

CITY OF CHICAGO

MIDWAY INTERNATIONAL AIRPORT DISADVANTAGED BUSINESS ENTERPRISE (DBE) METHODOLOGY AND GOAL FY 2026 – FY 2028

FOR FEDERAL AVIATION ADMINISTRATION (FAA)

Table of Contents

l.	Summary	4
II.	DBE Goal-Setting Methodology	4
III.	Step 1: Determination of Base Figure for Relative DBE Availability	4
IV.	Step 2: Adjustment to Base Figure	. 11
V.	Use of Race-Neutral Methods and DBE Contract Goals	. 14
VI.	Good Faith Efforts	. 15
VII.	Public Notice of Goal	. 16

List of Tables

able 1: FAA-Assisted Projects, FY 2026-2028	4
able 2: NAICS Codes and Descriptions for Anticipated Projects, FY 2026-2028	5
able 3: Anticipated FAA-Assisted Projects, FY 2026-2028	6
able 4: Anticipated FAA-Assisted Projects Classified by NAICS Codes, FY 2026-2028	7
able 5: Relative DBE Availability	9
able 6: Weighted DBE Availability	10
able 3.1: Anticipated FAA-Assisted Projects, Excluding Airfield Projects, FY 2026-2028	11
Table 4.1: Anticipated FAA-Assisted Projects by NAICS Codes, Excluding Airfield Projects FY 2026-2028	-
able 6.1: Weighted DBE Availability, Non-Airfield Projects	13
able 7: DBE Participation and Race-Neutral DBE Participation, FY 2022-2024	13
able 8: Step 2 Goal Adjustment	14

I. Summary

The City of Chicago has prepared this document to describe our methodology in establishing an overall Disadvantaged Business Enterprise (DBE) goal of **21.55**% for projects at Midway International Airport funded in whole or in part by the Federal Aviation Administration (FAA) in fiscal years 2026 – 2028. The methodology adheres to the two-step process required by 49 CFR 26.45 and utilizes data from the Illinois Unified Certification Program (UCP) Directory and U.S. Census Bureau's County Business Patterns (CBP) program.

II. DBE Goal-Setting Methodology

The City of Chicago has followed the two-step goal-setting process outlined in 49 CFR 26.45 to set our FY 2026-2028 overall DBE goal for Midway International Airport.

The local market for FAA-assisted contracts comprises firms across the six counties of Cook, DuPage, Kane, Lake, McHenry, and Will in northeastern Illinois.

To determine a base figure for the relative availability of DBEs (Step 1), we utilize the Illinois Unified Certification Program Directory to obtain the number of DBEs and the U.S. Census Bureau's County Business Patterns data series to obtain the number of all firms in the local market by North American Industry Classification System (NAICS) code; and divide the number of DBEs by the number of all firms. We further weight DBE availability by the value of FAA-assisted projects in each NAICS code.

We adjust the base figure for relative availability (Step 2) based on (a) the likelihood of 0% contract DBE goals on airfield projects due to the preliminary injunction against the DBE program issued on September 23, 2024; and (b) past DBE participation on FAA-assisted projects at Midway.

III. Step 1: Determination of Base Figure for Relative DBE Availability

Table 1 outlines the anticipated value of FAA-assisted projects in fiscal years 2026, 2027, and 2028. The anticipated projects will comprise work in the NAICS codes in Table 2.

