



Project Delivery Academy

DBE & OJT Program Plan Compliance

DBE = Disadvantaged Business Enterprise

OJT = On - the - Job Training

September 10, 2025

Meet the

BECO Contract Compliance Technicians



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Technician III

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**NORA
HERRERA**

DBE & OJT Compliance
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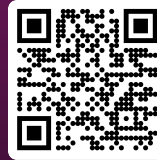
[nherrera2@
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**SHARON
BOVA**

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Technician

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Topics



DBE Program
Regulatory
Authority



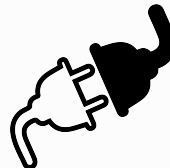
DBE Program
Overview &
Compliance
Requirements



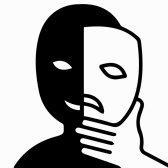
OJT Program
Regulatory
Authority



OJT Program
Overview &
Compliance
Requirements



BECO Connects



Reporting
DBE Fraud



Questions and
Resources



DBE Program Regulatory Authority



Disadvantaged
Business Program
Regulations



US Department of
Transportation



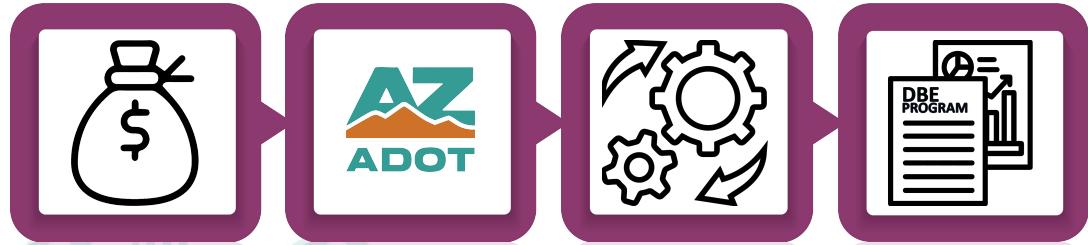
Civil Rights Act of
1964



CFR

Revised as of April 1, 2015

DBE Program Overview



49 CFR 26



ADOT DBE
Program Plan



ADOT DBE
Policy SUP-3.05
DBE



ADOT DBE
Specifications

DBE Program Objectives



Ensure
non-discrimination



Create a level
playing field

DBE Program Utilization

DBE
requirements
implemented
and DBE
utilization
tracked by:

BECO
reports
DBE
Utilization
semi-
annually to:

