



# Illinois Department of Transportation

Office of Business & Workforce Diversity  
2300 South Dirksen Parkway / Springfield, Illinois 62764

## Questions and Answers Regarding new DBE and Bidders List Requirements – 3/3/2025

### *BIDDERS LIST INFORMATION*

#### Bidders List Format and Process:

1. Why is the bidders list submission form set up the way it is? Why not an excel spreadsheet, a direct entry into icx, a fillable pdf? Why is all of this information not required when plans and specs are downloaded?

*Unfortunately, our systems don't currently allow for uploading of a spreadsheet or entering the needed information directly into iCX as a feasible means of collecting the data and subsequently compiling it for the required reporting to USDOT, or for linking the required information to plan and spec downloads. IDOT will continue to explore options to streamline the process going forward and appreciates the input and suggestions we have received so far, but have set up the SBE 2020A form as the best option available with the systems we currently have in place.*

2. Can it be set up to allow more than 10 entries at a time? Or to be all on one page, rather than clicking through multiple pages?

*At this time, the form does not allow for the input of more than 10 entries at once. IDOT will continue to explore options to streamline the 2020A form and take these suggestions into consideration.*

3. Is it necessary to submit bidders list information from the icX link, or can the information be accessed directly?

*The form can be accessed directly from the [Construction Contractor Quick Links](#) page and information can be submitted that way. It is not necessary to go through icx to reach the form and make submissions, however, even if you have already submitted your bidders list information, when you are in iCX to enter your bid, you will need to click the link to the 2020A form from within iCX in order to continue through the system with your bid submission, as iCX will not allow the submission of a bid until the link has at least been clicked and the acknowledgement box checked.*

#### Timing of bidders list submissions

4. Why is the bidders list required at the time of bid? Is there a grace period? Why can't the information be submitted up to five days after the bid?

*The federal regulation states that IDOT "must collect the data from all bidders for your federally assisted contracts by requiring the information in paragraph (c)(2) of this section to be submitted with their bids. . ." 49 CFR 26.11(c)(3). At this time, IDOT is not implementing a grace period for the submission, but asks that prime contractors make their best effort to comply with the requirement at the time of bid.*

5. What if you do not know all of the subcontractors, trucking or supply firms you will use at the time of bid?

*You are required to provide information about all subcontractors, trucking and supply firms who have given you quotes or bids for the job as the time of bid, whether or not you will use those firms. At this time, you are not required to submit information about any quotes or bids you receive after the time of bidding, even if you ultimately do choose to use those firms.*

6. Can bidders list information be submitted as quotes are received? What if a prime submits the information and then receives additional quotes?

*Prime contractors may submit bidders list information at any time once the form is opened for submission. This means that a contractor can go to the form and make submissions as many times as needed. If you want to do them as you get them that is fine. If you submit most of them a couple days ahead of the bid deadline and then receive a few more and need to input another submission, that is also fine.*

7. Is there a cutoff time that subcontractors, trucking and supply firms must have information submitted in order to get entered in time?

*There is not a cutoff for submission of quotes by subcontractors, trucking and supply firms other than the time of bid.*

8. If a prime establishes a cut off time and notifies all subcontractors, trucking and supply firms of their cutoff, and then receives quotes after this time, does the prime still have to report quotes received after this cut off? Does bidders list information have to be updated if additional quotes are received after the bid is submitted?

*49 CFR 26.11(c) states that IDOT must obtain the bidders list information about all DBE and non-DBEs who bid as prime contractors and subcontractors, and that the data must be collected from all bidders by requiring that it be submitted with their bid.*

9. If a prime receives quotes/bids after its bid has been submitted, does it have to pull its bid and add it to the bidders list?

