

# DBE Contractors We need you...



# Neutral DBE Participation Collection / Credit

## This guide is meant to help contractors accurately report engagement with Disadvantaged Business Enterprises (DBE).

Initial commitments for DBEs are set with form **DT1506**. When these commitments are exceeded, this is called neutral or voluntary participation. Neutral or voluntary participation is tracked by filing Attachment A to DT1506.

It is very important to accurately track DBE engagement. It not only helps determine whether goals are met, it also informs future goal setting.

The reported information helps to:

- Accurately reflect DBE utilization through the life of the project instead of just upfront
- Evaluate participation trends and potentially set lower DBE goals on future projects

### Here's what to do ►

When adding a DBE contractor to a project after the original DBE commitment is approved, submit Attachment A from the **DT1506**. It must be:

- Signed by the prime contractor and the DBE
- Submitted after first payment to record accurate participation

### Additional Attachments A? No problem.

They can be submitted throughout the project.

- Submit an Attachment A for the total subcontract value, including those submitted with bids (DT1506/electronic commitment)
- Submit a final Attachment A to: **DBE\_Alert@dot.wi.gov** when the DBE is finished working on the project
- OR Submit a final Attachment A to DBE Alert (as above) during the Finals Process when Compliance receives notice of "Substantially Complete"

### ► **NEW for 2022** ► Special note on trucking after award/execution ►

- Only submit Attachment A for DBE truckers that were not on **DT1506**
- Do not submit Attachment A for additional trucking commitment for DBE firms included with the bid (DT1506/electronic commitment)
- OBOEC will confirm trucking commitment and utilization through CRCS, payment reporting, the Trucking Schedule, and hiring agreements
- Final Attachment A is not required for trucking but must be submitted if requested as part of CUF monitoring

WisDOT Compliance and DBE offices are committed to excellence in service. Contractors can expect follow-up from WisDOT staff to ensure full accuracy of DBE commitments and Attachment(s) A.

## Questions?

Contact the Compliance Specialist on your project or the DBE Office at: **DBE\_Alert@dot.wi.gov**

## FAQs

### Why can't WisDOT use the payroll entries in CRCS to verify all DBE commitments?

We must confirm that the DBE performed work in an area in which they are certified by NAICS code.

*Examples:*

- A landscape firm is certified to perform sign installation under NAICS code 237310, but has exceeded the cap designated by the SBA to perform work under the NAICS code 561730 (Landscaping Services). We'd need to verify payment is related to sign installation **ONLY** to approve DBE credit.
- A supplier is providing materials under the appropriate NAICS code but the percentage of credit (10%, 60%, 100%) must be confirmed per ASP-3.
- The DBE Office must verify DBE trucking commitments and how many of the trucks used were DBE-owned. **NEW** – we can usually do this without requiring another Attachment A for DBEs already on the commitment.

### Where is this language stated, and is it mandatory?

The language is in ASP-3 and is being updated to reflect the Attachment A process. Further guidance regarding DBE Program requirements is provided in 49 CFR Part 26.

### What will happen if I don't comply?

WisDOT will not be able to claim credit towards the overall annual goal likely causing project level goals to be higher.

[wisconsindot.gov/DBEcontracting](https://wisconsindot.gov/DBEcontracting)