Table 1: FAA-Assisted Projects, FY 2026-2028

FAA Fiscal Year	Value of FAA-Assisted Projects
2026	\$ 41,566,552
2027	\$ 53,390,650
2028	\$ 200,559,224
Total	\$ 295,516,426

Table 2: NAICS Codes and Descriptions for Anticipated Projects, FY 2026-2028

Table 2. NAICS Codes and Descriptions for Anticipated Projects, F1 2020-2020
236220 - Commercial and Institutional Building Construction
237110 - Water and Sewer Line and Related Structures Construction
237130 - Power and Communication Line and Related Structures Construction
237310 - Highway, Street, and Bridge Construction
237990 - Other Heavy and Civil Engineering Construction
238110 - Poured Concrete Foundation and Structure Contractors
238210 - Electrical Contractors and Other Wiring Installation Contractors
238220 - Plumbing, Heating, and Air-Conditioning Contractors
238320 - Painting and Wall Covering Contractors
238350 - Finish Carpentry Contractors
238910 - Site Preparation Contractors
238990 - All Other Specialty Trade Contractors
484220 - Specialized Freight (except Used Goods) Trucking, Local
541330 - Engineering Services
541360 - Geophysical Surveying and Mapping Services
541380 - Testing Laboratories and Services
541512 - Computer Systems Design Services
561730 - Landscaping Services
561990 - All Other Support Services

The 9 projects anticipated in FY 2026-2028 are identified in Table 3, along with their project values. In Table 4, we classify the project values by NAICS code to determine the appropriate weight for each NAICS code in Table 6.

Table 3: Anticipated FAA-Assisted Projects, FY 2026-2028

FAA-Assisted Project	Project Value
Midway Central Terminal Pad	\$ 128,000,000
Midway Multimodal Connectivity and Accessibility	\$ 17,047,028
Restroom Accessibility Expansion and Rehabilitation	\$ 22,559,224
RSIP Midway Phase 16A	\$ 9,486,334
RSIP Midway Phase 16B	\$ 10,080,218
RSIP Midway Phase 16C	\$ 17,154,732
RSIP Midway Phase 16D	\$ 19,188,890
Runway 4R-22L Rehabilitation	\$ 50,000,000
Taxiway Y South	\$ 22,000,000
Total	\$ 295,516,426

Table 4: Anticipated FAA-Assisted Projects Classified by NAICS Codes, FY 2026-2028

FAA-Assisted Project by NAICS Code	Project Value by NAICS
236220 - Commercial and Institutional Building Construction	\$ 10,101,266
RSIP Midway Phase 16A	\$ 421,627
RSIP Midway Phase 16B	\$ 448,023
RSIP Midway Phase 16C	\$ 762,454
RSIP Midway Phase 16D	\$ 852,864
Runway 4R-22L Rehabilitation	\$ 7,616,298
237110 - Water and Sewer Line and Related Structures Construction	\$ 4,133,130
Runway 4R-22L Rehabilitation	\$ 2,153,130
Taxiway Y South	\$1,980,000
237130 - Power and Communication Line and Related Structures Construction	\$ 220,000
Taxiway Y South	\$ 220,000
237310 - Highway, Street, and Bridge Construction	\$ 84,585,819
Midway Central Terminal Pad	\$ 64,000,000
Midway Multimodal Connectivity and Accessibility	\$1,376,069
RSIP Midway Phase 16A	\$ 1,962
RSIP Midway Phase 16B	\$ 2,085
RSIP Midway Phase 16C	\$ 3,548
RSIP Midway Phase 16D	\$ 3,969
Runway 4R-22L Rehabilitation	\$ 7,318,186
Taxiway Y South	\$11,880,000
237990 - Other Heavy and Civil Engineering Construction	\$ 65,691,585
Midway Central Terminal Pad	\$ 64,000,000
Runway 4R-22L Rehabilitation	\$ 591,585
Taxiway Y South	\$1,100,000
238110 - Poured Concrete Foundation and Structure Contractors	\$ 12,130,971
Runway 4R-22L Rehabilitation	\$12,130,971
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$ 16,787,650
Midway Multimodal Connectivity and Accessibility	\$ 2,395,601
Restroom Accessibility Expansion and Rehabilitation	\$ 2,095,209
RSIP Midway Phase 16A	\$ 52,035
RSIP Midway Phase 16B	\$ 55,293
RSIP Midway Phase 16C	\$ 94,099
RSIP Midway Phase 16D	\$ 105,256
Runway 4R-22L Rehabilitation	\$ 9,790,156
Taxiway Y South	\$2,200,000

