipients.

Contract Assurances (26.13b)

Cambus will ensure that the following clause is placed in every DOT-assisted contract and subcontract:

The contractor, sub-recipient, or subcontractor shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR part 26 in the award and administration of DOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of this contract or such other remedy as the recipient deems appropriate.

SUBPART B — Administrative Requirements

DBE Program Updates (26.21)

Since Cambus has received a grant and anticipates use of \$250,000 or more in FTA planning, capital, and/or operating assistance in a federal fiscal year, it will continue to carry out this program until all funds from DOT financial assistance that are eligible for contracting have been expended. Cambus will provide updates to DOT representing significant changes in the program.

Policy Statement (26.23)

The Policy Statement can be found on the first page of this program.

DBE Liaison Officer (DBELO) (26.25)

We have designated the following individual as our DBE Liaison Officer:

Mia Brunelli, Cambus Manager
840 Evashevski Drive
Iowa City, IA 52242
Phone: (319) 335-8630
Email: mia-brunelli@uiowa.edu

In that capacity, the DBELO is responsible for implementing all aspects of the DBE program and ensuring that Cambus complies with all provisions of 49 CFR Part 26. The DBELO has direct, independent access to the Associate Vice President and Director, Business Services and Parking and Transportation, Deborah Zumbach, concerning DBE program matters. An organization chart displaying the DBELO's position in the organization is found in Attachment 1 to this program.

The DBELO is responsible for developing, implementing, and monitoring the DBE program in coordination with other appropriate officials. The DBELO has a staff of two to assist in the administration of the program. The DBELO will have the assistance of the University of Iowa staff and staff of the Metropolitan Planning Organization of Johnson County (MPOJC) — Transportation Planning Division to assist with the DBE program as needed. Duties and responsibilities include the following:

1. Gathers and reports statistical data and other information as required by FTA.
2. Reviews third party contracts and purchase requisitions for compliance with this program.
3. Ensures that bid notices and requests for proposals are available to DBEs in a timely manner.
4. Identifies contracts and procurements so that DBE goals are included in solicitations (both race-neutral methods and contract specific goals) and identifies ways to improve progress.
5. Analyzes Cambus' progress toward goal attainment and identifies ways to improve progress.
6. Participates in pre-bid meetings.
7. Advises the CEO/governing body on DBE matters and achievement.
8. Participates with the legal counsel to determine contractor compliance with good faith efforts.
9. Provides DBEs with Iowa DOT contacts for information and assistance in preparing bids, obtaining bonding and insurance.
10. Participates in DBE training seminars.
11. Refers potential DBEs to Iowa DOT, Office of Contracts for possible certification according to the criteria set by Iowa DOT and acts as liaison to the Uniform Certification Process in Iowa.
12. Provides outreach as needed to DBEs and community organizations to advise them of opportunities.
13. Maintains the Cambus updated directory (from Iowa DOT) on certified DBEs.

DBE Financial Institutions (26.27)

It is the policy of Cambus to investigate the full extent of services offered by financial institutions owned and controlled by socially and economically disadvantaged individuals in the community, to make reasonable efforts to use these institutions, and to encourage prime contractors on DOT-assisted contracts to make use of these institutions. Cambus has utilized the Iowa DOT Directory of Certified Disadvantaged Business Enterprises to locate DBE financial institutions and have found none exist in this listing as of 4/28/2025. Cambus has also utilized the Iowa Economic Development Authority's certified Targeted Small Business (TSB) program to search

for financial institutions firms and have found none exist in this listing as of 4/28/2025. Cambus will also re-evaluate the availability of DBE financial institutions at the beginning of each federal fiscal year.

Information on the availability, or lack thereof, of such institutions can be obtained from the DBE Liaison Officer.

Prompt Payment Mechanisms (26.29)

Prompt Payment mechanisms (26.29a)

Cambus will include the following clause in every US DOT-assisted construction contract:

The prime contractor agrees to pay each subcontractor under the prime contract for satisfactory performance of its contract no later than 30 days from the receipt of each payment the prime contractor receives from Cambus, unless otherwise specified in individual contract documents. Any delay or postponement of payment from the above referenced time frame may occur only for good cause following written approval of Cambus. This clause applies to both DBE and non-DBE subcontractors.

Progress Payments and Retainage: (26.29b)

The Owner will make partial progress payments to the Constructor not more than once a month on the basis of a certified estimate of the work performed and material satisfactorily stored, the value of which is substantiated by vendors' priced invoices, as set forth in the General Conditions of the Contract. The Owner will withhold five percent (5%) from each progress payment, after any applicable adjustment in accordance with this Agreement, until final payment, consistent with the provisions of Chapters 262 and 573 of the Code of Iowa.

The prime contractor agrees to return retainage payments to each subcontractor within 30 days after the subcontractor work is satisfactorily completed. Any delay or postponement of payment from the above referenced time frame may occur only for good cause following written approval of Cambus. This clause applies to both DBE and non-DBE subcontractors.

Monitoring and Enforcement (26.29d)

Cambus has established the following mechanisms to monitor and enforce that prompt payment and return of retainage is in fact occurring.

1. Requiring prime contractors (in sub-contracts in excess of \$10,000), to provide subcontractors with all contract provisions, including the prompt payment provision. Essentially, ensuring that subcontractors are knowledgeable of the prompt payment requirement.
2. Because our contract requires prompt payment by the prime contractor to the subcontractor, the subcontractor is entitled to prompt payment. Because subcontractors will be aware of this right, and it is in their greatest financial interest to assure that this right is respected, we believe it is reasonable to expect that subcontractors not receiving prompt payment will contact Cambus.
3. If Cambus is contacted by a subcontractor regarding possible violation of the prompt payment clause by the prime contractor, we will make inquiries to the prime contractor. Depending on the response from the prime contractor, Cambus may implement the sanctions/consequences listed in the section below.

If prompt payment is not made, then Cambus may enforce the following sanctions:

1. Requiring documentation of all payment to subcontractors for all previous payments from Cambus to the prime contractor before any future payments from Cambus to the prime contractor are made.
2. Termination of contract for Default. This termination clause is included in all DOT-assisted contracts.
3. Prohibiting prime contractor from bidding on any future Cambus contracts.

Attachment 3 lists the regulation, provisions, and contract remedies available to Cambus in the events of non-compliance with the DBE regulation by a participant in our procurement activities.

