



CITY OF CHICAGO
O'HARE INTERNATIONAL AIRPORT
DISADVANTAGED BUSINESS ENTERPRISE (DBE)
METHODOLOGY AND GOAL
FY 2026 – FY 2028
FOR FEDERAL AVIATION ADMINISTRATION (FAA)

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I. Summary

The City of Chicago has prepared this document to describe our methodology in establishing an overall Disadvantaged Business Enterprise (DBE) goal of **16.39%** for projects at O'Hare 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 O'Hare 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 O'Hare.

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	\$ 107,315,949
2027	\$ 8,797,961
2028	\$ 266,444,824
Total	\$ 382,558,734

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

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
541310 - Architectural Services
541330 - Engineering Services
541360 - Geophysical Surveying and Mapping Services
541380 - Testing Laboratories and Services

The 10 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
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 67,676,625
RSIP O'Hare Phase 19A	\$ 15,044,516
Runway 10L-28R Rehabilitation	\$ 29,652,335
Taxiway N Reconstruction	\$ 40,361,911
Taxiway V Realignment	\$ 61,551,914
Taxiways S, S1, S2 & S3	\$ 30,271,433
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 76,000,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Design	\$ 6,000,000
Terminal Wayfinding - Construction	\$ 53,000,000
Terminal Wayfinding - Design	\$ 3,000,000
Total	\$ 382,558,734

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	\$ 668,664
RSIP O'Hare Phase 19A	\$ 668,664
237110 - Water and Sewer Line and Related Structures Construction	\$ 32,587,598
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 3,383,831
Runway 10L-28R Rehabilitation	\$ 1,186,093
Taxiway N Reconstruction	\$ 3,632,572
Taxiway V Realignment	\$ 5,539,672
Taxiways S, S1, S2 & S3	\$ 605,429
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 18,240,000
237130 - Power and Communication Line and Related Structures Construction	\$ 3,055,142
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 676,766
Runway 10L-28R Rehabilitation	\$ 296,523
Taxiway N Reconstruction	\$ 403,619
Taxiway V Realignment	\$ 615,519
Taxiways S, S1, S2 & S3	\$ 302,714
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 760,000
237310 - Highway, Street, and Bridge Construction	\$ 128,487,819
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 20,302,988
RSIP O'Hare Phase 19A	\$ 3,112
Runway 10L-28R Rehabilitation	\$ 22,239,251
Taxiway N Reconstruction	\$ 21,795,432
Taxiway V Realignment	\$ 33,238,034
Taxiways S, S1, S2 & S3	\$ 23,309,003
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 7,600,000
237990 - Other Heavy and Civil Engineering Construction	\$ 11,863,354
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 6,767,663
Taxiway N Reconstruction	\$ 2,018,096
Taxiway V Realignment	\$ 3,077,596
238110 - Poured Concrete Foundation and Structure Contractors	\$ 54,086,819
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 23,686,819
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 30,400,000
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$ 34,833,462
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 5,414,130
RSIP O'Hare Phase 19A	\$ 82,523
Runway 10L-28R Rehabilitation	\$ 1,779,140
Taxiway N Reconstruction	\$ 4,036,191
Taxiway V Realignment	\$ 6,155,191
Taxiways S, S1, S2 & S3	\$ 1,816,286
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 7,600,000
Terminal Wayfinding - Construction	\$ 7,950,000

238220 - Plumbing, Heating, and Air-Conditioning Contractors	\$ 274,880
RSIP O'Hare Phase 19A	\$ 274,880
238320 - Painting and Wall Covering Contractors	\$ 11,815
RSIP O'Hare Phase 19A	\$ 11,815
238350 - Finish Carpentry Contractors	\$ 14,003,521
RSIP O'Hare Phase 19A	\$ 14,003,521
238910 - Site Preparation Contractors	\$ 10,191,383
Taxiway N Reconstruction	\$ 4,036,191
Taxiway V Realignment	\$ 6,155,191
238990 - All Other Specialty Trade Contractors	\$ 52,650,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 7,600,000
Terminal Wayfinding - Construction	\$ 45,050,000
484220 - Specialized Freight (except Used Goods) Trucking, Local	\$ 8,083,902
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 2,030,299
Runway 10L-28R Rehabilitation	\$ 1,482,617
Taxiway N Reconstruction	\$ 1,210,857
Taxiway V Realignment	\$ 1,846,557
Taxiways S, S1, S2 & S3	\$ 1,513,572
541310 - Architectural Services	\$ 9,000,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Design	\$ 6,000,000
Terminal Wayfinding - Design	\$ 3,000,000
541330 - Engineering Services	\$ 9,165,427
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 2,030,299
Runway 10L-28R Rehabilitation	\$ 889,570
Taxiway N Reconstruction	\$ 1,210,857
Taxiway V Realignment	\$ 1,846,557
Taxiways S, S1, S2 & S3	\$ 908,143
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 2,280,000
541360 - Geophysical Surveying and Mapping Services	\$ 6,709,522
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 1,353,533
Runway 10L-28R Rehabilitation	\$ 889,570
Taxiway N Reconstruction	\$ 807,238
Taxiway V Realignment	\$ 1,231,038
Taxiways S, S1, S2 & S3	\$ 908,143
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 1,520,000
541380 - Testing Laboratories and Services	\$ 6,885,427
Grade Separated Roadway A3/A4 (formerly S1 -S2)	\$ 2,030,299
Runway 10L-28R Rehabilitation	\$ 889,570
Taxiway N Reconstruction	\$ 1,210,857
Taxiway V Realignment	\$ 1,846,557
Taxiways S, S1, S2 & S3	\$ 908,143
Total	\$ 382,558,734

