



**FY 2015**

**DISADVANTAGED BUSINESS ENTERPRISE (DBE)**

**AND**

**AIRPORT CONCESSION DISADVANTAGED BUSINESS ENTERPRISE  
(ACDBE) PROGRAM**

**CERTIFICATION COMPLIANCE REVIEW REPORT**

**OF THE**

**OFFICE OF MINORITY AND WOMEN'S BUSINESS ENTERPRISES**

**(OMWBE)**

**OLYMPIA, WASHINGTON**

Report issued: March 26, 2015

Prepared by the

US Department of Transportation

Federal Aviation Administration

Civil Rights Office

# U.S. Department of Transportation Federal Aviation Administration

## CERTIFYING AGENCY COMPLIANCE REVIEW REPORT

### JURISDICTION AND AUTHORITIES

The Federal Aviation Administration (FAA) Office of Civil Rights is authorized by the Secretary of the U.S. Department of Transportation (DOT) to conduct civil rights compliance reviews. Reviews are undertaken to ensure compliance of applicants, recipients, and sub-recipients with 49 CFR, Part 26 Participation by Disadvantaged Business Enterprises in Department of Transportation Financial Assistance Programs and 49 CFR, Part 23 Participation by Disadvantaged Business Enterprises in Airport Concessions, referenced in this report as Part 26 and Part 23, respectively. Also, specific sections of the programs are referenced using the nomenclature (23.xx) and (26.xx)

### SCOPE OF REVIEW

The review process is a top-level examination of certifying agency's compliance with certification procedures. Unlike an audit where testing and extensive examination of records are normal procedures, the compliance review is designed where oversight funding is limited. A review provides a cost effective means of assessing an organization's general understanding and implementation of procedures to meet requirements. The primary purpose of the compliance review is to determine the extent to which the certifying agency has met its DBE certification program goals and objectives as required by regulation and guidance. This compliance review is intended to be a fact-finding process to: (1) examine the certifying agency's certification files, (2) make recommendations regarding corrective actions deemed necessary and appropriate, and (3) provide technical assistance.

With limited resources available for the review process, the breadth and depth of the examination in each area was restricted to what could be accomplished within the allotted review period. To improve the effectiveness of the review, FAA identified regulatory requirements prior to the review that had higher priorities in the review process. This compliance review is not to directly investigate whether there has been discrimination against disadvantaged businesses by the grant recipient or its sub-recipients, nor to adjudicate these issues in behalf of any party.

### REVIEW PROCESS

The review process began with an initial random selection of Sixty-five (65) certification files and certification application files; additional files were requested as needed. This review focused only on the files processed by this certifying agency. During a review, areas may receive more scrutiny as a result of information learned during the review. Also some areas may be examined in more detail based upon other information available to the FAA prior to and during the review. Interviews were held with certifying staff.