Directory (26.31)

Cambus will utilize the directory developed by the Iowa DOT that identifies all firms eligible to participate as DBEs. The DBE Directory lists the firm's name, address, phone number, fax number, email, website, and the type of work the firm has been certified to perform (NAICS Code) as a DBE. The Iowa DOT continually revises the Directory as changes in information are approved. Cambus will keep a current copy of the Directory available locally. In addition, the IDOT's DBE Directory may be found at <https://secure.iowadot.gov/DBE/Home/Index/>.

Overconcentration (26.33)

Cambus has not identified that overconcentration exists in the types of work that DBEs perform in the Iowa City Urbanized Area. The Cambus DBELO will, on a triannual basis, review the Iowa DOT Directory of Certified Disadvantaged Business Enterprises and the Iowa Economic Development Authority's Certified Targeted Small Business (TSB) program to identify overconcentration areas. If it is determined that DBE firms have an overconcentration in a particular type of work as to "unduly" burden the opportunity of non-DBE firms who participate in this type of work, then Cambus will consult with the concerned DOT operating administration.

Business Development Programs (26.35)

Cambus has not established a business development program. Cambus will reevaluate the need for such a program on the DBE goal setting schedule (every 3 years).

Monitoring and Enforcement Mechanisms (26.37)

Cambus will take the following monitoring and enforcement mechanisms to ensure compliance with 49 CFR Part 26:

1. Cambus will bring to the attention of the DOT any false, fraudulent, or dishonest conduct in connection with the program, so that DOT can take the steps (e.g., referral to the Department of Justice for criminal prosecution, referral to the DOT Inspector General, action under suspension and debarment or Program Fraud and Civil Penalties rules) provided in 26.109.
2. Cambus will consider similar action under its own legal authorities, including responsibility determinations in future contracts. Attachment 3 lists the regulation, provisions, and contract remedies available to us in the events of non-compliance with the DBE regulation by a participant in our procurement activities.

3. Cambus will monitor FTA-assisted contracts to ensure that work committed to DBEs (prime or subcontractor) when they are awarded, is actually performed by the DBE. Cambus will verify that the DBE is performing the work tasks identified in the bid through on-site verification and/or phone conversation with the DBE owner. Cambus will require contractors to provide documentation of payments (including retainage payments) to DBE and non-DBE firms with the date they are paid. Where feasible, Cambus will verify that the supplies utilized by the DBE are provided exclusively by the DBE or another third-party contractor (i.e. the supplies are not provided by the prime contractor).
4. Cambus will keep a running tally of actual payments to DBE firms for work committed to them at the time of contract award.

The contractor shall not perform any act, fail to perform any act, or refuse to comply with any Cambus requests which would cause Cambus to be in violation of the FTA terms and conditions of FTA Circular 4220.1F as amended.

Small Business Participation (26.39)

Small Business Definition:

1. Small Business — Small businesses must meet the definitions specified in the Small Business Act, Section 3, and the Small Business Administration regulations (13 CFR Part 121) and be certified as a targeted small business (TSB) by Iowa Economic Development .
2. Disadvantaged Business Enterprise — A for-profit small businesses that has been certified as a DBE by the Iowa DOT in accordance with 49 CFR Part 26. Only these firms will be counted towards DBE race-neutral participation on DOT-assisted contracts. This certification typically reviews the following criteria:
 - a. Business must be 51% owned by one/more individual who are socially/economically disadvantaged.
 - b. Management and daily business operations are controlled by the owner.

Small Business Certification/Verification Procedures:

Cambus will accept the following certifications for participation in the small business element of Cambus' DBE Program

1. Iowa DOT DBE Certification — DBE Certification by the Iowa DOT which stipulates that a firm has been determined to meet all the requirements in accordance with 49 CFR Part 26.
2. Iowa Economic Development Authority (IEDA)'s Targeted Small Business (TSB) program — Those certified under the IEDA's TSB program (<https://www.iowaeda.com/small-business/targeted-small-business/>) are available to the public by going to the TSB website and downloading applicable businesses within Iowa. TSB firms must be a for profit business, be located in Iowa, have a gross income of less than \$4.0 million over the past three years and be owned/operated/actively managed by a female, minority, service-disabled veteran or person with disability.
3. Small Business Administration (SBA) Certification that business is an SBA as defined under 13 CFR Part 121.

Small Business Element Strategies — Cambus' DBE Program is met through a mixture of race-conscious and race-neutral methods as identified in Cambus' triennial DBE Goal calculations. DBE firms are, by definition, small businesses. As part of its race-neutral element of the DBE program, Cambus will encourage small business participation in future contract opportunities through the following mechanisms:

1. **Unbundling Contracts to Foster Small Business Opportunities:** Cambus will encourage its prime contractors or prime consultants to unbundle contracts to facilitate participation by small businesses. Cambus staff will assist prime contractors or prime consultants in identifying portions of work which may be unbundled and performed by small businesses, as opposed to the prime contractor self-performing all the work involved. Cambus will provide opportunities for small businesses to network with larger firms on larger DOT-assisted contracts to discuss these smaller opportunities within each project.
2. **Outreach:** Cambus is committed to minimizing barriers to increase contract participation with small businesses. Therefore, to increase contracting opportunities with small businesses, Cambus may do the following:
 - a. Send bid announcements directly to small business firms.
 - b. Notify small businesses of upcoming bid opportunities through postings on its website and email blasts to known small businesses concerns (i.e. small business development centers), minority business associations and other community organizations.
 - c. Search known Small Business databases (Iowa DOT Iowa DBEs: (<https://secure.iowadot.gov/DBE/Home/Index/>) and the IEDA's Certified TSB website (<https://www.iowaeda.com/small-business/targeted-small-business/>) for small businesses that could perform work on not only DOT-assisted contracts but also on smaller contracting opportunities that are not DOT-assisted.
 - d. Notify any new vendor of the Iowa DOT DBE program by sending out the Iowa DOT's DBE and IEDA information to the new business to encourage participation, if applicable.
 - e. Conduct business opportunity meetings for larger projects with subcontracting opportunities to encourage networking between small businesses and large general contractors and explain the work types available that could be subcontracted out to small businesses.
 - f. Conduct pre-bid meetings for construction projects to help explain the project and answer questions.
 - g. Advertise all DOT-assisted contracting opportunities over \$50,000 through various outlets, including local newspapers, minority-based publications, and trade publications as well as on the Cambus website.
 - h. Cambus will keep records of registered prime contractors that request bidding documents.
3. **Implementation Schedule:** Cambus will implement the small business elements within contracting opportunities no later than nine months following FTA approval of the Cambus DBE Program. Cambus will reevaluate the need for a more detailed business development program on the DBE goal-setting schedule (every 3 years).

