



Civil Rights Division
Disadvantaged Business Enterprise (DBE) Compliance Review Report

Report Submittal Date
District
Contract ID
Project Number
Contract Award Date
Prime Contractor
DBE Firm
C-111 Dollar Amount
DBE Firm Type

A. Subcontractor
B. Trucking Firm
C. Supplier
D. Bulk Materials Supplier
E. Manufacturer
F. Broker
G. Consultant

DETERMINATION

Compliant
Non-Compliant
The DBE Firm is Performing a Commercially Useful Function (CUF)
The DBE Firm is Not Performing a CUF in Whole or in Part

1. Is a reduction in DBE contract participation credit warranted because of non-compliance?
2. DBE participation credit reduction amount
3. Date contractor notified of credit reduction

I certify that I have monitored and evaluated the DBE firm's participation, and the above determination is consistent with observation, contract documentation and DBE participation criteria in 49 CFR §26.55:

Signature
Date
Print Name
Title

The Civil Rights Division may alter or amend this determination at any time while the contract is active, in response to new or changing information about the DBE firm, the prime contractor or any other contract participant. This form documents VDOT's compliance with federal-aid recipients' monitoring requirements in 49 CFR §26.37.

Report Documentation and DCRM Approval

Contract Type:

VDOT Construction	_____	Design-Build	_____
Local Assistance	_____	P3	_____

Documentation: Reviewed Attached

Correspondence	_____	_____
C-111	_____	_____
C-112	_____	_____
DBE Price Quote	_____	_____
C-31/Subcontract	_____	_____
Lease Agreement	_____	_____
Invoices	_____	_____
Cancelled Checks	_____	_____
Joint Checks	_____	_____
Shipping Tickets	_____	_____
Equipment Data	_____	_____
Vehicle Data	_____	_____
Certified Payrolls	_____	_____
DWR's	_____	_____
Photos	_____	_____

Narrative Reports and/or Checklists Provided by the Following:

Civil Rights Specialist	_____	_____
District Civil Rights Manager	_____	_____
Inspector	_____	_____
Prime Contractor	_____	_____
DBE Firm	_____	_____
Equipment Supplier	_____	_____
Manufacturer	_____	_____
Distributor	_____	_____
Other (Specified Below)	_____	_____

District Civil Rights Manager Approval:

Signature: _____ Date: _____

Name: _____ Title: _____

A. Subcontractor DBE Compliance Review

1. Description of work being performed _____

2. Is the scope of work specified in a written subcontract? Yes _____ No _____

3. Start date and duration of DBE's work: _____

4. Site Management Personnel. Check all that apply:

VDOT Inspector(s) _____ Prime _____ Consultant _____ Civil Rights _____

5. Date of Civil Rights onsite visit, if applicable: _____

Site Manager Interview

Date of Interview: _____ Official's Name: _____

Phone Number: _____ Title: _____

6. Has the DBE subcontracted any part of its work to other firms?
 Yes _____ *If Yes, attach all documentation* No _____

7. Is the DBE completely responsible for its own management, workforce, equipment, materials and performance? Yes _____ No _____ Unable to Verify _____

8. Is the DBE performing its work without outside assistance and in keeping with normal industry practice? Yes _____ No _____ Unable to Verify _____

9. Is the DBE fulfilling the terms of its subcontract without significant performance issues? Yes _____ No _____ Unable to Verify _____

10. Civil Rights Division DBE Subcontractor CUF Determination. Monitoring of the DBE by one or more site managers and/or the Civil Rights Division indicates the following compliance status:

Work Areas	Does the DBE Provide a CUF?		CUF Analysis and Documentation Attached	
A. Management	Yes _____	No _____	_____	_____
B. Workforce	Yes _____	No _____	_____	_____
C. Equipment	Yes _____	No _____	_____	_____
D. Materials	Yes _____	No _____	_____	_____
E. Performance	Yes _____	No _____	_____	_____

11. Summary of Compliance or Non-Compliance Status:

12. Is the DBE performing a commercially useful function (CUF)? Yes _____ No _____

13. If applicable, enter the dollar amount of any participation credit reduction for the DBE firm on this contract: _____

C. Supplier/Regular Dealer DBE Compliance Review

1. Address of supplier's warehouse/distribution facility (required)

2. Briefly describe the materials being supplied for this contract. Attach copies of quotes and invoices provided to the contractor

3. What is the source of the materials being supplied?

The Supplier's Own Stock _____ Supplemented Stock _____ Manufacturer(s) _____

4. DBE representative/manager in charge of this order

5. Supplier's distribution equipment, if any

Truck Number _____ Plate Number _____ US DOT Number _____ Truck Model _____

6. Supplier/Regular Dealer CUF Determination.

Supplier Work Areas

Does the DBE Provide a CUF, Without Red Flags?