*Receipt of additional quotes or bids does not require that a bid be pulled. The bidders list form is completely separate from iCX and can be updated without impacting any bid previously submitted into iCX. The bidders list form will close for entries as of 12:01 on the day of letting.*

## Information Required

10. Is there a link to all of the information required for USDOT?

*See Section (c)(2) of [eCFR :: 49 CFR 26.11 -- What records do recipients keep and report?](#)*

11. Please confirm that primes are not responsible for gathering subcontractor data requested in 49 CFR 26.11 (Firm name; Firm address including ZIP code; Firm's status as a DBE or non-DBE; Race and gender information for the firm's majority owner; NAICS code applicable to each scope of work the firm sought to perform in its bid; Age of the firm; annual gross receipts of the firm)

*Correct, the prime is not responsible for collecting all of this information about subcontractors, suppliers and trucking firms from whom they receive quotes or bids. Primes are only responsible for providing those firms' registration numbers in order to identify them, and the prime must provide the NAICS Codes for the work those firms are seeking to perform on the job in question.*

12. What is the purpose of collecting this information? Why are primes required to provide it? Shouldn't IDOT already have all of this information?

*USDOT is wanting to collect robust data about WHO is seeking to do WHAT WORK on WHICH DOT funded projects. IDOT responded to feedback received after the initial rollout of these updates in December and made significant adjustments to help ensure we are not requiring bidders to collect more information than absolutely necessary. That said, it is still necessary to tie the details about the firms seeking to do work to information about what work they are seeking to do on which contracts, so some amount of cooperation from the prime contractors is necessary for IDOT to collect the required info and fulfill its reporting obligations. IDOT does not already have all of the information that must be provided and cannot collect in advance the information needed about who is seeking to work and what they are seeking to do on each job.*

13. Why do we have to submit every NAICS Code that a subcontractor is registered for? Why can't subcontractors just be linked to their NAICS Codes by their registration number?

*It is not necessary to submit every NAICS Code a subcontractor is register for. Instead primes are required to submit the NAICS codes for the specific work a subcontractor is seeking to perform on a specific job. Often this will not be every work category that the subcontractor is able to perform overall.*

14. Why are Suppliers and Trucking Firms included in the bidders list requirement when the regulation only mentions primes and subcontractors?

*Although IDOT treats subcontractors as separate from trucking and supply for our internal purposes, when the CFR refers to subcontractor it includes anyone providing supplies or services in a USDOT assisted program. For purposes of the bidders list requirement, under 49 CFR Part 26, trucking and suppliers fall within the meaning of subcontractor, and we have confirmed with FHWA that trucking and suppliers are to be included in the bidders list requirement.*

15. Do subcontractors have to submit quotes electronically? Will subcontractor quotes be made publicly available?

*The bidders list requirement does not apply to subcontractors, only prime contractors, and does not include any requirement that subcontractors submit their bids electronically. The bids and quotes provided are not given to IDOT as part of the bidders list, those subcontractors, suppliers and trucking firms will just be identified as having given a quote to the prime. The details about who bid to try to work on each job will be reported to USDOT, but the details of subcontractor quotes to specific prime contractors will not be made publicly available.*

16. Do bids and quotes made to subcontractors have to be submitted by the prime with its bidders list?

*The only information a prime must submit on the bidders list form is the quotes it receives from subcontractors, suppliers and trucking firms for that job. Subcontractors are not required to report to primes, and primes are not required to report on the bidders list, quotes received by subcontractors for 2<sup>nd</sup> tier subcontracting, supply or trucking work.*

## Compliance and Impact

17. Do you have to submit the bidders list/Form 2020A if the project being bid on has only state or local funds?

*The requirements are the same for all IDOT let jobs, including jobs with state-only funds.*

18. What is the penalty for not filling out the bidders list information correctly/completely, or for missing a quote when completing the bidders list?

*At this time, there is no penalty imposed for incomplete or incorrect information, but IDOT will monitor compliance and update policies as needed. We expect all of our contractors will do their best to comply with the special provision and they will not be penalized if they do so.*

19. If a Prime Contractor does not submit a subcontractor on the 2020A form before the bid is closed, are they precluded from using that subcontractor once the contract is awarded?

*A prime is not precluded from using subcontractors, suppliers or trucking firms that they get quotes from or arrange to use after the bid is submitted. The requirement at this time only requires the prime provide information about the quotes received up to the time they submit their bid.*

20. What if a subcontractor/supplier will not supply their information or refuses to register with IDOT? How should the bidders list be handled? Can the prime still use that firm?