**City/State:** Olympia, Washington

**Certification Agency Staff:** Alexis Oliver, Director  
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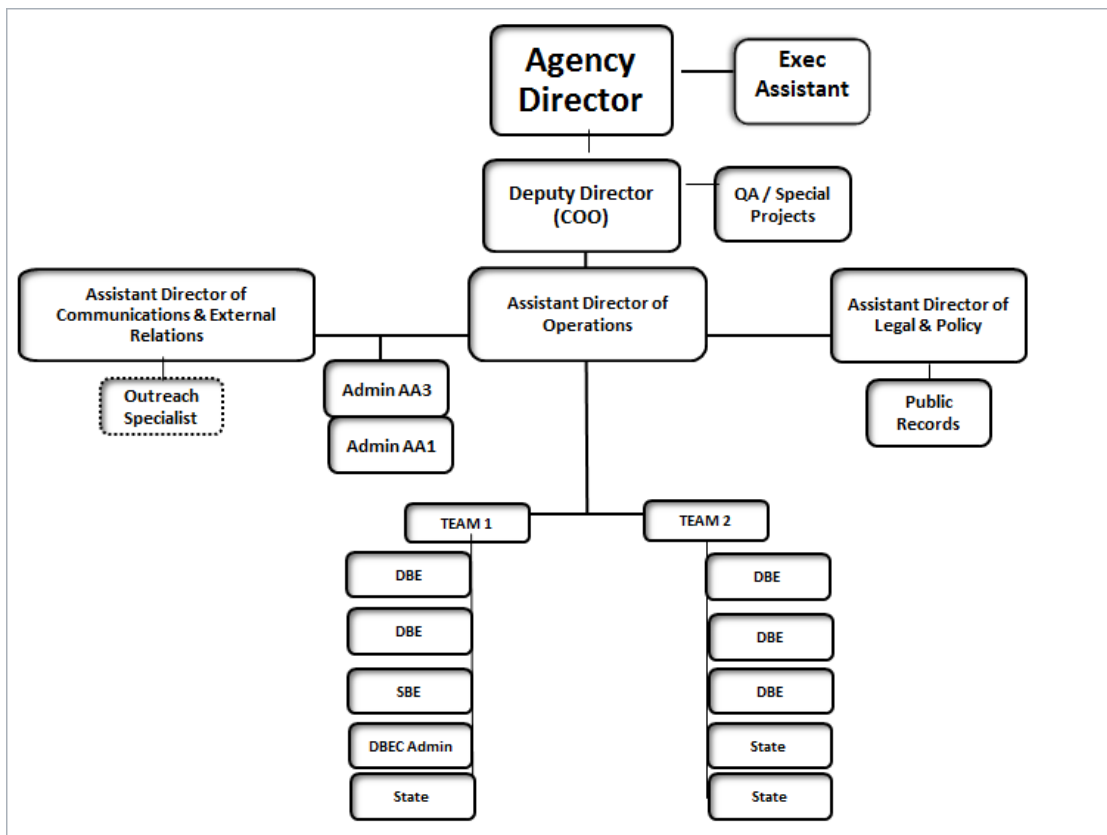
**Site Visit Date(s):** March 26, 2015

**FAA Staff Conducting the Review:** Ricky Watson, Lead Reviewer  
Keturah Pristell  
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## DESCRIPTION OF THE CERTIFYING AGENCY

Subpart E – Certification Procedures of 49 CFR Part 26.81 requires DOT recipients to participate in a state Unified Certification Program (UCP) that shall provide “one-stop shopping” to applicants for DBE certification. The Office of Minority and Women’s Business Enterprise (OMWBE) is the State of Washington’s sole UCP. As a certifying agency, OMWBE’s staff is dedicated to certification, application and file maintenance, and policy/internal process development.

### 2014 Organizational Chart



After OMWBE certify firms as qualify DBE firms or ACDBE firms, these firms are eligible to count on transportation specific Federal projects including construction work on rails, roads, bridges, airports, and seaports. DBE certification is specifically for those firms that perform transportation related scopes of work funded by the US Department of Transportation (USDOT), and its transportation modes, including the Federal Highway Administration, (FHWA), Federal Aviation Administration (FAA), and Federal Transit Administration (FTA). ACDBE certification is primarily for those that are engaged in the sale of consumer goods or services to the public.

### Distribution of State and Federal Certified Firms

In Washington State, there are 2,199 certified firms. OMWBE has certified firms in 33 of the 39 counties in the State. The map in Figure 3 shows the distribution of certified firms across the 39 counties.



### Out-of-State Certified Firms

In addition to the certified firms located in Washington State, OMWBE has certified 226 out-of-state based firms. These 226 firms include firms certified in either the state or Federal program. The majority of OMWBE's out-of-state firms are located in Oregon.

## FINDINGS PART I - PROCESS REVIEW

### 1. Uniform Application

**Requirement:** UCPs and their certifying agencies are required to use the Certification Application found in Appendix F of the regulation without change.

**Regulation Reference:** 26.83(c)(1)(viii) and 26.83(c)(2)

(viii) Require potential DBEs to complete and submit an appropriate application form except as otherwise provided in §26.85 of this part (Interstate certification).