238220 - Plumbing, Heating, and Air-Conditioning Contractors	\$ 11,741,635
Midway Multimodal Connectivity and Accessibility	\$ 2,569,263
Restroom Accessibility Expansion and Rehabilitation	\$8,150,832
RSIP Midway Phase 16A	\$ 173,326
RSIP Midway Phase 16B	\$ 184,177
RSIP Midway Phase 16C	\$ 313,436
RSIP Midway Phase 16D	\$ 350,602
238320 - Painting and Wall Covering Contractors	\$ 10,515,425
Restroom Accessibility Expansion and Rehabilitation	\$ 10,471,517
RSIP Midway Phase 16A	\$ 7,450
RSIP Midway Phase 16B	\$ 7,916
RSIP Midway Phase 16C	\$ 13,472
RSIP Midway Phase 16D	\$ 15,070
238350 - Finish Carpentry Contractors	\$ 61,427,085
Midway Multimodal Connectivity and Accessibility	\$7,969,982
Restroom Accessibility Expansion and Rehabilitation	\$ 1,415,595
RSIP Midway Phase 16A	\$8,829,934
RSIP Midway Phase 16B	\$ 9,382,724
RSIP Midway Phase 16C	\$ 15,967,722
RSIP Midway Phase 16D	\$ 17,861,128
238910 - Site Preparation Contractors	\$ 13,731,057
Midway Multimodal Connectivity and Accessibility	\$ 2,035,059
Restroom Accessibility Expansion and Rehabilitation	\$ 426,072
Runway 4R-22L Rehabilitation	\$ 9,069,926
Taxiway Y South	\$2,200,000
238990 - All Other Specialty Trade Contractors	\$ 433,662
Runway 4R-22L Rehabilitation	\$ 433,662
484220 - Specialized Freight (except Used Goods) Trucking, Local	\$ 660,000
Taxiway Y South	\$ 660,000
541330 - Engineering Services	\$ 660,000
Taxiway Y South	\$ 660,000
541360 - Geophysical Surveying and Mapping Services	\$ 440,000
Taxiway Y South	\$ 440,000
541380 - Testing Laboratories and Services	\$ 660,000
Taxiway Y South	\$ 660,000
541512 - Computer Systems Design Services	\$ 701,054
Midway Multimodal Connectivity and Accessibility	\$ 701,054
561730 - Landscaping Services	\$ 629,559
Runway 4R-22L Rehabilitation	\$ 629,559
561990 - All Other Support Services	\$ 266,528
Runway 4R-22L Rehabilitation	\$ 266,528
Total	\$ 295,516,426

Table 5 gives the relative DBE availability for each NAICS code in which work is anticipated. The relative availability is calculated as the number of DBEs in the Illinois UCP Directory divided by the number of all firms per U.S. Census Bureau County Business Patterns data. In Table 6, we weight the relative DBE availability by the proportion of total project work in the given NAICS code (Relative DBE Availability x Weight). **We obtain a weighted base figure of 37.72%.**

Table 5: Relative DBE Availability

	DBEs*	All Available Businesses**	Percent DBE (Relative DBE Availability)
236220 - Commercial and Institutional Building Construction	167	917	18.21%
237110 - Water and Sewer Line and Related Structures Construction	60	181	33.15%
237130 - Power and Communication Line and Related Structures Construction	51	125	40.80%
237310 - Highway, Street, and Bridge Construction	188	190	98.95%
237990 - Other Heavy and Civil Engineering Construction	9	77	11.69%
238110 - Poured Concrete Foundation and Structure Contractors	127	411	30.90%
238210 - Electrical Contractors and Other Wiring Installation Contractors	115	1889	6.09%
238220 - Plumbing, Heating, and Air-Conditioning Contractors	73	2732	2.67%
238320 - Painting and Wall Covering Contractors	113	1157	9.77%
238350 - Finish Carpentry Contractors	88	1004	8.76%
238910 - Site Preparation Contractors	147	452	32.52%
238990 - All Other Specialty Trade Contractors	126	1065	11.83%
484220 - Specialized Freight (except Used Goods) Trucking, Local	378	999	37.84%
541330 - Engineering Services	226	1294	17.47%
541360 - Geophysical Surveying and Mapping Services	2	5	40.00%
541380 - Testing Laboratories and Services	32	211	15.17%
541512 - Computer Systems Design Services	190	1917	9.91%
561730 - Landscaping Services	105	3437	3.05%
561990 - All Other Support Services	51	328	15.55%
Total	2248	18391	12.22%