*In order to input the information into the bidders list, you must have the registration number. Additionally, per federal law all subcontractors/truckers/suppliers are required to register with IDOT in order to bid or quote on contracts. At this time, there is no penalty for using a firm that refuses to register, but that firm will not be able to begin work until their registration is submitted and approved.*

21. Will the new requirements affect existing contracts that have not started yet?

*The new bidding and bidders list requirements will not have any impact on existing contracts. This requirement will be in effect starting with the March 7, 2025 letting.*

## Subcontractor, Supplier and Trucking Firm Registration

22. If you are a prime and a subcontractor, where do you update your information?

*Prime contractors will be contacted separately to update the specific information linked to their prequalification number. Prime contractors do not need to also register as a subcontractor.*

23. If a subcontractor is also a supplier, do they have to be registered in supplier module?

*Please use the subcontractor registration number. There is no need to register again as a supplier.*

24. How long does it take to receive a registration number after completing the application?

*The registration number is provided via email within 1-2 days after registration is completed.*

25. Is there a database/listing of registration #'s or does the prime need to require each sub/supplier to provide?

*There are reports listing all registered subcontractors, suppliers and trucking firms. These can be found on the [Subcontractors](#) and [Truckers and Suppliers](#) Registration pages. The lists are updated each Monday morning and are searchable by keyword.*

26. Since Registration List is only updated on Mondays, can it be updated at EOD on Wednesday 3/5/2025?

*Yes, this will be done.*

27. What is the cutoff date for subs and trucking companies register for their s/c number to be allowed in the 03/07/25 letting?

*All firms have been advised to update their registration no later than Tuesday March 4<sup>th</sup>, to ensure that they have received their registration number and can provide it to primes ahead of the letting.*

28. What if a subcontractor, supplier or trucking firm doesn't receive its registration number before the letting?

*Reach out to SBE at (217) 782-5490 or Construction at (217) 782-3413 to get the number.*

29. Does a supplier of liquid asphalt and emulsions that is not a DBE need to register with IDOT as a supplier?

*All suppliers of materials used on IDOT jobs, whether or not a DBE firm, are required to register with IDOT.*

30. Do suppliers to subcontractors need to register?

*A supplier that only provides quotes or bids to subcontractors and not to prime contractors is not required to register at this time. Suppliers of the underlying components used to manufacture or produce materials for IDOT jobs are also not required to register at this time.*

31. If a supplier has an IDOT producer number, can that be used or is a new registration required?

*An IDOT producer number cannot be used, the firm must register separately and provide the registration number. The producer number is issued by the Bureau of Materials and does not link the firm with the specific details that IDOT will need to report to USDOT.*

32. Does each owner/operator of a truck need to be registered and submitted?

*If an owner/operator is providing bids or quotes to prime contractors offering trucking services for IDOT jobs, it should be registered with the IDOT trucking/supplier database.*

33. Are providers of professional services who submit bids or quotes to primes for highway construction work required to register as subcontractors?

*Currently, there is not a registration system in place for providers of professional services who bid on IDOT construction jobs and their quotes may be excluded from the bidders list.*

## General Questions About New Participation Forms

### NEW DBE UTILIZATION PLAN REQUIREMENTS

34. Have DBE Trucking and Supplier firms been trained in how to complete the forms?

*Two Webex trainings were held at the end of February 2025, as well as an in-person training at the TCTR Conference. All of these were available to DBE firms. Additionally, the Webex training on how to complete the new forms is available on IDOT's YouTube channel at [Illinois Department of Transportation - YouTube](#).*

35. Can revision dates be added to the form links so that you can be sure you have the most updated version?

*IDOT will look into making this update.*

36. Why aren't Participation forms put into excel so that number totals in multiple spreadsheets can be added together?

*At this time, our available systems do not allow for this option, but we will continue to explore avenues to improve our forms and processes.*