SUBPART C - Goals, Good Faith Efforts, and Counting

Quotas (26.43)

Cambus will not use quotas in any way in the administration of this DBE program.

Overall Goals (26.45)

A description of the methodology to calculate the overall goal and the goal calculations can be found in Attachment 4 to this program. This section of the program will be reviewed annually and updated as needed if circumstances have changed.

In accordance with section 26.45(f), Cambus will submit its overall DBE program and goal to FTA on August 1 of the year specified by FTA and every 3 years thereafter that Cambus has contracting opportunities over \$670,000. Cambus' goals are due August 1, 2025 and every three years thereafter.

To determine the overall DBE Goal for FFY 2025-2027, a two-step process was used. Step 1 used base figures to determine the relative availability of DBEs in specific areas of anticipated contracting opportunities, using the Iowa DOT State of Iowa Directory of Certified Disadvantaged Business Enterprises. In Step 2, an assessment of known relevant evidence available to Cambus, the data in the NAICS Codes was analyzed to determine what adjustments were needed. Cambus uses the majority of federal operating funds for wages and salaries and thus has not had very few contracting opportunities to gather DBE availability data. As a result, the goal was not adjusted for past DBE participation but was weighted for the portion of funds expected to go to respective NAICS codes. This will be Cambus' fifth DBE goal participation, meaning there is little previous DBE history.

Before establishing the overall goal each year, Cambus will consult with minority, women's and general contractor groups, community organizations and other officials/organizations to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and Cambus' efforts to establish a level playing field for the participation of DBEs.

Following the consultation, Cambus will publish a notice of the proposed overall goals, informing the public that the proposed goal and its rationale are available for inspection electronically on Cambus' website or during normal business hours at the MPOJC office for 15 days following the date of the notice, and informing the public that Cambus will accept comments on the goals for 15 days from the date of the notice. Cambus will publish the notice in The Iowa City Press Citizen newspaper and on the Cambus website. Cambus has not been successful in finding a local minority publication.

Cambus will begin using this overall goal on July 1, 2025, unless otherwise instructed by DOT. This goal will remain effective for the duration of the three-year period established and approved by FTA.

The methodology to calculate the overall DBE goal and the goal calculations can be found in Attachment 4.

Goal Setting and Accountability (26.47)

If the awards and commitments shown on Cambus' Uniform Report of Awards or Commitments and Payments at the end of any fiscal year are less than the overall goal applicable to that fiscal year, Cambus will identify any contracts for the next fiscal year and consider use of a contract goal (race conscious mean) to support meeting the overall 3 year goal.

Cambus will:

1. Analyze in detail the reason for the difference between the overall goal and the actual awards/commitments;
2. Establish specific steps and milestones to correct the problems identified in the analysis; and
3. Maintain records regarding the analysis and efforts made for three years.

Transit Vehicle Manufacturers (26.49)

Cambus will require each transit vehicle manufacturer (TVM), as a condition of being authorized to bid or propose on FTA-assisted transit vehicle procurements, to certify that it has complied with the requirements of this section. Alternatively, Cambus may, at its discretion and with FTA approval, establish project-specific goals for DBE participation in the procurement of transit vehicles in lieu of the TVM complying with this element of the program.

Race Neutral Means of Meeting Goal (26.51 a-c)

Cambus will meet the maximum feasible portion of its overall goal using race-neutral means of facilitating DBE participation. The breakout of estimated race-neutral and race-conscious participation can be found in Attachment 4 to this program. This section of the program will be updated every three years when the goal calculation is updated.

In order to focus on race neutral and race-conscious means, Cambus will:

1. Arrange pre-bid meeting to facilitate participation by DBEs and other small businesses and by making contracts more accessible to small businesses, by means such as those provided under § 26.39 of this program.
2. Provide technical assistance regarding current contract opportunities.
3. Provide information on contracting procedures and specific contract opportunities (e.g., ensuring the inclusion of DBEs, and other small businesses, on recipient mailing lists for bidder/offerors; ensuring the dissemination to bidder/offerors on prime contracts of lists of potential subcontractors; provision of information in languages other than English, if requested).
4. Ensure distribution of the DBE directory, through electronic means, to potential prime contractors.

Race Conscious Means of Meeting Goal & Contract Goals (26.51 d-g)

Cambus will use contract goals to meet any portion of the overall goal it does not project being able to meet using race-neutral means. Contract goals are established so that, over the period to which the overall goal applies, they will cumulatively result in meeting any portion of Cambus' overall goal that is not projected to be met through the use of race-neutral means.

Cambus will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. Cambus need not establish a contract goal on every such contract, and the size of contract goals will be adapted to the circumstances of each such contract (e.g. type and location of work, availability of DBEs to perform the particular type of work).

Cambus will express its contract goals as a percentage of the total amount of a DOT-assisted contract.

Good Faith Efforts Procedures (26.53)

Award of Contracts with a DBE Contract Goal (26.53a)

In those instances where a contract-specific DBE goal is included in a procurement/solicitation, Cambus will not award the contract to a bidder/offeror who does not either: 1) meet the contract goal with verified, countable DBE participation; or 2) documents it has made adequate good faith efforts to meet the DBE contract goal, even though it was unable to do so. It is the obligation of the bidder/offeror to demonstrate it has made sufficient good faith efforts prior to submission of its bid.

Demonstration of Good Faith Efforts (26.53a & c)

The obligation of the bidder/offeror is to make good faith efforts. The bidder/offeror can demonstrate that it has done so either by meeting the contract goal or documenting good faith efforts. Examples of good faith efforts are found in Appendix A to Part 26.

The following personnel are responsible for determining whether a bidder/offeror who has not met the contract goal has documented sufficient good faith efforts to be regarded as responsive:

- Cambus Manager/DBELO

Cambus will evaluate if any/all of the following good faith efforts were conducted by the bidder/offeror to achieve DBE participation on the project:

- A. Solicited the interest of all certified DBEs who have the capability to perform the work of the contract. The bidder/offeror must solicit this interest within sufficient time to allow the DBEs to respond to the solicitation. The bidder/offeror must determine with certainty if the DBEs are interested by taking appropriate steps to follow up initial solicitations. (Solicitations include attending pre-bid meetings, attending small business networking meetings, phone calls, emails, advertising, etc.).
- B. Selected portions of the work to be performed by DBEs in order to increase the likelihood that the DBE goals will be achieved. This includes, where appropriate, breaking out contract work items into economically feasible units to facilitate DBE participation, even when the prime contractor might otherwise prefer to perform these work items with its own forces.
- C. Provided interested DBEs with adequate information about the plans, specifications, and requirements of the contract in a timely manner to assist them in responding to a solicitation.
- D. (1) Negotiated in good faith with interested DBEs. It is the bidder/offeror's responsibility to make a portion of the work available to DBE subcontractors and suppliers and to select those portions of the work or material needs consistent with the available DBE subcontractors and suppliers, so as to facilitate DBE participation. Evidence of such negotiation includes the names, addresses, and telephone numbers of DBEs that were

considered; a description of the information provided regarding the plans and specifications for the work selected for subcontracting; and evidence as to why additional agreements could not be reached for DBEs to perform the work.