(2) You must use the application form provided in Appendix F to this part without change or revision. However, you may provide in your DBE program, with the written approval of the concerned operating administration, for supplementing the form by requesting specified additional information consistent with this part.

**Findings:** During Certification Compliance Review, no deficiencies were found with the requirements for using the Uniform Certification Application Form in Appendix F.

On November 4, 2014, after the USDOT issued a final rule amending its DBE program (49 CFR Part 26), OMWBE implemented the use of the uniform certification application and reporting forms. The uniform personal net worth form is now also being use by applicant owners in accordance with USDOT 's surface transportation reauthorization, Moving Ahead for Progress in the 21st Century Act (MAP-21).

**Corrective Action:** None Required

### 2. Processing of Applications

**Requirement:** A certification decision must be made within 90 days of receipt of all information. A one-time 60-day extension may be exercised upon written notice to the firm, explaining the reason for the extension.

**Regulation reference:** 49 CFR 26.83 (k)

(k) If you are a recipient, you must make decisions on applications for certification within 90 days of receiving from the applicant firm all information required under this part. You may extend this time period once, for no more than an additional 60 days, upon written notice to the firm, explaining fully and specifically the reasons for the extension. You may establish a different time frame in your DBE program, upon a showing that this time frame is not feasible, and subject to the approval of the concerned operating administration. Your failure to make a decision by the applicable deadline under this paragraph is deemed a constructive denial of the application, on the basis of which the firm may appeal to DOT under §26.89.

**Findings:** During Certification Compliance Review, no deficiencies were found with the requirements to process federal applications with 90 days. Of the files reviewed by the FAA compliance team, the average process time for a new application was 32 days after all required documentation was received by OMWBE.

OMWBE has strived to complete new application processing with quality and timeliness. OMWBE is committed to complete new Federal applications within 90 days and Federal out-of-state new applications within 60 days. The timeframe to process new applications does not begin until OMWBE is in receipt of a complete application with all necessary supporting documentation.

**Corrective Action: None Required**

### 3. Annual Updates

**Requirement:** Firms must submit an annual affidavit (on the anniversary of their certification) affirming that there has been no change in circumstances that would affect the firm's ability to meet size, disadvantaged status, ownership, or control requirements of the regulation. Supporting documentation of the firm's gross receipts must be submitted with the affidavit.

**Regulation reference:** 49 CFR 26.83

(j) If you are a DBE, you must provide to the recipient, every year on the anniversary of the date of your certification, an affidavit sworn to by the firm's owners before a person who is authorized by state law to administer oaths or an unsworn declaration executed under penalty of perjury of the laws of the United States. This affidavit must affirm that there have been no changes in the firm's circumstances affecting its ability to meet size, disadvantaged status, ownership, or control requirements of this part or any material changes in the information provided in its application form, except for changes about which you have notified the recipient under paragraph (i) of this section. The affidavit shall specifically affirm that your firm continues to meet SBA business size criteria and the overall gross receipts cap of this part, documenting this affirmation with supporting documentation of your firm's size and gross receipts. If you fail to provide this affidavit in a timely manner, you will be deemed to have failed to cooperate under §26.109(c).

**Findings:** OMWBE stated that until November 2014, the agency had requested certified DBE/ACDBE firms to submit personal income tax records during Annual Updates. OMWBE has re-trained its certifiers to only request the annual affidavit and business tax returns for the certified firm in accordance with §26.83.

**Corrective Action:** OMWBE Quality Assurance Specialists should verify that only the annual affidavit and business tax returns for the certified firm are requested during annual updates.

### 4. Certification reviews:

**Requirement:** The agency may NOT require applicants to periodically reapply for certification or complete an application for "recertification." Agencies may conduct a certification review that includes a new on-site visit to the certified firm business location whenever there is a change in the firm's circumstances that may affect certification eligibility.