^{*}Certified DBEs ready to work in Cook, DuPage, Kane, Lake, McHenry, and Will Counties as listed in Illinois Unified Certification Program (UCP) Directory; data accessed 8/25/2025.

^{**}All businesses in Cook, DuPage, Kane, Lake, McHenry, and Will Counties as reported in US Census County Business Patterns CBP2023; data accessed 8/25/2025.

Table 6: Weighted DBE Availability

NAICS Code and Description	FAA-Assisted Project Value	Weight	Relative DBE Availability	Weighted DBE Availability
236220 - Commercial and Institutional Building Construction	\$ 10,101,266	3.42%	18.21%	0.62%
237110 - Water and Sewer Line and Related Structures Construction	\$ 4,133,130	1.40%	33.15%	0.46%
237130 - Power and Communication Line and Related Structures Construction	\$ 220,000	0.07%	40.80%	0.03%
237310 - Highway, Street, and Bridge Construction	\$ 84,585,819	28.62%	98.95%	28.32%
237990 - Other Heavy and Civil Engineering Construction	\$ 65,691,585	22.23%	11.69%	2.60%
238110 - Poured Concrete Foundation and Structure Contractors	\$12,130,971	4.11%	30.90%	1.27%
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$ 16,787,650	5.68%	6.09%	0.35%
238220 - Plumbing, Heating, and Air- Conditioning Contractors	\$11,741,635	3.97%	2.67%	0.11%
238320 - Painting and Wall Covering Contractors	\$ 10,515,425	3.56%	9.77%	0.35%
238350 - Finish Carpentry Contractors	\$ 61,427,085	20.79%	8.76%	1.82%
238910 - Site Preparation Contractors	\$ 13,731,057	4.65%	32.52%	1.51%
238990 - All Other Specialty Trade Contractors	\$ 433,662	0.15%	11.83%	0.02%
484220 - Specialized Freight (except Used Goods) Trucking, Local	\$ 660,000	0.22%	37.84%	0.08%
541330 - Engineering Services	\$ 660,000	0.22%	17.47%	0.04%
541360 - Geophysical Surveying and Mapping Services	\$ 440,000	0.15%	40.00%	0.06%
541380 - Testing Laboratories and Services	\$ 660,000	0.22%	15.17%	0.03%
541512 - Computer Systems Design Services	\$ 701,054	0.24%	9.91%	0.02%
561730 - Landscaping Services	\$ 629,559	0.21%	3.05%	0.01%
561990 - All Other Support Services	\$ 266,528	0.09%	15.55%	0.01%
Total	\$ 295,516,426	100.00%	12.22%	37.72%

IV. Step 2: Adjustment to Base Figure

a. Reduction in anticipated DBE participation in airfield projects

The City of Chicago has procured the following two FAA-assisted airfield projects since the issuance of a preliminary injunction against the DBE program on September 23, 2024 in the case of Mid-America Milling Company ("MAMCO") and Bagshaw Trucking vs. U.S. Department of Transportation. In both cases, the City was required to reduce the DBE contract goal to 0% after the MAMCO plaintiffs expressed their intent to participate.