(2) A bidder/offeror using good business judgment would consider a number of factors in negotiating with subcontractors, including DBE subcontractors, and would take a firm's price and capabilities as well as contract goals into consideration. However, the fact that there may be some additional costs involved in finding and using DBEs is not in itself sufficient reason for a bidder/offeror's failure to meet the contract DBE goal, as long as such costs are reasonable. Also, the ability or desire of a prime contractor to perform the work of a contract with its own organization does not relieve the bidder/offeror of the responsibility to make good faith efforts. Prime contractors are not, however, required to accept higher quotes from DBEs if the price difference is excessive or unreasonable.

- E. Not rejecting DBEs as being unqualified without sound reasons based on a thorough investigation of their capabilities. The contractor's standing within its industry, membership in specific groups, organizations, or associations and political or social affiliations (for example union vs. non-union employee status) are not legitimate causes for the rejection or non-solicitation of bids in the contractor's efforts to meet the project goal.
- F. Made efforts to assist interested DBEs in obtaining bonding, lines of credit, or insurance as required by the recipient or contractor.
- G. Made efforts to assist interested DBEs in obtaining necessary equipment, supplies, materials, or related assistance or services.
- H. Effectively used the services of available minority/women community organizations; minority/women contractors' groups; local, state, and Federal minority/women business assistance offices; and other organizations as allowed on a case-by-case basis to provide assistance in the recruitment and placement of DBEs.

Cambus will ensure that all information is complete and accurate and adequately documents the bidder/offer's good faith efforts before committing to the performance of the contract by the bidder/offeror.

Information to be Submitted (26.53b)

Cambus treats bidders'/offers' compliance with good faith efforts requirements as a matter of responsiveness.

Each solicitation for which a contract goal has been established will require the bidders/offerors to submit the following information:

1. The names and addresses of DBE firms that will participate in the contract;
2. A description of the work that each DBE will perform;
3. The dollar amount of the participation of each DBE firm participating;
4. Written and signed documentation of commitment to use a DBE subcontractor whose participation it submits to meet a contract goal;
5. Written and signed confirmation from the DBE that it is participating in the contract as provided in the prime contractor's commitment; and
6. If the contract goal is not met, evidence of good faith efforts.

Administrative Reconsideration (26.53d)

Within 2 business days of being informed by Cambus that it is not responsive because it has not documented sufficient good faith efforts, a bidder/offeror may request administrative reconsideration. Bidder/offerors should make this request in writing to the following reconsideration team:

Mark Dunn, Contracts Director, Email: mark.dunn@dot.iowa.gov
Nicki Rainey, Civil Rights Administrator, Email: nikita.rainey@dot.iowa.gov
Ed Kasper, Assistant Contracts Engineer, Email: edward.kasper@dot.iowa.gov

Iowa DOT, Office of Contracts
800 Lincoln Way
Ames, Iowa 50010,
Phone: (515) 239-1414

Since the first determination of good faith effort is a comparison of the bidder/offeror's DBE commitment to the established goal and the second determination of good faith effort is a calculated value, the reconsideration officials play no role in the original determinations. The reconsideration officials will not have played any role in the original determination that the bidder/offeror did not document sufficient good faith efforts.

As part of this reconsideration, the bidder/offeror will have the opportunity to provide written documentation or arguments concerning the issue of whether it met the goal or made adequate good faith efforts to do so. The bidder/offeror will have the opportunity to meet in person with our reconsideration officials to discuss the issue of whether it made adequate good faith efforts to do so. We will send the bidder/offeror a written decision on reconsideration, explaining the basis for finding that the bidder/offeror did or did not meet the goal or make adequate good faith efforts to do so.

Documentation required will include the following:

- Offering assistance in areas of interpreting plans, preparing proposals;
- Response to requests from any small businesses submitting quotes, concerning quantities, overtime, project scheduling, etc.;
- The bidder/offeror's past good faith efforts on the other projects bid with the Iowa DOT;
- Making portions of the work available for DBE subcontracting;
- Evidence of negotiations with DBE firms;
- DBE quotes obtained and non-DBE quotes used;
- Reason agreements were not reached;
- Follow-up after initial solicitations;
- Efforts to assist in obtaining bonding, lines of credit, or insurance; and
- Efforts to assist in obtaining equipment, supplies, and materials.

The result of the reconsideration process is not administratively appealable to the DOT.

Good Faith Efforts When a DBE is Replaced on a Contract (26.53f&g)

Cambus requires that prime contractors not terminate a DBE subcontractor listed on a bid/contract without Cambus' prior written consent. Prior written consent will only be provided

where there is “good cause” for termination of the DBE firm, as established by Section 26.53f(3) of Title 49 Part 26.

Before transmitting to Cambus its request to terminate, the prime contractor must give notice in writing to the DBE of its intent to do so. A copy of the notice must be provided to Cambus prior to consideration of the request to terminate. The DBE will then have five (5) days to respond and advise Cambus of why it objects to the proposed termination.

In those instances where “good cause” exists to terminate a DBE’s subcontract, Cambus will require the prime contractor to make good faith efforts to replace a DBE that is terminated or has otherwise failed to complete its work on a contract with another certified DBE. In this situation, Cambus will require the prime contractor to obtain our prior approval of the substitute DBE and to provide copies of new or amended subcontracts, or documentation of good faith efforts.

If the contractor fails or refuses to comply in the time specified, Cambus’ contracting office will issue an order stopping all or part of payment/work until satisfactory action has been taken. If the contractor still fails to comply, the contracting officer may issue a termination for default proceeding.

Sample bid Specification:

The requirements of 49 CFR Part 26, regulations of the U.S. Department of Transportation, apply to this contract. It is the policy of the University of Iowa Cambus to practice nondiscrimination based on race, color, sex, or national origin in the award or performance of this contract. All firms qualifying under this solicitation are encouraged to submit bids/proposals. Award of this contract will be conditioned upon satisfying the requirements of this bid specification. These requirements apply to all bidders/offerors, including those who qualify as a DBE. A DBE contract goal of ____ percent has been established for this contract. The bidder/offeror shall make good faith efforts, as defined in Appendix A, 49 CFR Part 26, to meet the contract goal for DBE participation in the performance of this contract.