**Regulation Reference:** 49 CFR 26.83

(h) (1) Once you have certified a DBE, it shall remain certified until and unless you have removed its certification, in whole or in part, through the procedures of section 26.87. (2) You may not require DBEs to reapply for certification or undergo a recertification process. However, you may conduct a certification review of a certified DBE firm, including a new on-site review, if appropriate in light of

changed circumstances (e.g., of the kind requiring notice under paragraph (i) of this section or relating to suspension of certification under §26.88), a complaint, or other information concerning the firm's eligibility. If information comes to your attention that leads you to question the firm's eligibility, you may conduct an on-site review on an unannounced basis, at the firm's offices and job sites.

**Findings:** No deficiencies were found with this requirement. OMWBE has established a three-year cycle to conduct DBE/ACDBE certification reviews to include a new on-site review as allowed by the regulations. OMWBE staff has a clear understanding of the process for DBE/ACDBE certification reviews.

**Corrective Action: None Required**

## 5. Confidentiality

**Requirement:** Proprietary information contained in the certification file must be kept confidential. The location and security of files is an important component in safeguarding information submitted for purposes of certification.

**Regulation reference:** 49 CFR 26.83 (g)

(g) You must safeguard from disclosure to unauthorized persons information gathered as part of the certification process that may reasonably be regarded as proprietary or other confidential business information consistent with applicable Federal, state, and local law.

**Findings:** No deficiencies were found with requirements for OMWBE to maintain confidential records. OMWBE has developed an electronic database for maintaining all certified files to include DBE/ACDBE firms. The system is password protected and requires users to be granted authorization at different administrative “rights” levels to use the system based on position within the organization.

OMWBE’s standing policy is to upload all original paper application documents to the electronic system within 24 to 48 hours upon receipt. The hard copies are destroyed after a firm has received its certification. In the case of a denial, the firm’s original files are destroyed after the appeal period.

**Corrective Action: None Required**

## 6. Site Visit

**Requirement:** An on-site visit must be conducted at the applicant’s place of business and job sites if there are any in the local area. For interstate certification, the home state on-site must be obtained if the agency is not accepting the home state certification without further procedures. If the agency is accepting the home state certification without further procedures, the agency is not required to obtain the home state site visit.

**Regulation reference:** 49 CFR 26.83 (c)(1)(i)

((i) Perform an on-site visit to the firm's principal place of business. You must interview the principal officers and review their résumés and/or work histories. You may interview key personnel of the firm if necessary. You must also perform an on-site visit to job sites if there are such sites on which the firm is working at the time of the eligibility investigation in your jurisdiction or local area. You may rely upon the site visit report of any other recipient with respect to a firm applying for certification.

**Findings:** No deficiencies were found with requirements for the agency to conduct on-site visits, review résumés and interview key personnel. OMWBE has established a three-year cycle to conduct new on-site reviews for DBE/ACDBE firms.

All files review during the FAA's certification review reflected that on-site visits were being conducted in a timely manner.

**Corrective Action:** None Required

## 7. Denials

**Requirement:** Firms being denied certification must be provided with a written explanation of the reasons for denial. Evidence from the record supporting the reason must be referenced. Documents and information on which the denial is based must be provided to the applicant upon request.

**Regulation reference:** 49 CFR 26.86

(a) When you deny a new firms certification application for certification as a DBE, you must provide the firm a written explanation of the reasons for the denial, specifically referencing the evidence in the record that supports each reason for the denial. All documents and other information on which the denial is based must be made available to the applicant, upon request.

**Findings:** No deficiencies were found with requirements for the agency to provide applicant firms with a written explanation of the reasons for denial. The denial files reviewed reflects that OMWBE provides the applicants with written explanation for the reason(s) for denial. The written explanations reviewed were detailed and also provided the references to the section(s) of the 49 CFR Part 26 regulations which further clarified the cause for denial. OMWBE has designed its denial letters to include information on the USDOT's appeal process for applicants.