37. Can the Participation statements say "see attached" and have quotes attached?

*IDOT prefers that the information required be entered into the form provided, but will accept forms that state see attached and include attached quotes, so long as complete information is provided. If attaching a quote, it will be necessary to enter in 1 as the quantity and input the total amount of the quote in the form.*

38. Does a DBE Prime need to attach its quote to the SBE 2025?

*If a DBE Prime is self-performing all of the work of the job for 100% goal credit, then the form can be completed by stating that it is self-performing 100% and entering the total amount in the form. If portions are to be subcontracted, additional detail about exactly which pay items are being self-performed must be provided, either by entering those into the table, or by attaching a quote that specifies those items and entering the total in the table with the attached quote referenced.*

39. SBE2024, SBE2025 and SBE2023 need to be filled out by the quoting entity and sent to the prime, is this correct?

*Only Section 3 of the SBE 2024 (DBE Participation Statement – Supplier) is required to be completed by the DBE firm. All other Participation Statements may be completed by either party, but must be reviewed, agreed to and signed by both parties.*

40. Is a subcontractor required to complete the SBE 2025 form if it is not a DBE firm?

*No, the SBE 2025, 2024 and 2023 forms are only required to provide information about work to be performed by certified DBEs for goal credit.*

41. Who is responsible for the information in the Participation Statements being correct?

*Ultimately, the responsibility for ensuring that the DBE firm is used to perform the work committed falls to the prime contractor. If a DBE firm does not perform a commercially useful function in providing the work committed to that firm in the Participation Statement, goal credit will not be counted and the prime may fail to meet its DBE goal obligations for the contract and be subject to the associated penalties.*

42. Will IDOT reject all bids that accidentally use the older forms?

*No, for the March 7, 2025 letting, submission of old versions of the DBE U-Plan and DBE Participation forms will not result in a rejection. Rather, SBE will reach out to primes that submit the old forms and request that the information be resubmitted on the new forms. Upon reaching out, SBE will provide a deadline for resubmission. The resubmission on new forms is not an opportunity to change the content of the DBE Participation Statements. ALL PRIMES ARE REMINDED TO ENSURE THAT THEY INCLUDE A CURRENT AND REGULARLY CHECKED EMAIL ADDRESS ON THEIR UTILIZATION PLAN FORMS TO ENSURE ANY ERRORS CAN BE TIMELY CORRECTED.*

## DBE Work Notification Requirement

43. Is the 3 day notification requirement 72 hrs, 3 business days or 3 calendar days?

*3 calendar days.*

44. If notification is not provided for whatever reason, does that mean that the DBE participation on that day will not be considered?

*If notification is not provided and this results in IDOT being unable to perform a CUF review for that DBE firm and verify that the firm performed a commercially useful function on the job, this may result in goal credit not being counted for the work of that DBE firm. If the prime does not know three days in advance of when the DBE will perform, the prime must provide as much notice as possible.*

45. Who at the District is to be notified in advance of DBE firms performing work for goal credit?

*Please provide this information to District staff as directed at the preconstruction meeting.*

46. What if IDOT staff cannot be onsite after being notified?

*IDOT will take necessary steps to ensure that a CUF can be performed and relevant information about what has occurred at the jobsite can be gathered in the event the District CCO cannot be present on the date on which the prime notifies the DBE will be performing the work.*

47. If a subcontractor notifies a prime of when they will be at the jobsite, are there additional steps the subcontractor must take to make sure the District is notified for CUF review?

*The requirement to notify the District of when a DBE will perform is the responsibility of the prime contractor. The subcontractor is not required to make that notification, but may also provide that notice to the designated District personnel identified at the preconstruction meeting, for added assurance that the notice will be made.*

48. Does the 3 day notification requirement for DBE Trucking apply to every day that the DBE will be performing trucking, or just when the DBE begins performing trucking work on the project?

*The requirement is satisfied if the prime notifies the District at least 3 days prior to the first day the DBE Trucking firm will be performing the work for which the prime is using that DBE for goal credit.*

## New SBE 2024 DBE Participation – Supplier Form

49. Does a non-DBE supplier of liquid asphalt/emulsions, rebar or or a materials provider need to provide any of the new IDOT forms?