The bidder/offeror will be required to submit the following information: 1) the names and addresses of DBE firms that will participate in the contract; 2) a description of the work that each DBE firm will perform; 3) the dollar amount of the participation of each DBE firm participating; 4) written documentation of the bidder/offeror’s commitment to use a DBE subcontractor whose participation it submits to meet the contract goal; 5) written confirmation from the DBE that it is participating in the contract as provided in the commitment made under (4); and (6) if the contract goal is not met, evidence of good faith efforts.

Counting DBE Participation (26.55)

Cambus will count DBE participation toward overall and contract goals as provided in 49 CFR 26.55 and will take reasonable steps to ensure contractors provide CAMBUS with accurate information for counting. Cambus will report data to FTA on a semi-annual basis.

Subpart D — Certification Standards

Certification Process (26.61 – 26.73)

The Iowa DOT certifies all DBEs in Iowa, Cambus does not certify DBEs. For information about eligibility standards, the certification process, or to apply for certification, firms should contact the Iowa DOT:

Yareli Mendoza, DBE External Administrator
Email: yareli.mendoza@iowadot.us
Phone: 515-239-1427

Iowa DOT's certification application forms and documentation requirements are found on the Iowa DOT website here: <https://iowadot.gov/civilrights/Disadvantaged-business-enterprise-program-DBE/DBE-Program> and paper copies can be provided by reaching out to the CAMBUS's DBE Liaison.

See 29.39 for TSB certification information.

Subpart E — Certification Procedures

Unified Certification Programs (26.81)

Cambus is a member of a Unified Certification Program (UCP) administered by the Iowa DOT. The UCP will meet the requirements of this section. Cambus will use and count for DBE credit only those DBE firms certified by the Iowa DOT. Refer to Subpart D for information on how to become a certified DBE.

The Iowa DOT's DBE UCP Directory may be found at <https://secure.iowadot.gov/DBE/directory>.

Cambus will work with businesses that may qualify as Iowa DBEs but are not yet listed as a "certified" Iowa DBE, to forward paperwork from other states to the Iowa DOT's Office of Contracts. Facilitating this paperwork sharing may enable Cambus to contract with more DBE firms with minimal work on behalf of the small business. One opportunity to target small businesses that are potential DBEs would be to encourage Iowa's TSB businesses that Cambus works with (<https://dia.iowa.gov/tsb/index.php/home>) to apply for DBE certification.

The Cambus DBELO will work on an annual outreach effort in this regard.

Procedures for Certification Decisions (26.83 a & c)

Certification Appeals (26.89)

Cambus relies on the Iowa DOT to appropriately administer the DBE certification program.

A firm who has been denied certification as a DBE by the Iowa DOT or whose certification has been removed, will be provided an opportunity to appeal the decision to the Iowa DOT DBE appeal committee. Please contact the Iowa DOT's Office of Contracts, EEO section, at 515-239-1414 or via email dot.contracts@iowadot.us for more information regarding this appeal process.

Any firm or complainant may also appeal the Iowa DOT's decision at any time in a certification matter to the DOT. Such appeals may be sent to:

U.S. Department of Transportation
Departmental Office of Civil Rights
External Civil Rights Program
1200 New Jersey Avenue SE
Washington, D.C. 20590
Phone: (202) 366-4648

It is Cambus' understanding that the Iowa DOT will promptly implement any DOT certification appeal decision affecting the eligibility of DBEs for DOT-assisted contracts as identified in the Iowa DBE Program (<https://iowadot.gov/civilrights/documents/DBEProgram.pdf>). Cambus does not certify firms within the State of Iowa.

SUBPART F — Compliance and Enforcement

Information, Confidentiality, Cooperation (26.109)

Cambus will safeguard from disclosure to third parties information that may reasonably be regarded as confidential business information, consistent with federal, state, and local law. Notwithstanding any contrary provisions of state or local law, Cambus will not release personal financial information submitted by a DBE applicant to a third party (other than DOT) without the written consent of the submitter.

Monitoring Payments to DBEs

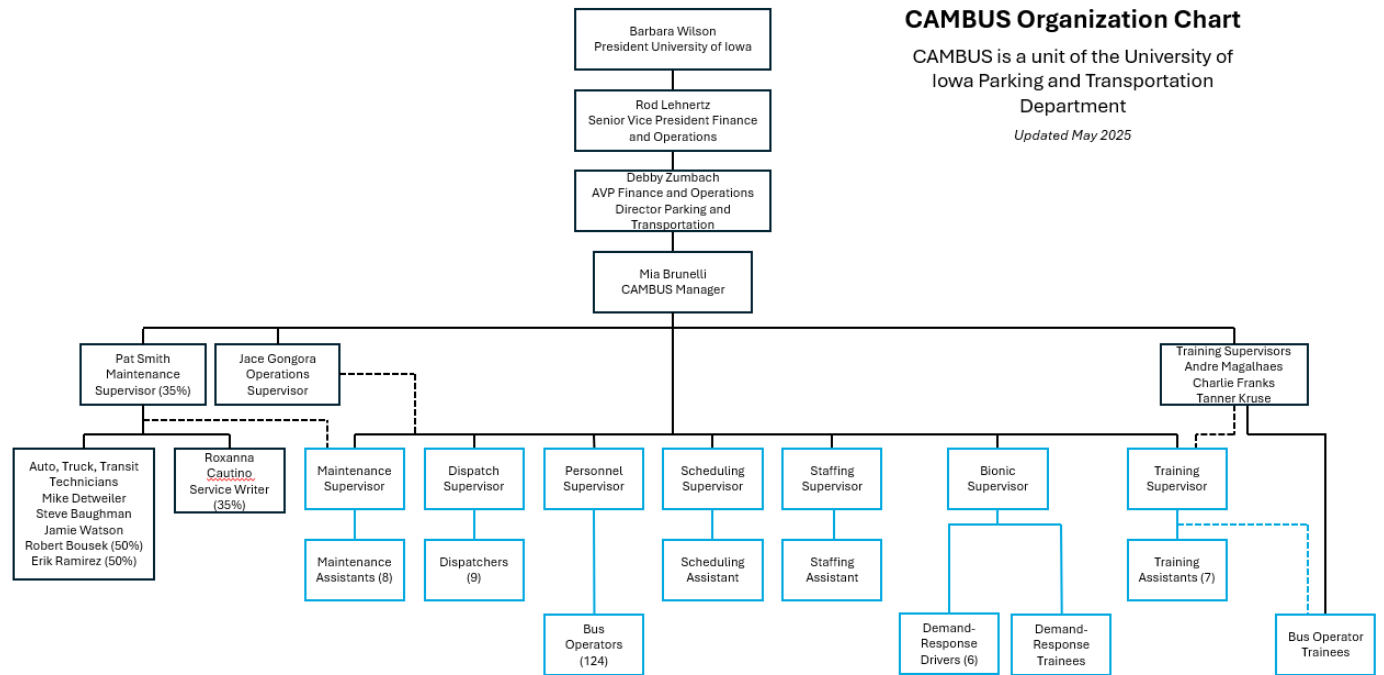
Cambus will require prime contractors to maintain records and documents of payments to DBEs for five years following the performance of the contract. These records will be made available for inspection upon request by any authorized representative of Cambus, Iowa DOT, or FTA. This reporting requirement also extends to any certified DBE subcontractor.