**Corrective Action:** None Required

## 8. Certification Removal

**Requirement:** The certification of a firm may be removed if the agency determines that there is reasonable cause to believe that the firm is ineligible. Written notice providing the reasons and allowing the firm an opportunity to have an informal hearing must be given. Procedures detailed in 26.87 must be followed before removing a firm's eligibility.

**Regulation reference:** 49 CFR 26.87



If a UCP (certifying agency) determines that there is reasonable cause to believe that a currently certified firm is ineligible, the certifying agency reviews the record to determine whether there is reasonable cause to remove the firm's eligibility. The agency must provide written notice to the firm it proposes is ineligible setting forth the reasons for the proposed determination and follow a specific process.

**Findings:** During the FAA 2015 compliance review there no removal files were reviewed.

**Corrective Action:** None Required

## 9. Interstate Certification

**Requirement:** If an agency accepts the certification of another state without further procedure, the agency must confirm the firm's certification in its home state. If an agency chooses not to accept the certification from another state, the state may review the information submitted to the firm's home state. An agency may not require firms that are certified in their home state to complete a new application or submit additional documentation not requested by the home state.

**Regulation reference:** 49 CFR 26.85

(a) This section applies with respect to any firm that is currently certified in its home state.

(b) When a firm currently certified in its home state ("State A") applies to another State ("State B") for DBE certification, State B may, at its discretion, accept State A's certification and certify the firm, without further procedures.

(1) To obtain certification in this manner, the firm must provide to State B a copy of its certification notice from State A.

(2) Before certifying the firm, State B must confirm that the firm has a current valid certification from State A. State B can do so by reviewing State A's electronic directory or obtaining written confirmation from State A.

(c) In any situation in which State B chooses not to accept State A's certification of a firm as provided in paragraph (b) of this section, as the applicant firm you must provide the information in paragraphs (c)(1) through (4) of this section to State B.

**Findings:** No deficiencies were found with requirements of OMWBE concerning processing interstate certification. OMWBE has elected to accept the certification from another state; however, the process time is frequently delayed due to nonresponse from home states. The average processing time of the interstate certifications is 180 days from start to finish. The average written decision to interstate applicants is two weeks after OMWBE received all required documentation from the home state.

**Corrective Action:** The OMWBE Certifiers should be instructed when and how to notify the OMWBE Director and/or Deputy Director when other states' UCPs are not providing a timely response to the inquiries for an interstate application. The director of OMWBE should try to establish a working relationship with other state UCP agencies in order to remove the delay in the response time regarding interstate certification applications.

## FINDINGS PART II - APPLICATION FILE REVIEWS

### 1. Reviewing Social Disadvantage (Notarized Statement)

**Requirement:** Each disadvantaged individual upon whom the certification is based must submit the standard Affidavit of Certification. The firm must be signed and notarized. If there is a well-founded reason to question an individual's membership in one of the presumed disadvantaged groups, additional evidence must be required.

**Regulation reference:** 49 CFR 26.63(a)(1)

If, after reviewing the signed notarized statement of membership in a presumptively disadvantaged group (see §26.61(c)), you have a well founded reason to question the individual's claim of membership in that group, you must require the individual to present additional evidence that he or she is in fact a member of the group.

**Findings:** During Certification Compliance Review, no deficiencies were found with the requirement of individual determinations. The OMWBE certifying staff was familiar with requirements regarding individual determinations of social. No certification files reviewed were from individuals not presumed to be socially and economically disadvantaged.

**Corrective Action:** None Required

### 2. Review Size Standard

**Requirement:** For DBE applicants, to be considered a small business, firms must meet the SBA size standard applicable to the type of work they perform. The type of work must be defined by the narrowest NAICS code available to describe the firm's work. In addition, no firm may exceed the overall size cap of \$23.98 million (average annual gross receipts over a three-year period).

For ACDBE applicants: To be considered a small business, firms must meet the size standard from the regulation applicable to the type of work they perform. The agency must also assign an NAICS code to identify the type of work for which the firm is certified. The narrowest NAICS code available to describe the firm's work should be used.