*Non-DBE suppliers should be registered with IDOT as suppliers and provide their registration number to prime contractors to whom they submit bids, but are not required to complete any of the DBE Utilization Plan forms, such as the SBE 2024 – DBE Participation – Supplier form.*

50. How is goal contribution with material suppliers? EX1: Non DBE electrical contractor purchases materials from DBE supplier.

*For the prime contractor on a job to get DBE goal credit for material supply, the prime must submit a DBE Participation Statement – Supplier form (SBE 2024) indicating what materials for the job are going to be purchased from the DBE supplier and at what goal credit percentage, depending on whether the DBE supplier will qualify as a manufacturer, regular dealer, distributor or broker. If a non-DBE subcontractor purchases materials from a DBE supplier, the prime can still get goal credit for that purchase. The non-DBE subcontractor and the DBE supplier will need to complete the SBE 2024 form and provide it to the prime to be submitted with the Utilization Plan to be counted toward goal credit.*

51. To clarify, under Regular Dealer (b), if you check "No," you continue to (1) or (2). If you check yes for (1), do you go to (b)(i)(2) or (b)(ii)?

*If you check No, that you are not going to provide all of the products supplied for this contract from your inventory, then proceed to the next question (1). If no to question (1), proceed to (b)(i)(2). If yes to question (1), proceed to (b)(ii).*

52. For DBE Regular Dealers, what documents are required to be submitted to confirm inventory of quoted items on hand. And at what time do such documents need to be submitted?

*Any inventory list or documentation that you use for your business is acceptable. An inventory list showing that you do regularly stock the items to be provided for the particular contract should be provided at the precon meeting. Further documentation to show that at least 51% of the products were in fact supplied from your inventory must be provided within 30 days after delivery of those items to the jobsite.*



53. For purposes of verifying that a DBE is a Regular Dealer of bulk or specialty items, where the form asks whether the DBE owns distribution equipment, what is meant by distribution equipment?

*The specific distribution equipment needed will depend on the type of item being supplied. That may in some cases include trucks, but certain items may require more specialized equipment.*

54. What if you are considered a Regular Dealer for some pay items on a contract, and a Distributor or Manufacturer for other pay items?

*The form is structured to allow for a supplier that falls within different categories for different items. You will need to ensure that you are applying the correct goal percentage to the purchase amounts for the products in each category, then add all of those calculated amounts to determine the total goal credit amount for your work as a supplier for that contract.*

55. What happens if on a supplier the type of M, D, RD, B at time of bid is determined that it's not correct and then goal is not met? If a DBE fills the form out incorrectly, will the prime be penalized if the DBE firm is used and not get goal credit?

*Goal credit achievement will be counted based on the category for which the supplier performs a commercially useful function during the job. If the supplier cannot meet the requirements to perform a commercially useful function for the category of goal credit it affirms on the Participation Statement at the time of bid, then the prime will only receive goal credit based on the supplier category for which the supplier did meet the minimum requirements. For example, if the supplier indicates on the participation statement that it is a regular dealer of the items to be provided, but cannot document that at least 51% of the items for the job came from its stocked inventory, then the goal credit amount counted will only be 40% of the value of suppliers purchased, as the supplier as met the requirements for a Distributor, not a regular dealer.*

## NEW SBE 2023 DBE Participation – Trucking Form

56. How is goal contribution counted for DBE trucking if a DBE firm comments to 10 trucks and sends 1 company truck and 9 broker trucks from another DBE firm? What if it sends 1 company truck, 4 broker trucks from a different DBE firm and 5 broker trucks from a non-DBE firm?