Cambus will perform interim audits of contract payments to DBEs. The audit will review payments to DBE subcontractors to ensure that the actual amount paid to DBE subcontractors equals or exceeds the dollar amounts stated in the schedule of DBE participation.

ATTACHMENTS

- Attachment 1 Organizational Chart
- Attachment 2 DBE Directory
- Attachment 3 Monitoring and Enforcement Mechanisms
- Attachment 4 Overall Goal Calculation
- Attachment 5 Breakout of Estimated Race-Neutral & Race-Conscious Participation
- Attachment 6 Form 1 & 2 for Demonstration of Good Faith Efforts

Attachment 1 – Organizational Chart



Note: The governing entity for the University of Iowa is the Iowa Board of Regents.

Note: The University of Iowa Cambus Manager is also the DBELO for Cambus

Attachment 2 — Iowa DOT Directory of Certified DBEs

Link - <https://secure.iowadot.gov/DBE/Home/Index/>

Any questions concerning this Directory or the DBE program should be directed to:

External Civil Rights Team
Iowa Department of Transportation
800 Lincoln Way
Ames, Iowa 50010
Phone: 515-239-1422 or 515-239-1304
Fax: 515-817-6502
Email: civil.rights@iowadot.us

Attachment 3 - Monitoring and Enforcement Mechanisms

Cambus has available several remedies to enforce the DBE requirements contained in its contracts, including, but not limited to, the following:

1. Breach of contract action, pursuant to the terms of the contract
2. Breach of contract action, pursuant to State Code

In addition, the federal government has available several enforcement mechanisms that it may apply to firms participating in the DBE problem, including but not limited to, the following:

1. Suspension or department proceedings pursuant to 49 CFR part 26
2. Enforcement action pursuant to 49 CFR part 31
3. Prosecution pursuant to 18 USC 1001

Cambus will bring to the attention of the US DOT any false, fraudulent, or dishonest conduct in connection with the DBE program so that the DOT can take the steps provided in 26.107. After notifying a contractor they are in violation, Cambus may withhold payment until such violation is corrected.

In addition, Cambus has available several remedies to enforce the DBE requirements contained in its contracts, including, but not limited to, the following:

1. The contractor shall not perform any act, fail to perform any act, or refuse to comply with any Cambus requests which would cause Cambus to be in violation of the FTA terms and conditions of FTA Circular 4220.1F as amended
2. Federally-required Clauses contained in all DOT-assisted contracts including but not limited to: Termination of Contract; Breaches and Dispute Resolution, etc.
3. Suspension or debarment proceedings pursuant to 49 CFR part 26
4. Enforcement action pursuant to 49 CFR part 31
5. Prosecution pursuant to 18 USC 1001