**Regulation References:**

49 CFR 26.65

(a) As a recipient, you must apply current SBA business size standard(s) found in 13 CFR part 121 appropriate to the type(s) of work the firm seeks to perform in DOT-assisted contracts, including the primary industry classification of the applicant.

(b) Even if it meets the requirements of paragraph (a) of this section, a firm is not an eligible DBE in any Federal fiscal year if the firm (including its affiliates) has had average annual gross receipts, as defined by SBA regulations (see 13 CFR 121.402), over the firm's previous three fiscal years, in excess of \$23.98 million.

49 CFR 23.33

(a) As a recipient, you must, except as provided in paragraph (b) of this section, treat a firm as a small business eligible to be certified as an ACDBE if its gross receipts, averaged over the firm's previous three fiscal years, do not exceed \$56.42 million.

(b) The following types of businesses have size standards that differ from the standard set forth in paragraph (a) of this section:

(1) *Banks and financial institutions*: \$1 billion in assets;

(2) *Car rental companies*: \$75.23 million average annual gross receipts over the firm's three previous fiscal years, as adjusted by the Department for inflation every two years from April 3, 2009.

(3) *Pay telephones*: 1,500 employees;

(4) *Automobile dealers*: 350 employees.

**Findings:** No deficiencies were found with the requirement of individual size standard determinations. The OMWBE certifying staff was familiar with requirements regarding DBE and ACDBE firms meeting the required size standards. No certification files reviewed were determined that a DBE or ACDBE failed to meet the size standard accordance to 49 CFR Section 26.65 or 49 CFR Section 23.33.

**Corrective Action:** None Required

### 3. Review Economic Disadvantage

**Requirement:** Each disadvantaged individual relied upon for certification must submit a Statement of Personal Net Worth. Additional reasonable documentation may be requested on a case-by-case basis. The PNW Statement must be signed and notarized. The form should be properly completed and the math should be correct.

**Regulation reference:** 49 CFR 26.67 (a)(2)(ii)

You must require each individual who makes this certification to support it with a signed, notarized statement of personal net worth, with appropriate supporting documentation. To meet this requirement, you must use the DOT personal net worth form provided in appendix G to this part without change or revision. Where necessary to accurately determine an individual's personal net worth you may, on a case-by-case basis, require additional financial information from the owner of an applicant firm (e.g., information concerning the assets of the owner's spouse, where needed to clarify whether assets have been transferred to the spouse or when the owner's spouse is involved in the operation of the company). Requests for additional information shall not be unduly burdensome or intrusive.

**Findings:** No deficiencies were found with the requirement of individual determinations. The OMWBE certifying staff was familiar with requirements regarding individual determinations of economic disadvantage. No certification files reviewed were from individuals not presumed to be socially and economically disadvantaged.

**Corrective Action:** None Required

#### 4. **Review Ownership**

Requirement: Agencies must verify that a firm is 51% owned by disadvantaged individuals. The ownership must be real, substantial and continuing. The review should encompass the following:

- Did the agency verify that a disadvantaged individual(s) is a 51% owner? If a corporation, is 51% of each stock type owned by the disadvantaged individual. In a partnership, 51% of each class of partnership interest, in an LLC, each class of membership. Is the ownership properly documented?
- Did the agency verify capital contributions, including the source and if the ownership is real, substantial and continuing? (i.e. was the contribution sufficient in light of the value of the company, was the investment returned, have loans been paid on schedule, etc.?).
- Was ownership gifted or funded through a gift from a non-disadvantaged individual who has ownership in the firm or is in a related business?
- Were marital assets used to acquire ownership or is the state a community interest state? If so, did a non-disadvantaged spouse renounce ownership in the form to the degree that the disadvantaged owner actually owns 51%
- Do the disadvantaged owners enjoy the customary incidents of ownership?
- Do the disadvantaged owners share in the risks and profits commensurate with their ownership interests?
- Review bank loans, living trusts, wills, lines of credit, loan agreements, bank signature cards, etc. for red flags. Were these caught and explained by the agency, if necessary?
- Was expertise is relied upon as part of a disadvantaged owner's contribution to acquire ownership? If so, is the expertise all of the following: In a specialized field; Of outstanding quality; In areas critical to the firm's operations; Indispensable to the firm's potential success; Specific to the type of work the firm performs; and Documented in the records of the firm. In addition, does the individual whose expertise is relied upon must have a significant financial investment in the firm?