ADOT

BECO

FHWA

Field
Offices

Sub
recipients

FTA

FAA

ADOT Annual DBE Goal

**FHWA (Triennial) Goal FY
2024-2026
10/1/2023 to 9/30/2026**

**FTA and FAA (Triennial) Goal
FY 2025-2027
10/1/2024 to 9/30/2027**

FHWA

12.55%

FTA

9.85%*

*Pending agency
approval

FAA

9.72%*

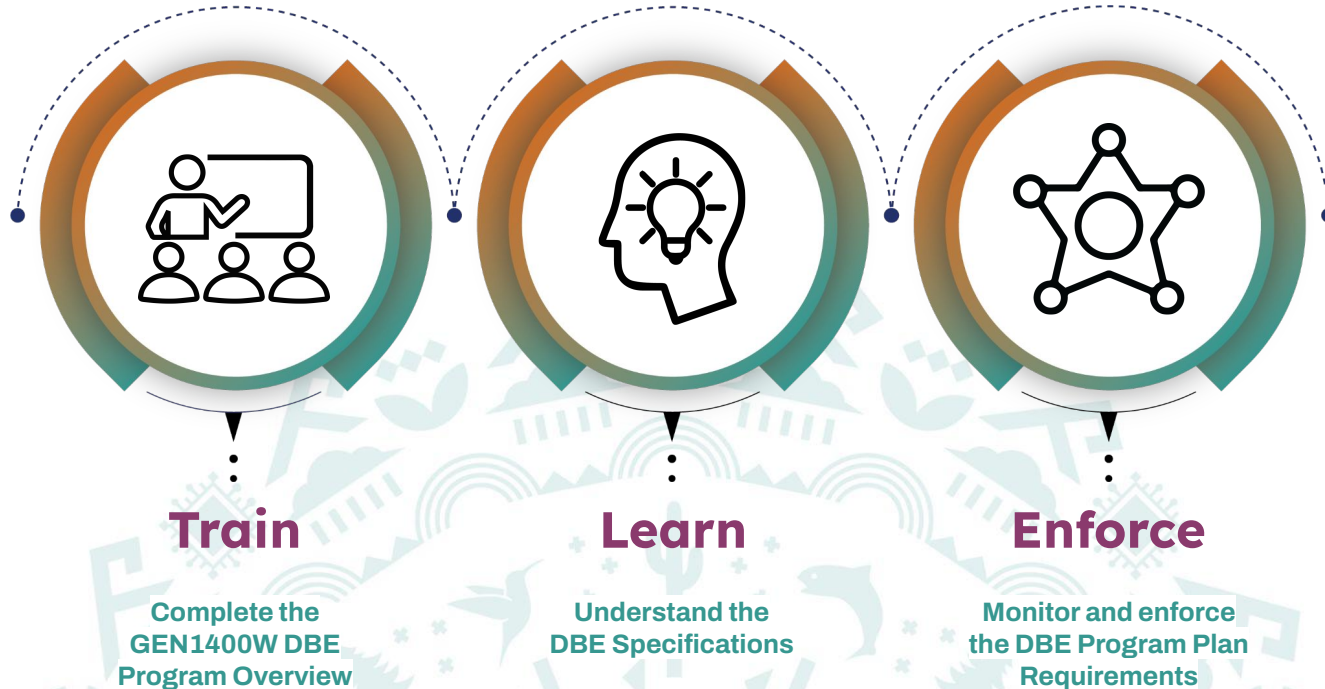
*Pending agency
approval

DBE Program Implementation

Lack of
Implementation of
the DBE Program
in Good Faith may
result in.....

... the ultimate
consequence:
Loss of Federal
Funding

DBE Program Conditions



DBE Compliance Requirements



DBE & OJT
Goal
Assessment



AZUTRACS
Registration



DBE
Affidavits/
GFE and
Bidders List



ADOT DBE
& OJT
Online
Reporting
System
(DOORS)



Payment
Reporting
and Prompt
Payment



DBE
Termination/
Substitution/
Reduction
(TSR)



Commercially
Useful
Function
(CUF)



Certification
of Final DBE
Payments
(COP)

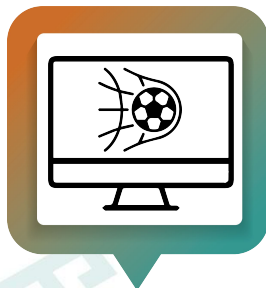


Meeting
DBE & OJT
Goal on the
contract

DBE & OJT Goal Assessments



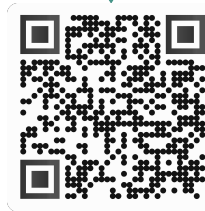
Mandatory for
all FHWA
projects (OJT
for construction
only)



ADOT DBE &
OJT Contract
Goal Setting
Application



User
Manual for
ADOT

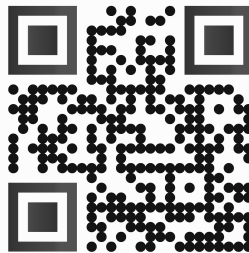


Email
DBE Contract
Goals

AZ UTRACS Registration

AZ UTRACS:
Arizona Unified
Transportation
Registration and
Certification System

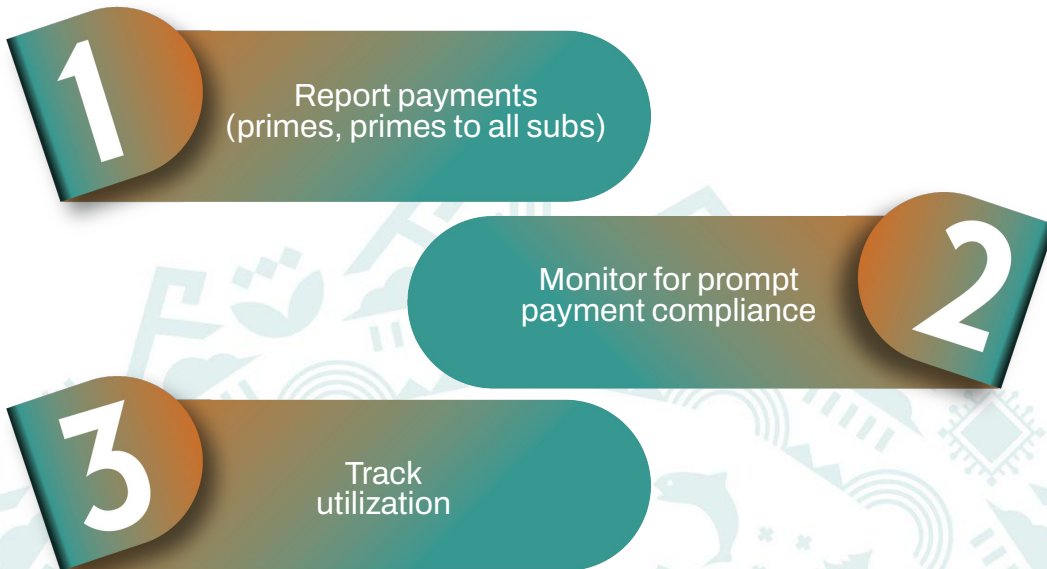
ALL primes and
subs, DBE and
non-DBE, must be
registered in
AZ UTRACS