Attachment 4 – Overall Goal Calculation

Section 26.45: Overall Goal Calculation

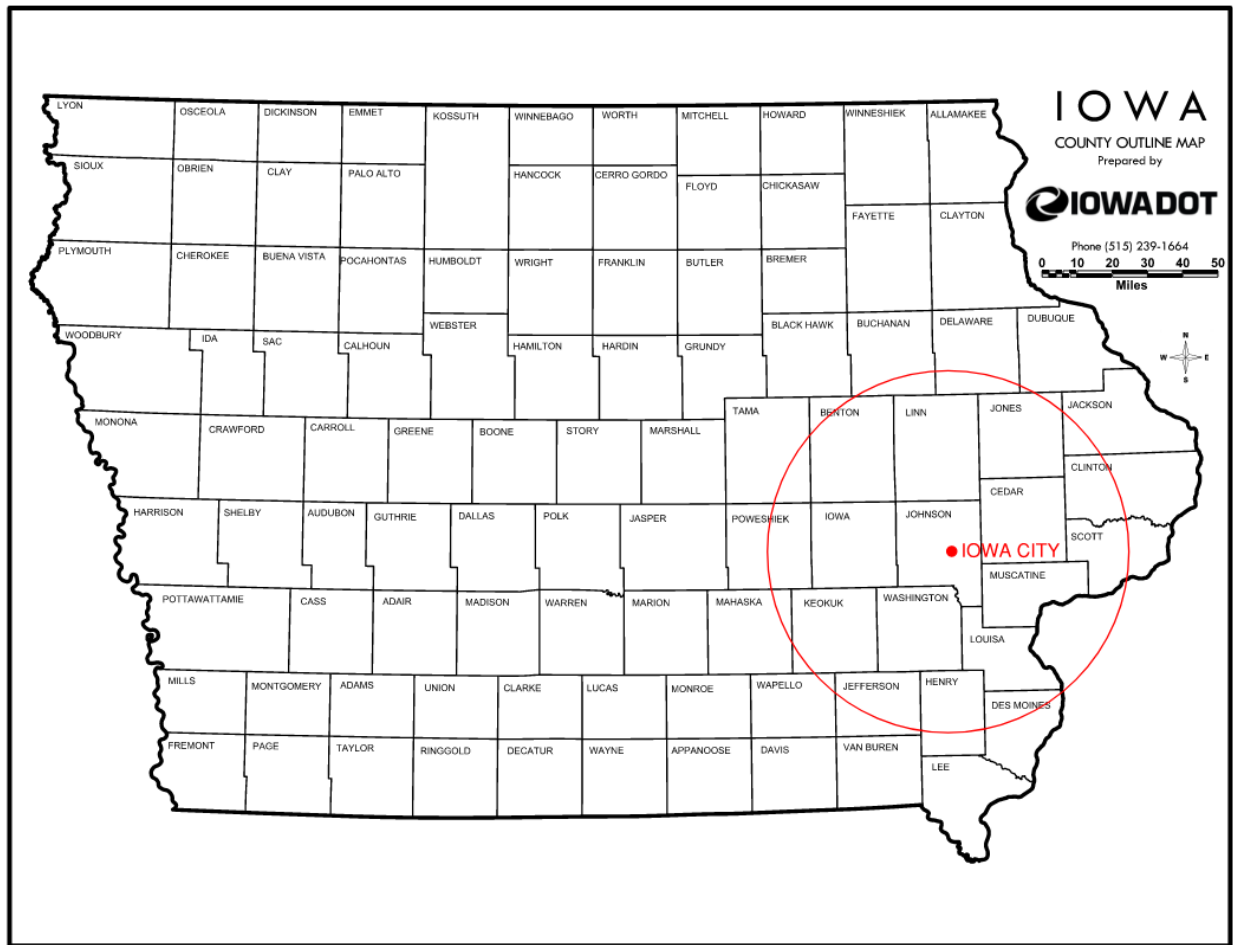
Amount of Goal

1. Cambus' overall goal for the FFY2025-FFY2027 time period is: 2.3% of the Federal Financial assistance we will expend in DOT-assisted contracts exclusive of FTA funds to be used for the purchase of transit vehicles.
2. \$460,000 is the dollar amount of DOT-assisted contracts that expects to award during FFY 2025 – FFY 2027. This means that Cambus has set a goal of expending \$350,000 with DBEs during this fiscal year/project.

Methodology Used to Calculate Overall Goal

The data sources used to derive the denominator were: 2017 NAICS Codes and the US Census (Table: All Sectors: County Business Patterns, including ZIP Code Business Patterns, by Legal Form of Organization and Employment Size Class for the U.S., States, and Selected Geographies: 2022). Given that the most significant contracting opportunity anticipated for FFY 2026-2027 is the construction and renovation of the existing transit facility, census data was limited to counties in Iowa within approximately 50 miles of Iowa City. Counties from which data was pulled include: Benton, Black Hawk, Buchanan, Cedar, Clinton, Delaware, Des Moines, Dubuque, Henry, Iowa, Jackson, Jefferson, Johnson, Jones, Keokuk, Linn, Louisa, Mahaska, Muscatine, Poweshiek, Scott, Tama, Wapello, and Washington County. While Blackhawk County technically falls outside of that radius, contractors from Waterloo and other Blackhawk Counties have performed work in Iowa City before and thus were included. While the transit facility is significant for the community of Iowa City, it is not anticipated to draw the attention of contractors outside of that approximate range.

The data source used to derive the numerator was the Iowa DOT DBE directory. DBE firms in the above listed counties were considered ready, willing and able to bid Cambus work.



Step 1: 26.45(c)

Determine the base figure for the relative availability of DBEs.

The base figure for the relative availability of DBEs was calculated as follows:

- Base figure = (Ready, willing, and able DBEs) / (All firms ready, willing, and able)
- Base figure = $6 / 2,268 = .0026$

Step 2: 26.45(d)

After calculating a base figure of the relative availability of DBEs, evidence was examined to determine what adjustment was needed to the base figure in order to arrive at the overall goal.

In order to reflect as accurately as possible the DBE participation expected in the absence of discrimination, the base figure has been increased by 2.04%.

This was done by weighting for portion of funding expected to be subcontracted to various groups. The reason behind adjusting the figure using this data was because the largest portion of funding will go to an area in which few firms are DBEs:

From this data, the base figure is adjusted to 2.3%.

Public Participation

Cambus held a pre-publish meeting on May 28, 2025 prior to the publication of the Preliminary CAMBUS Disadvantaged Business Enterprise (DBE) Program FFY 2025-2027: 2025 Update document. DBEs in the area were invited to a meeting to learn about and give input on the Cambus DBE Program before it was published for open public comment. The hybrid meeting was held in Conference Room 2520B University Capitol Centre, 201 S. Clinton Street, Iowa City, IA 52240 and via Zoom. Two DBEs were in attendance. Staff presented information regarding the Cambus DBE Program, Cambus' online bidding and RFQ solicitation platform, and where to find the published Program document, once available. There were no additional questions from the meeting participants.

Federal regulations require that Cambus publish a notice in general circulation media announcing Cambus' proposed overall goals for FFY 2025-2027 contracts assisted by the US DOT. Such notice informs the public that the proposed goals and their rationale are available for inspection during normal business hours at the MPOJC office for 30 days from the date of the notice. Cambus published its goal information in these publications: the Iowa City Press Citizen, the Cambus website, and the notice was also published on the Iowa DOT's Public Transit website.

Cambus received comments from these individuals or organizations: [include summary after conclusion of comment period].

Summaries of these comments are as follows: [include summary after conclusion of comment period]

Cambus' responses to these comments are: [include summary after conclusion of comment period].

Expected Federal Fund Expenditures (UI Cambus Facility)

FFY 25	No contracting opportunities		
FFY 26	Anticipate executing facility construction contracts	\$	5,596,892
FFY 27	Estimate the remaining construction contracts will be paid within period	\$	2,689,768
Total Expected Federal Fund Expenditures for FFY 25 - FFY 27		\$	8,286,660

NAICS Code and Meaning	Number of Establishments	DBE	Projected portion of FTA funds	% of Total DOT Funds (weight)	Relative Availability	Weighted Base Figure (Weight x Availability)
23811 // Poured concrete foundation and structure contractors	212	2	\$ 684,830	8.26%	0.94%	0.08%
23812 // Structural steel and precast concrete contractors	3	1	\$ 1,014,875	12.25%	33.33%	4.08%
23813 // Framing contractors	63	1	\$ 181,337	2.19%	1.59%	0.03%
23891 // Site preparation contractors	218	1	\$ 483,849	5.84%	0.46%	0.03%
23899 // All other specialty trade contractors	141	1	\$ 30,200	0.36%	0.71%	0.00%
	637	6	\$ 2,395,090			4.22%

Goal of Federal funds expended on DBEs

FFY25	\$	-
FFY26	\$	160,480
FFY27	\$	36,480
Total	\$	350,000

Attachment 5 – Breakout of Estimated Race-Neutral & Race-Conscious Participation

Cambus will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. Cambus uses the following race-neutral means to increase DBE participation: making efforts to assure that bidding and contract requirements facilitate participation by DBEs and other small businesses; considering making large contracts into smaller contracts to make them more accessible to small businesses, encouraging prime contracts to subcontract portions of the work that they might otherwise perform themselves; providing technical assistance, communications programs, and other support services to facilitate consideration of DBEs and other small businesses.