Regulation reference: 49 CFR 26.69

(a) In determining whether the socially and economically disadvantaged participants in a firm own the firm, you must consider all the facts in the record viewed as a whole, including the origin of all assets and how and when they were used in obtaining the firm. All transactions for the establishment and ownership (or transfer of ownership) must be in the normal course of business, reflecting commercial and arms-length practices.

(b) To be an eligible DBE, a firm must be at least 51% owned by socially and economically disadvantaged individuals

**Findings:** No deficiencies were found with the requirement of individual determinations. The OMWBE certifying staff was familiar with requirements regarding individual determination the 51% ownership of the applicant. No certification files reviewed determined that the disadvantaged owner(s) did not maintain at less 51% ownership in his/her firm.

**Corrective Action:** None Required

#### 4. **Review Control**

**Requirement:** Agencies must verify that a firm is independent and that the firm is controlled by one of the disadvantaged owners. The review should encompass the following:

- Review Company documents (i.e. by-laws, operating agreement, etc.) for any restrictions that limit the customary discretion of the disadvantaged owner(s).
- Verify disadvantaged owner(s) possess the power to direct the firm in terms of day-to-day and long-term decisions.
- Verify disadvantaged owner holds the highest officer position in the firm and controls the board.
- Disadvantaged owners, managers or employees of the firm may be involved in a DBE firm, but cannot control it or be disproportionately responsible for the firm's operation. Control of the firm and decisions to be made regarding the firm must lie in the hands of the disadvantaged owner(s).
- Delegations of authority – Authority may be delegated to others, but must be revocable. Disadvantaged owner(s) must retain the power to hire/fire any individual to whom such authority is delegated?
- Resumes - The disadvantaged owner(s) must have an understanding of and managerial and technical competence and experience directly related to the firm's business. Understanding the type of business in which a firm is engaged is key to controlling the firm.
- Professional License – If state or local law requirement is that owners have a particular license or credential to own and/or control a firm, the disadvantaged owner(s) must possess the required license or credential.
- Salaries & Benefits – Review differences between the disadvantaged owner(s) and other persons involved in the firm, consideration should be made for duties, normal industry practice, the firm's policy and practice with regard to reinvestment, etc.
- Outside Employment - The disadvantaged individual controlling the firm cannot engage in outside employment or other business interests that conflict with the management of the firm or prevent the individual from devoting sufficient time to the firm's affairs.
- Non-disadvantaged family members participating in the firm - The disadvantaged owner(s) have the burden of proving that they, as distinct from the family as a whole, control the firm.
- Has there been a transfer or ownership from a non-disadvantaged owner? If so, does the non-disadvantaged owner remain involved? There is a higher burden of proof, "clear and convincing evidence" that the disadvantage owner controls the firm in such a case.
- Equipment – Is the equipment owned or leased? Is the leasing of equipment normal industry practice? Does the leasing of equipment involve a relationship with a prime contractor or other party compromising independence?
- Assignment of NAICS codes - Do the disadvantaged owners have the ability to control the firm the specific types of work in which it is seeking to be certified?
- In a partnership - Do non-disadvantaged individuals have the power to contractually bind the partnership without the written concurrence of the owner?
- An employee leasing company may be used by a firm; however the disadvantaged individual must maintain an employer-employee relationship.

- Review relationships with non-DBE firms in such areas as personnel, facilities, equipment, financial and/or bonding support, and other resources.