*49 CFR 26.55 does not provide an option for brokered trucks for DBE goal credit. A brokering agreement does not allow for the DBE to manage and supervise the trucking operation, which is required by the regulations for DBE goal credit for trucking. Also, a brokering agreement does not meet the regulatory requirements for a lease agreement, which must allow for the DBE to control the leased trucks. DBE goal credit for brokered trucking can be counted if the broker is certified as a DBE broker, also referred to as a transportation expediter, and listed in the approved Utilization Plan. The DBE broker would only qualify for goal credit when using DBE trucking firms.*

*In the example given, goal credit would only be allowed for the one DBE Company truck, due to the broker trucks being managed and supervised by someone other than the DBE Trucking Firm.*

57. For Trucking, please confirm DBE goal credit is calculated as outlined in 49 CFR 26.55 example paragraph (d)(5)?

49 CFR 26.55(d)(5) states that if a recipient (transportation agency) chooses to allow goal credit using the approach set forth in that section, it must obtain written consent from the appropriate DOT operating administration. IDOT has not obtained such consent from FHWA, therefore goal credit based on a DBE leasing trucks from a non-DBE firm as set forth in that section is not a valid option for IDOT jobs.

58. If a trucking firm uses brokers, do they have to be listed as a second tier? How is that possible at the time of bid?

49 CFR 26.55 does not provide an option for brokered trucks for DBE goal credit. A brokering agreement does not allow for the DBE to manage and supervise the trucking operation, which is required by the regulations for DBE goal credit for trucking. Also, a brokering agreement does not meet the regulatory requirements for a lease agreement, which must allow for the DBE to control the leased trucks. DBE goal credit for brokered trucking can be counted if the broker is certified as a DBE broker, also referred to as a transportation expeditor, and listed in the approved Utilization Plan. The DBE broker would only qualify for goal credit when using DBE trucking firms.

59. How is the Trucking Participation form to be completed based on bid item quantity vs. hourly rate?

The form is setup to show specifically how the quote was determined, which requires that it be broken out into unit price and unit of measure. The quotes received in DBE U Plan forms showing DBE trucking participation show a variety of different units used to determine price, including tonnage, hours, sq yds, etc. SBE uses the information submitted to determine how the amount was obtained. If that information is not included, SBE is unable to verify that the DBE negotiated the rate being relied upon. If items of bid include items that are non-ticket bid items, it is the responsibility of the prime to determine a means of tracking that information.

60. There is no pay item for Trucking; how should the pay item portion be completed?

Trucking can be tied to various pay items from the job, and the pay item in which trucking services will be provided must be listed on the form.

61. DBE firms are not always given all of the required information and pricing by the primes to fill in ahead of time.

The DBE trucking firm and the prime should be negotiating the agreed price for trucking services and what that pricing is based on in conjunction with the specific type and amount of work the prime is committing to using the DBE trucking firm to perform.

62. The DBE trucking firm must be "certified in a work category applicable to the kind of work the firm has committed to perform on the contract." Does this mean that Western must be certified in tree removal to haul off trees, certified in hot mix removal in order to haul off millings, certified in asphalt in order to haul asphalt from a plant to the job site, or certified in concrete or curb and gutter to haul off concrete??

The DBE trucking firm must be certified in trucking generally. In order to perform a commercially useful function for goal credit, the firm must have or lease the type of truck required to move the specific product in question (material and/or pay item).

63. If DBE trucking will be considered a subcontract, will that trucking company need to be tracked (payments) on ICX, and/or submitted through the vendor portal if over \$50,000.00?

*Yes, as set forth in the Subcontractor and DBE Payment Reporting Special Provision, and Section 109.14 of the Standard Specifications for Road and Bridge Construction, payments to DBE trucking firms must be tracked in the portal.*

64. If a list of independent truckers is provided at bid time and those change once the job begins, does the GC then have to submit new paperwork to "replace or terminate" the at bid time submitted truckers?

*Yes, any change to the DBE firms listed to perform work in the U Plan requires the prime to follow the process spelled out in the regulations for termination and/or replacement.*

65. How can a DBE trucking firm be added after the U Plan has been approved?

*If the prime needs to use additional DBE trucking beyond what was included in the U Plan, an additional SBE 2023 form should be submitted to SBE. Additional DBE trucking can no longer be added by including that trucking on the Weekly DBE Trucking Report.*

## NEW SBE 723A – Trucking Detail Form

66. Brokers do not know what trucks they will be sending to the job, often until the day it is sent. How can they provide information about the trucks to be sent in advance?