AZ UTRACS

DOORS Contract Management

All federal contracts are managed for
DBE & OJT compliance



Prompt Payment

Payment Reporting



Prompt Payment



Payment Reporting



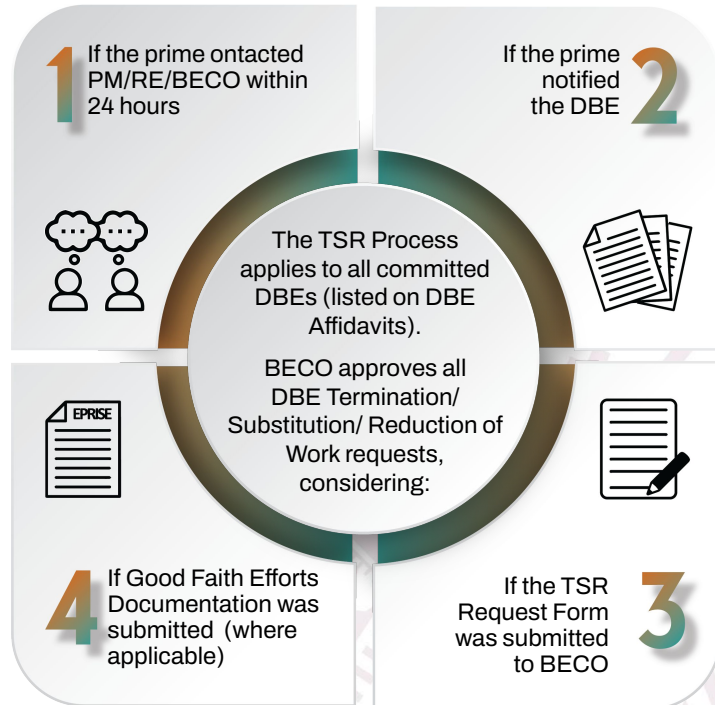
CONTRACTORS



SUBCONTRACTORS



Termination/Substitution/Reduction



Commercially Useful Function - CUF

BECO conducts
all CUF
determination:

Construction
Planning
Engineering/
Design

All CUF
Determinations
are recorded
in
DOORS

Certification of Final DBE Payment - COP

The COP certifies that the amount paid to the DBE counts towards DBE participation (DBE Goal)

Before signing the COP, please verify that the dollar amount listed on the COP matches the dollar amount paid

The COPs for each DBE are required for contract closeout. The DBE has 5 days to sign the form. ADOT may proceed without the DBE signature

Meeting the DBE Goal



Only payments made to race-conscious DBE(s) (DBEs on the DBE Affidavits) count towards the DBE Goal