**Regulation reference:** 49 CFR 26.71

(a) In determining whether socially and economically disadvantaged owners control a firm, you must consider all the facts in the record, viewed as a whole.

(b) Only an independent business may be certified as a DBE. An independent business is one the viability of which does not depend on its relationship with another firm or firms.

**Findings:** No deficiencies were found with the requirement of reviewing Control. The OMWBE certifying staff has a clear understanding of the requirements that the individual has independent control of the firm; there are no restrictions in the operation of his/her firm; there is no outside employment or other business interests that conflict with the management of the firm; and the certifiers review relationships between the individual minority (applicant) and non-DBE firms.

**Corrective Action:** None Required

## FILES REVIEWED

### CERTIFICATION (OMWBE is Washington UCP agency)

File Name	File Type	Business Type	DOT App	Social Disadv, Review (Affidavit)	Economic Disadv, (PNW Statement)	Size Std Review	Ownership Review	Control Review	Independence Review	Annual Update (Affidavit)	Site Visit	Processed within 90 Days	DBE Directory (Certification #)	Denial Letter
File #1 <i>Backdraft LLC - ACDBE</i>	EC	LLC	NO	Y	I	Y	Y	Y	Y	5/7/14	Y	24 days	D2F00 18540	N/A
File #2 <i>Blackstar Services - DBE</i>	NC	CORP	Y	Y	Y	Y	Y	Y	Y	N/A	Y	75 days	D1M00 23517	N/A
File #3 <i>Black Hills Excavating - DBE</i>	NC	CORP	Y	Y	I	Y	Y	Y	y	N/A	Y	14 days	D4M00 23324	N/A
File #4 <i>Taylor Transport - DBE</i>	NC	CORP	Y	Y	I	Y	Y	Y	Y	N/A	Y	67 days	D2F00 23456	N/A

### CERTIFICATION DENIALS OF INITIAL REQUESTS (§26.86)

File Name	File Type	Business Type	DOT App	Social Disadv, Review (Affidavit)	Economic Disadv, (PNW Statement)	Size Std Review	Ownership Review	Control Review	Independence Review	Annual Update (Affidavit)	Site Visit	Processed within 90 Days	Requests for Clarification	Denial Letter
File #1 <i>Cokamar Trucking - DBE</i>	NC	LLC	Y	N	Y	Y	Y	N	Y	N/A	Y	89 days	N	3/28/14
File #2 <i>Salinas Construction - DBE</i>	NC	CORP	Y	Y	Y	Y	Y	N	Y	N/A	Y	120 days	Y	5/28/13

### INTERSTATE CERTIFICATION (§26.85)

File Name	File Type	Business Type	Home State Cert Notice	Verification of State A Cert	Annual Update (Affidavit)	Site Visit Requested (7 days)	Notice to Applicant (w/in 60 days)	Notice to Firm of any Good Cause Cert Issues	Written Decision to Firm's Written Response (30 days)	Processed within 90 Days	Added to DBE Directory (Cert. #)	Denial Letter
File #1 <i>Ankit, LLC - ACDBE</i>	AC	LLC	FL	Y	N/A	Y	Y	Y	15 days	180 days	D6M00 23500	N/A
File #2 <i>Mission Yogurt, Inc - ACDBE</i>	AC	CORP	CO	Y	N/A	Y	Y	Y	180 days	180 days	D5F00 23323	N/A

**CERTIFICATION REMOVAL OF ELIGIBILITY (§26.87)**

File Name	File Type	Business Type	Notice to Firm	Hearing	Removal Letter	DBE Directory Removal
File #1 <i>Name</i> <i>DBE or ACDBE</i>	N/A					

File Type: NC = New Certification (<1 year)      EC = Existing Certification (>1 year)      CD = Certification Denial

Findings: ND = No Deficiency Identified      D = Deficient      N/A = Not applicable      I = Incomplete      NR = Not Reviewed

Business Type/Structure: LLC = Limited Liability Corporation      SP = Sole Proprietorship      P = Partnership      CC = C-Corporation      SC = S-Corporation