*49 CFR 26.55 does not provide an option for brokered trucks for DBE goal credit. A brokering agreement does not allow for the DBE to manage and supervise the trucking operation, which is required by the regulations for DBE goal credit for trucking. Also, a brokering agreement does not meet the regulatory requirements for a lease agreement, which must allow for the DBE to control the leased trucks. DBE goal credit for brokered trucking can be counted if the broker is certified as a DBE broker, also referred to as a transportation expediter, and listed in the approved Utilization Plan. The DBE broker would only qualify for goal credit when using DBE trucking firms.*

67. Why do we have to fill out the pay item # and \$ amount on the trucking detail form, when IDOT already has that info from the SBE 2023 that is submitted with the bid?

*This level of detail is necessary to ensure that IDOT staff can verify that the DBE trucking firm is performing a commercially useful function in providing the trucking services to which it was committed in the Utilization Plan, by allowing compliance staff to match the work performed with the specific trucks to be performing that work.*

68. How can a trucking firm identify which trucks will be on a specific job weeks in advance?

*A DBE Trucking Firm must be able to ensure the DBE is managing and controlling the trucking work for the job in order to perform a Commercially Useful Function for goal credit and should be able to identify the pool of trucks from which they will select those trucks to be used on the job. The DBE firm may list on the trucking detail form all trucks that could be used on the job, even if they know not every one of those trucks will ultimately be used. An updated form can be submitted if needed due to changes in the trucks owned or leased by the DBE prior to the work being performed.*

69. Can we attach a memo stating the details of the trucks our DBE trucking contractor owns, that would be eligible for DBE credit?

*As long as the attachment includes all of the required information, this will be accepted.*

70. What letting is the Trucking Detail Report (SBE 723A) required on?

*The SBE 723A is required for jobs on and after the March 7, 2025 letting and should be submitted at or prior to the preconstruction meeting.*

## Updated SBE 2026 Utilization Plan and SBE 2025 DBE Participation – Subcontractor Forms

71. There is ambiguity about what NAICS codes apply to which pay items. Can a proactive process be developed in which the prime contractors have visibility to the list of what pay items are covered under a particular NAICS code to better assure that the right subs are selected for the pay item? Better yet, can the NAISC code be added to each pay item on a contract-by-contract basis?

*The NAICS Code reference list that IDOT has developed to help with the bidders list requirement should also help as a guide to verifying that a DBE firm is certified in the NAICS Code necessary for the work to be performed. At this time, IDOT does not have the ability to add a NAICS code for each pay item on the contract, but will continue to explore options to update our systems to streamline these processes.*

72. As a DBE subcontractor, if I quote 10 line items to the prime and the prime only plans to use 5 of those line items in their bid, how will that get revised?

*The prime should complete the Participation form to list those pay items for which they are wanting to use the DBE subcontractor, and have the DBE subcontractor sign off on providing those pay items.*

### GENERAL QUESTIONS REGARDING DBE REQUIREMENTS

73. Does DBE only apply to federal funded projects? Some local entities request MBE certification; does DBE apply in those cases?

*With some exceptions, like the City of Chicago, most local entities do not administer the federal DBE program. However, a municipality or other entity can, on non-federal projects, establish their own MBE programs and requirements.*

74. How do we change our main contact in our company profile on your site?

*For subcontractors, suppliers and trucking firms, contact information can be updated through the [Subcontractors](#) and [Truckers and Suppliers](#) Registration pages. Prime contractors should reach out the Bureau of Construction to update contact information, and also make sure to include the most current contact information when filling out DBE Utilization Plan forms for a bid submission.*

75. Do the new rules apply to consultants?

*IDOT consultants who are hired for work through the PTB or LAB are subject to the updated DBE regulations and bidders list requirements. The updates to the applicable special provision and forms for those types of contracts are still in development and will be implemented as soon as possible, with additional communication and guidance specific to those areas.*