Additionally, Cambus will:

1. Arrange solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate participation by DBEs and other small businesses and by making contracts more accessible to small businesses, by means such as those provided under § 26.39 of this program.
2. Provide technical assistance regarding current contract opportunities.
3. Provide information on contracting procedures and specific contract opportunities (e.g., ensuring the inclusion of DBEs, and other small businesses, on recipient mailing lists for bidder/offers; ensuring the dissemination to bidder/offers on prime contracts of lists of potential subcontractors; provision of information in languages other than English, if requested).
4. Ensure distribution of the DBE directory, through electronic means, to potential prime contractors.

Cambus will use contract goals to meet any portion of the overall goal it does not project being able to meet using race-neutral means. Contract goals are established so that, over the period to which the overall goal applies, they will cumulatively result in meeting any portion of Cambus' overall goal that is not projected to be met through the use of race-neutral means.

Cambus will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. Cambus need not establish a contract goal on every such contract, and the size of contract goals will be adapted to the circumstances of each such contract (e.g. type and location of work, availability of DBEs to perform the particular type of work).

Cambus will express its contract goals as a percentage of the total amount of a DOT-assisted contract.

Cambus estimates that, in meeting its overall goal of 2.3%, it will obtain 100% from race-neutral participation and 0% through race-conscious measures for FFY 2025-2027.

The following is a summary of the basis of Cambus' estimated breakout of race-neutral and race-conscious DBE participation: Cambus has few contracting opportunities and for this period, does not have any contracts that are eligible for a contract goal.

In order to ensure that this DBE program will be narrowly tailored to overcome the effects of discrimination, if Cambus uses contract goals it will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual DBE participation (see

26.51(f)) and it will track and report race-neutral and race conscious participation separately. For reporting purposes, race-neutral DBE participation includes, but is not necessarily limited to, the following: DBE participation through a prime contract a DBE obtains through customary competitive procurement procedures; DBE participation through a subcontract on a prime contract that does not carry a DBE goal; DBE participation on a prime contract exceeding a contract goal; and DBE participation through a subcontract from a prime contractor that did not consider a firm's DBE status in making the award.

Cambus will maintain data separately on DBE achievements in those contracts with and without contract goals, respectively.

Attachment 6 – Form 1 & 2 for Demonstration of Good Faith Efforts

Contractor to provide Iowa DOT form 020113 and 102115 under sealed bid procedures as a matter of responsiveness for projects which carry a contract goal.

Contractor to provide Iowa DOT form 103115 under sealed bid procedures as a matter of responsiveness for projects which do not carry a contract goal.

Consultants or Contractors that are procured via a qualifications-based procedure for a project which does not carry a contract goal are to provide Iowa DOT form 102115 with the contract for their scope of services.

At completion of any project, Iowa FOT form 102116 is to be completed by contractor or consultant, Cambus will designate a Project Manager to monitor DBE participation on contracts.



DISADVANTAGED BUSINESS ENTERPRISE (DBE) INFORMATION STATEMENT OF DBE COMMITMENTS

(To be completed in ink by ALL bidders as per the current DBE specification.)
The submittal of this form with the signed proposal constitutes your DBE commitment.
The following work will be subcontracted to **certified** DBE firms.

Bid Order Number: _____

Letting Date: _____

County: _____

Proposal Identification Number: _____

Contractor: _____

1. DBE Firm* Date Contacted Person Contacted	2. Work or Items to be Sub-contracted	3. Submit Quote Yes/No	4. Use Quote Yes/no	5. Amount to DBE (Dollars)	6. DBE Supplier Yes/No	7. DBE Commitment (Dollars)
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	
Firm Date Contact		<input type="checkbox"/> No <input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> Yes		<input type="checkbox"/> No <input type="checkbox"/> Yes	

*For each DBE firm, **columns 1 (name of firm only), 4 and 5** must be completed to constitute a commitment to a DBE goal.
The total DBE participation dollar commitment will be based on 100 percent of the dollars in column 5, or 60 percent of the dollars in column 5 if column 6 is checked.

Distribution: One copy to be submitted with bid. One copy to the contractor.

**CERTIFICATION OF DISADVANTAGED
BUSINESS ENTERPRISE (DBE) PARTICIPATION**

The bidder must certify that it:

- A. Will meet the DBE goal for this project of _____ percent, or
- B. Will not meet the _____ percent goal, but has made good faith efforts to meet the goal consistent with 49 CFR Part 26 and as outlined in Category III, Section 23.

A. Percent Goal Attainment Certification

Date _____

Signature _____

Title _____

Company name _____

B. Certification of inability to meet _____ percent of goal and good faith efforts.

The bidder hereby certifies that it is unable to meet the _____ percent DBE participation goal for this project, described by the procurement administrator as _____, and that it has made a good faith effort to maximize the DBE participation that is consistent with 49 CFR Part 26 and with Category III, Section 23 of this document.

The bidder certifies that it is able to meet _____ percent DBE participation.

Date _____

Signature _____

Title _____

Company name _____

CERTIFICATION OF DISADVANTAGED BUSINESS ENTERPRISE (DBE) ACCOMPLISHMENT

(To be completed by the prime contractor and submitted with the final documents for all federal-aid contracts.)

County _____ Letting date _____

Contract identification number _____

Prime contractor _____

Total DBE commitment listed on Iowa DOT Form 102115 _____

DBE companies	Dollars committed (Form 102115) (1)	Dollar amount paid	Percent for goal (*60 or 100) *For suppliers only.	Dollars DBE credit
			Total	\$0.00

(1) If no DBE goal was established for the contract, enter 0.

I, _____ the _____
(name) (corporate officer)

of _____ certify the DBE accomplishment to be
(prime contractor)
true and accurate.

It is understood that the accomplishment will be compared to the commitment and may result in a penalty in accordance with Article 1102.17 of the Standard Specifications.

(date) (signature)

Comments _____

- | | | |
|------------------------------|-----------------------------|---|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Form 102115 commitment (1) |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Approved adjustments |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Revised Form 102115 commitment |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Contractor accomplishment |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Reduction in prime contractor payment
(include a copy of change order for any
reduction in prime contractor payment.) |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Locally paid projects only |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Federal dollars in contract |

I have monitored the work performed by the DBE and certify that the work performed was done by the DBE listed above as required by Article 1102.17 F and G of the Standard Specifications.

(project engineer) (office)