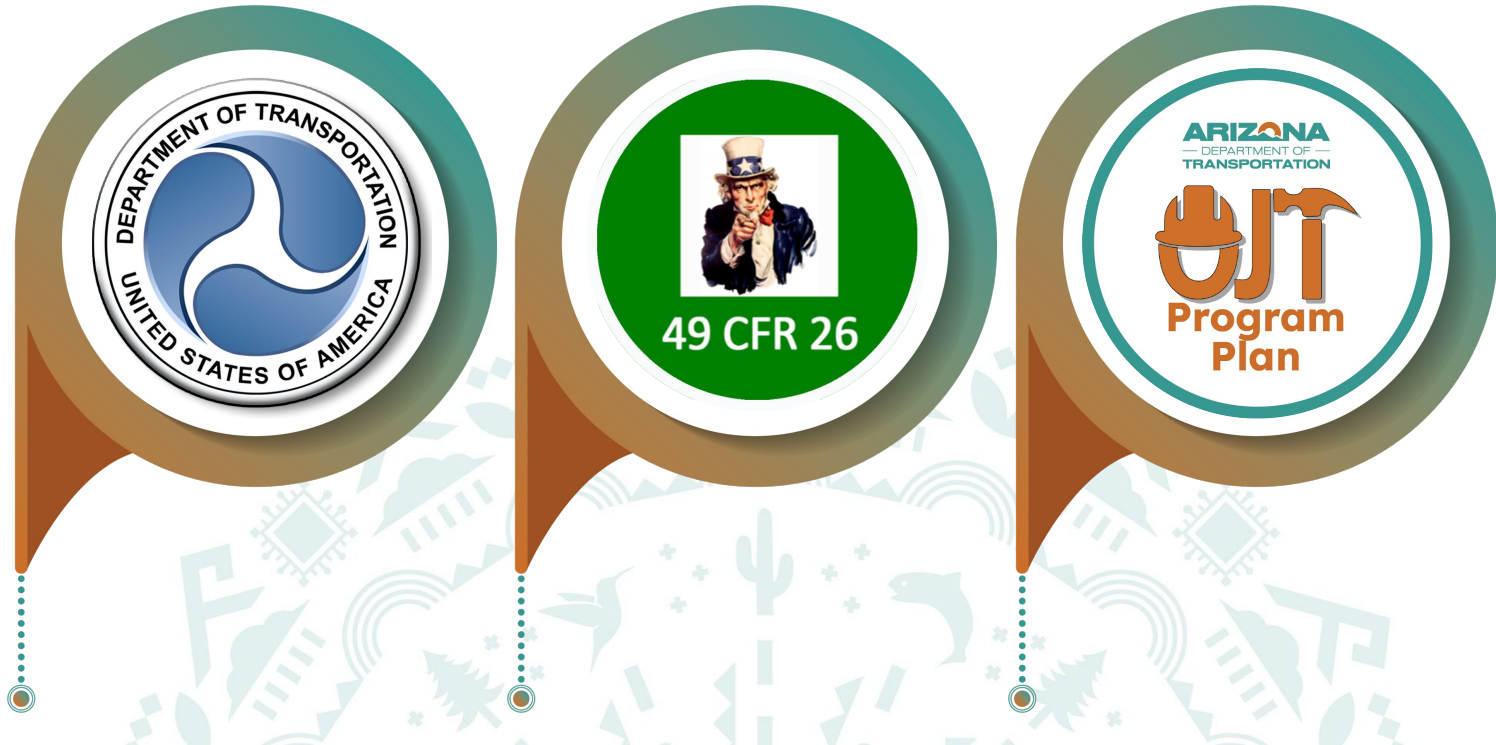


GFE is considered when determining if DBE Goal was met



BECO will confer with PM/RE if recommendation for sanctions are applicable

OJT Program Regulatory Authority



ADOT OJT Program

Applicable to all
ADOT FHWA funded
construction
projects

FHWA requires
that all OJT
results are
reported annually

All FHWA projects
must be assessed
for an OJT Goal
(not applicable to
LPA projects at this
time)