- Midway Runway 13C-31C & Associated Taxiways Rehabilitation with original 25.6% contract DBE goal, advertised January 22, 2025
- O'Hare Grade Separated Service Roadway Taxiways K/L to Satellite 1 with original 23.88% contract DBE goal, advertised January 22, 2025

We anticipate the same outcome for new airfield projects in FY 2026-2028 and accordingly adjust our Step 1 base figure to reflect only race-neutral DBE participation in this work.

We exclude airfield projects and recalculate our Step 1 base figure. Table 3.1 lists the non-airfield projects identified for Midway in FY 2026-2028. We allocate project values across NAICS codes in Table 4.1 to determine the appropriate weight for each NAICS code in Table 6.1. In Table 6.1, we weight the relative DBE availability by the proportion of total project work in the given NAICS code (Relative DBE Availability x Weight) and obtain an **overall weighted DBE availability of 10.17**%. This overall weighted DBE availability for non-airfield projects is used to calculate the adjusted goal in Table 8 below.

Table 3.1: Anticipated FAA-Assisted Projects, Excluding Airfield Projects, FY 2026-2028

FAA-Assisted Project, Non-Airfield	Project Value
Midway Multimodal Connectivity and Accessibility	\$ 17,047,028
Restroom Accessibility Expansion and Rehabilitation	\$ 22,559,224
RSIP Midway Phase 16A	\$ 9,486,334
RSIP Midway Phase 16B	\$10,080,218
RSIP Midway Phase 16C	\$ 17,154,732
RSIP Midway Phase 16D	\$ 19,188,890
Total	\$ 95,516,426

Table 4.1: Anticipated FAA-Assisted Projects by NAICS Codes, Excluding Airfield Projects, FY 2026-2028

FAA-Assisted Project by NAICS Code, Non-Airfield	Project Value by NAICS	
236220 - Commercial and Institutional Building Construction	\$ 2,484,968	
RSIP Midway Phase 16A	\$ 421,627	
RSIP Midway Phase 16B	\$ 448,023	
RSIP Midway Phase 16C	\$ 762,454	
RSIP Midway Phase 16D	\$852,864	
237310 - Highway, Street, and Bridge Construction	\$ 1,387,633	
Midway Multimodal Connectivity and Accessibility	\$1,376,069	
RSIP Midway Phase 16A	\$1,962	
RSIP Midway Phase 16B	\$ 2,085	
RSIP Midway Phase 16C	\$ 3,548	
RSIP Midway Phase 16D	\$ 3,969	
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$4,797,494	
Midway Multimodal Connectivity and Accessibility	\$ 2,395,601	
Restroom Accessibility Expansion and Rehabilitation	\$2,095,209	
RSIP Midway Phase 16A	\$ 52,035	
RSIP Midway Phase 16B	\$ 55,293	
RSIP Midway Phase 16C	\$ 94,099	
RSIP Midway Phase 16D	\$ 105,256	
238220 - Plumbing, Heating, and Air-Conditioning Contractors	\$ 11,741,635	
Midway Multimodal Connectivity and Accessibility	\$ 2,569,263	
Restroom Accessibility Expansion and Rehabilitation	\$8,150,832	
RSIP Midway Phase 16A	\$173,326	
RSIP Midway Phase 16B	\$ 184,177	
RSIP Midway Phase 16C	\$ 313,436	
RSIP Midway Phase 16D	\$ 350,602	
238320 - Painting and Wall Covering Contractors	\$ 10,515,425	
Restroom Accessibility Expansion and Rehabilitation	\$ 10,471,517	
RSIP Midway Phase 16A	\$ 7,450	
RSIP Midway Phase 16B	\$7,916	
RSIP Midway Phase 16C	\$13,472	
RSIP Midway Phase 16D	\$ 15,070	
238350 - Finish Carpentry Contractors	\$61,427,085	
Midway Multimodal Connectivity and Accessibility	\$7,969,982	
Restroom Accessibility Expansion and Rehabilitation	\$ 1,415,595	
RSIP Midway Phase 16A	\$8,829,934	
RSIP Midway Phase 16B	\$ 9,382,724	
RSIP Midway Phase 16C	\$ 15,967,722	
RSIP Midway Phase 16D	\$ 17,861,128 \$ 2,461,121	
238910 - Site Preparation Contractors Midway Multimodal Connectivity and Accessibility	\$ 2,461,131	
Midway Multimodal Connectivity and Accessibility	\$ 2,035,059	
Restroom Accessibility Expansion and Rehabilitation	\$ 426,072	
541512 - Computer Systems Design Services	\$ 701,054	
Midway Multimodal Connectivity and Accessibility	\$ 701,054	
Total	\$ 95,516,426	