- | | | | | |
|--|-----|-------|----|-------|
| A. Independently negotiates prices and quantities | Yes | _____ | No | _____ |
| B. Purchases directly from manufacturers | Yes | _____ | No | _____ |
| C. Independently pays for all items | Yes | _____ | No | _____ |
| D. Regularly stocks items supplied for this contract | Yes | _____ | No | _____ |
| E. Actually stocked items supplied for this contract | Yes | _____ | No | _____ |
| F. Independently assures quality and quantities | Yes | _____ | No | _____ |
| G. Arranges and pays for all distribution/deliveries | Yes | _____ | No | _____ |

7. CUF Analysis and Documentation Attached: Yes _____ No _____

8. Is the DBE acting as an "extra participant" in a supply chain where the prime contractor will normally do business directly with manufacturer(s)? Yes _____ No _____

Summary of Compliance or Non-Compliance Status

9. Enter any participation credit reduction amount for the DBE firm on this contract (with supporting documentation attached): _____

D. Bulk Materials Supplier DBE Compliance Review

1. Address of DBE facility where bulk materials are produced or stored, if any

2. Material supplied for this contract:

3. Source of materials being supplied?

4. Site Manager Interview Date(s)

5. Onsite Observation Date(s)

6. Supplier's Distribution Equipment (Required):

Truck Number	Plate Number	US DOT Number	Truck Model
_____	_____	_____	_____
_____	_____	_____	_____

7. Bulk Materials Supplier CUF Determination.

Bulk Materials Supplier Work Elements	Does the DBE Provide a CUF, Without Red Flags?			
A. Independently negotiates prices and quantities	Yes	_____	No	_____
B. Purchases directly from manufacturer/source	Yes	_____	No	_____
C. Independently pays for all items	Yes	_____	No	_____
D. Independently assures quality and quantities	Yes	_____	No	_____
E. Owns the distribution equipment being used	Yes	_____	No	_____
F. Supplements its distribution equipment through a long-term lease agreement	Yes	_____	No	_____
G. Directly employs the operators of distribution equipment	Yes	_____	No	_____

8. CUF Analysis and Documentation Attached: Yes _____ No _____

9. Is the DBE acting as an "extra participant" in a supply chain where the prime contractor will normally do business directly with manufacturer(s)? Yes _____ No _____

Summary of Compliance or Non-Compliance Status

10. Enter any participation credit reduction amount for the DBE firm on this contract (with supporting documentation attached): _____

E. DBE Manufacturer Compliance Review

As described in 26.55(e)(1)(ii), a manufacturer is a firm that operates or maintains a factory or establishment that produces, on the premises, the materials, supplies, articles or equipment for sale to the construction industry.

1. Address of the DBE's manufacturing facility

- | | | | | |
|---|-----|-------|----|-------|
| 2. Is the DBE's main function to manufacture construction products? | Yes | _____ | No | _____ |
| 3. Does the DBE stock the product sold for this project as a normal stock item? | Yes | _____ | No | _____ |
| 4. Is the quality of materials controlled by the DBE? | Yes | _____ | No | _____ |
| 5. Does the DBE purchase the raw material used in its plant? | Yes | _____ | No | _____ |
| 6. Do all products carry the DBE's label? | Yes | _____ | No | _____ |

7. Enter any participation credit reduction amount for the DBE firm on this contract (with supporting documentation attached): _____

F. DBE Broker Compliance Review

1. The DBE is not acting as an "extra participant" in a supply chain where the prime contractor would normally do business directly with manufacturers TRUE _____ FALSE _____
2. Is a variety of construction products and services available through the DBE broker?
Yes _____ No _____
3. Are the DBE broker's fees reasonable? Yes _____ No _____
4. Total amount of invoice to the contractor _____
5. Total amount of broker fees charged by the DBE _____

6. Enter any participation credit reduction amount for the DBE firm on this contract (with supporting documentation attached): _____

G. DBE Consultant Services Compliance Review

1. Description of scope of work _____

2. Dates active _____ to _____

3. Name and contact information for the DBE's project manager

4. Project Manager Interview Date _____

- A. The DBE has all required expertise and licensing to do the work Yes _____ No _____
- B. The DBE is not assisted by other firms Yes _____ No _____
- C. The DBE performs at least 30% of the work with its own staff Yes _____ No _____
- D. The DBE schedules and manages work for its subcontract Yes _____ No _____
- E. Is the DBE on schedule to complete all work as specified in its subconsultant agreement?
Yes _____ No _____
- F. Is the DBE's subconsultant agreement on file? Yes _____ No _____
- G. Does the DBE have any concerns about its ability to satisfy the terms of the agreement?
Yes _____ No _____

If "Yes," please explain: _____

5. Please discuss any CUF issues that may exist or require further investigation:

6. Enter any participation credit reduction amount for the DBE firm on this contract (with supporting documentation attached): _____