OJT Program Objectives

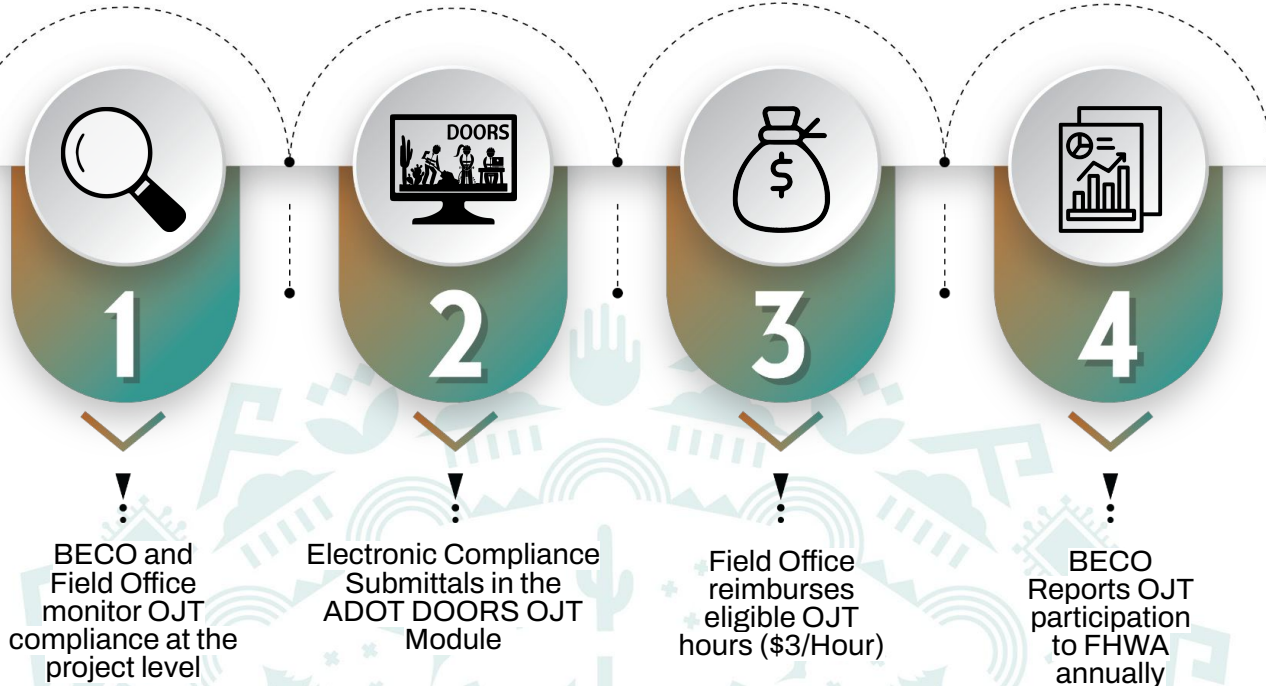


To offer equal opportunity for the training and upgrading of minorities, women and disadvantaged persons toward journeyman status in the highway construction trades.



To improve the skills of the available workforce for Arizona's Federally-funded highway construction projects

OJT Compliance Requirements



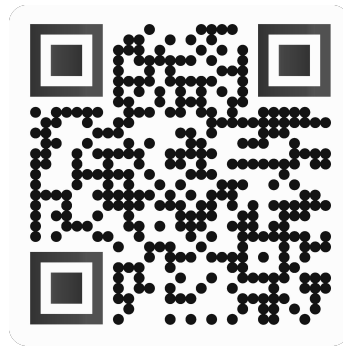
False, Fraudulent or Dishonest Conduct



Any appearance of fraud or dishonest conduct in working with DBEs must be reported

Contact the OIG Hotline

Call: 1-800-424-9071
(can be anonymous and/or confidential)



hotline@oig.dot.gov

Stay
Connected
with

BECO CONNECTS



brought to you by
ARIZONA
DEPARTMENT OF
TRANSPORTATION

ARIZONA
— DEPARTMENT OF —
TRANSPORTATION

Stay Connected with BECO Connects

The **B**usiness **E**ngagement and **C**ompliance **O**ffice is excited to connect with you! Please fill out the form with your contact information and select the program you're interested in. A team member will reach out within two business days!

mpeterson2@azdot.gov [Switch account](#)



* Indicates required question

Email *

Your email

First & Last Name *

Your answer

Company Name

BECO CONNECTS



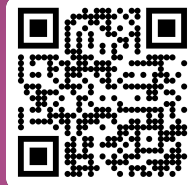
Compliance Links



AZUTRACS



ADOT DBE
Program Website



DOORS



ADOT DBE
Program Plan
2025 (Draft)



49 CFR Part 26



History of the
DOT Program



Federal Aid
Essentials Video
Library



USDOT
DBE
Program



DBE Affidavit
Training



DBE and Payment
Compliance
Overview

Contact Information



**GABE
DEMARBIEUX**

Contract Compliance and
Training Officer



[gdemarbiex@
azdot.gov](mailto:gdemarbiex@azdot.gov)



**CRISPINA
MATA**

DBE Compliance
Program
Manager



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**MELANIE
PETERSON**

Local Public Agency/
Subrecipient Program
Manager



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**STEVE
HALEY**

Alternative
Delivery
Projects Manager



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azdot.gov](mailto:shaley@azdot.gov)



**BECO
CONTRACTOR
COMPLIANCE
MAILBOX**



[Contractorcompliance
@azdot.gov](mailto:Contractorcompliance@azdot.gov)



**BECO LPA
CONTRACTOR
COMPLIANCE
MAILBOX**



[LPAcontractor
compliance@
azdot.gov](mailto:LPAcontractorcompliance@azdot.gov)