Table 6.1: Weighted DBE Availability, Non-Airfield Projects

NAICS Code and Description	FAA-Assisted Project Value	Weight	Relative DBE Availability	Weighted DBE Availability
236220 - Commercial and Institutional Building Construction	\$ 2,484,968	2.60%	18.21%	0.47%
237310 - Highway, Street, and Bridge Construction	\$ 1,387,633	1.45%	98.95%	1.44%
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$ 4,797,494	5.02%	6.09%	0.31%
238220 - Plumbing, Heating, and Air- Conditioning Contractors	\$ 11,741,635	12.29%	2.67%	0.33%
238320 - Painting and Wall Covering Contractors	\$ 10,515,425	11.01%	9.77%	1.08%
238350 - Finish Carpentry Contractors	\$ 61,427,085	64.31%	8.76%	5.64%
238910 - Site Preparation Contractors	\$ 2,461,131	2.58%	32.52%	0.84%
541512 - Computer Systems Design	\$ 701,054	0.73%	9.91%	0.07%
Services				
Total	\$ 95,516,426	100.00%	10.54%	10.17%

As presented in Table 7, Midway obtained 18.70% race-neutral DBE participation in FY 2022-2024. We therefore believe we can achieve 18.70% DBE participation on airfield projects in FY 2026-2028 through race-neutral means. This anticipated DBE participation rate on airfield projects is used to calculate the adjusted goal in Table 8 below.

Table 7: DBE Participation and Race-Neutral DBE Participation, FY 2022-2024

FAA Fiscal Year	FAA-Assisted Awards	DBE Awards	Percent DBE Awards	Race-Neutral DBE Awards	Percent Race-Neutral DBE Awards
2022	\$ 5,000,000	\$ 2,679,648	53.59%	\$ 1,105,955	22.12%
2023	\$0	N/A	N/A	N/A	N/A
2024	\$ 14,732,374	\$ 6,178,273	41.94%	\$ 2,583,874	17.54%
Total	\$ 19,732,374	\$ 8,857,921	44.89%	3,689,829	18.70%

b. Consideration of past DBE participation

As calculated in Table 6.1, the overall weighted DBE availability for non-airfield projects in FY 2026-2028 is 10.17%. As shown in Table 7, we achieved 44.89% DBE participation across all FAA-assisted Midway projects in FY 2022-2024. We average these two figures to estimate DBE participation in non-airfield projects in FY 2026-2028. The result, 27.53%, is used to calculate our overall adjusted goal in Table 8 below.

c. Adjusted goal

As presented in Table 8, we calculate an **overall adjusted DBE participation goal of 21.55% for FY 2026-2028**, based on anticipated goals of 18.70% on \$200,000,000 of airfield projects and 27.53% on \$95,516,426 of non-airfield projects.

Table 8: Step 2 Goal Adjustment

FAA-Assisted Project Type	Value	Anticipated DBE Participation Percent	Anticipated DBE Participation Value	Explanation of Anticipated DBE Participation
Airfield	\$ 200,000,000	18.70%	\$ 37,398,734	Assuming 0% contract DBE goals; race-neutral DBE participation of 18.70% based on race-neutral participation attained FY 2022-2024 (Table 7).
Non-Airfield	\$ 95,516,426	27.53%	\$ 26,294,968	Average of weighted DBE availability for anticipated projects, excluding airfield projects (10.17% from Table 6.1) and attained DBE participation FY 2022- 2024 (44.89% from Table 7).
Total	\$ 295,516,426	21.55%	\$ 63,693,702	

V. Use of Race-Neutral Methods and DBE Contract Goals

In accordance with 49 CFR 26.51, the City of Chicago strives to meet the maximum feasible portion of our overall DBE goal through race-neutral means, including but not limited to:

- Unbundling large scopes of work into smaller contracts to facilitate DBEs and other small businesses bidding on and winning prime contracts
- Establishing small contract opportunities open only to small businesses, including DBEs
- Establishing race-neutral small business enterprise contract goals
- Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate participation by DBEs and other small businesses
- Hosting educational webinars on contracting opportunities and procurement processes
- Conducting outreach to DBEs and other small businesses on contracting opportunities through electronic newsletters and bid alerts, printed resources, and vendor fairs
- Hosting networking sessions to connect prospective prime and subcontractors

- Providing technical assistance through network of City of Chicago Assist Agencies, including assistance with bonding and financing
- Providing one-on-one assistance to DBEs and other small businesses in navigating airport contracting opportunities through O'Hare and Midway Small Business Resource Centers
- Reviewing internal business processes to identify and address barriers to entry for DBEs and other small businesses

In addition to the methods above, the City of Chicago will establish DBE goals on FAA-assisted contracts with subcontracting opportunities to meet the portion of our overall goal not met through race-neutral means. We will perform a market analysis of DBE availability for the scope of work to determine an appropriate DBE goal for each contract.

We anticipate meeting 4.03% of Midway's overall FY 2026-2028 goal of 21.53% through race-neutral methods and 17.52% through race-conscious goals.

VI. Good Faith Efforts

On contracts with DBE goals, bidders/offerors are obligated to make good faith efforts by either committing to meet the goal or documenting their good faith efforts to meet the goal.

As stipulated in Section 26.53 of the City of Chicago's DBE Program Plan (January 2025), the City treats the bidder/offeror's compliance with good faith efforts requirements as a matter of responsiveness.

Responsiveness - Each solicitation for which a contract goal has been established will require all bidders/offerors to submit at the time of bid a compliance plan demonstrating how the bidder/proposer plans to meet the contract goal and/or documentation of good faith efforts. They must submit:

- 1) The names and addresses of DBE firms that will participate in the contract;
- 2) A description of the work that each DBE will perform (to count toward meeting a goal, each firm must be certified in a NAICS code applicable to the kind of work the firm would perform on the contract);
- 3) The dollar amount of the participation of each DBE firm participating;
- 4) Written and signed documentation of commitment to use a DBE subcontractor whose participation it submits to meet a contract goal;
- 5) Written and signed confirmation from the DBE that it is participating in the contract in the kind and amount of work provided for in the prime contractor's commitment. Each DBE listed to perform work as a regular dealer or distributor must confirm its participation according to the requirements of Section 26.53(c)(1);
- 6) If the contract goal is not met, evidence of good faith efforts. Documentation of good faith efforts must include copies of each DBE and non-DBE subcontractor

quote submitted to the bidder when a non-DBE subcontractor was selected over a DBE for work on the contract.

Provided that in a negotiated procurement, such as procurement for professional services, and other than design-build procurements, the bidder/offeror may make a contractually binding commitment to meet the goal at the time of bid submission, or the presentation of initial proposals, but provide the information required by (1)-(6) above before the final selection for the contract is made by the City.

VII. Public Notice of Goal

Following its approval by the Federal Aviation Administration, this FY 2026-2028 goal methodology document for Midway International Airport will be published on the City of Chicago's website to inform the public of the proposed goal and its rationale. The published document will be accompanied by an email address for submitting public comment.