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 46.86%.**

Table 5: Relative DBE Availability

NAICS Code and Description	Available 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%
541310 - Architectural Services	54	822	6.57%
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%
Total	1956	13531	14.46%
*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 Bureau 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	\$ 668,664	0.17%	18.21%	0.03%
237110 - Water and Sewer Line and Related Structures Construction	\$ 32,587,598	8.52%	33.15%	2.82%
237130 - Power and Communication Line and Related Structures Construction	\$ 3,055,142	0.80%	40.80%	0.33%
237310 - Highway, Street, and Bridge Construction	\$ 128,487,819	33.59%	98.95%	33.23%
237990 - Other Heavy and Civil Engineering Construction	\$ 11,863,354	3.10%	11.69%	0.36%
238110 - Poured Concrete Foundation and Structure Contractors	\$ 54,086,819	14.14%	30.90%	4.37%
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$ 34,833,462	9.11%	6.09%	0.55%
238220 - Plumbing, Heating, and Air-Conditioning Contractors	\$ 274,880	0.07%	2.67%	0.00%
238320 - Painting and Wall Covering Contractors	\$ 11,815	0.00%	9.77%	0.00%
238350 - Finish Carpentry Contractors	\$ 14,003,521	3.66%	8.76%	0.32%
238910 - Site Preparation Contractors	\$ 10,191,383	2.66%	32.52%	0.87%
238990 - All Other Specialty Trade Contractors	\$ 52,650,000	13.76%	11.83%	1.63%
484220 - Specialized Freight (except Used Goods) Trucking, Local	\$ 8,083,902	2.11%	37.84%	0.80%
541310 - Architectural Services	\$ 9,000,000	2.35%	6.57%	0.15%
541330 - Engineering Services	\$ 9,165,427	2.40%	17.47%	0.42%
541360 - Geophysical Surveying and Mapping Services	\$ 6,709,522	1.75%	40.00%	0.70%
541380 - Testing Laboratories and Services	\$ 6,885,427	1.80%	15.17%	0.27%
Total	\$ 382,558,734	100.00%	14.46%	46.86%

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 O'Hare 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 21.83%**. 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
Terminal Wayfinding - Design	\$ 3,000,000
Terminal Wayfinding - Construction	\$ 53,000,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Design	\$ 6,000,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 76,000,000
RSIP O'Hare Phase 19A	\$ 15,044,516
Total	\$ 153,044,516

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	\$ 668,664
RSIP O'Hare Phase 19A	\$ 668,664
237110 - Water and Sewer Line and Related Structures Construction	\$ 18,240,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 18,240,000
237130 - Power and Communication Line and Related Structures Construction	\$ 760,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 760,000
237310 - Highway, Street, and Bridge Construction	\$ 7,603,112
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 7,600,000
RSIP O'Hare Phase 19A	\$ 3,112
238110 - Poured Concrete Foundation and Structure Contractors	\$ 30,400,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 30,400,000
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$ 15,632,523
Terminal Wayfinding - Construction	\$ 7,950,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 7,600,000
RSIP O'Hare Phase 19A	\$ 82,523
238220 - Plumbing, Heating, and Air-Conditioning Contractors	\$ 274,880
RSIP O'Hare Phase 19A	\$ 274,880
238320 - Painting and Wall Covering Contractors	\$ 11,815
RSIP O'Hare Phase 19A	\$ 11,815
238350 - Finish Carpentry Contractors	\$ 14,003,521
RSIP O'Hare Phase 19A	\$ 14,003,521
238990 - All Other Specialty Trade Contractors	\$ 52,650,000
Terminal Wayfinding - Construction	\$ 45,050,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 7,600,000
541310 - Architectural Services	\$ 9,000,000
Terminal Wayfinding - Design	\$ 3,000,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Design	\$ 6,000,000
541330 - Engineering Services	\$ 2,280,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 2,280,000
541360 - Geophysical Surveying and Mapping Services	\$ 1,520,000
Terminal Core ADA Curbside and Roadway Lighting & Wayfinding - Construction	\$ 1,520,000
Total	\$ 153,044,516

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	\$ 668,664	0.44%	18.21%	0.08%
237110 - Water and Sewer Line and Related Structures Construction	\$ 18,240,000	11.92%	33.15%	3.95%
237130 - Power and Communication Line and Related Structures Construction	\$ 760,000	0.50%	40.80%	0.20%
237310 - Highway, Street, and Bridge Construction	\$ 7,603,112	4.97%	98.95%	4.92%
238110 - Poured Concrete Foundation and Structure Contractors	\$ 30,400,000	19.86%	30.90%	6.14%
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$ 15,632,523	10.21%	6.09%	0.62%
238220 - Plumbing, Heating, and Air-Conditioning Contractors	\$ 274,880	0.18%	2.67%	0.00%
238320 - Painting and Wall Covering Contractors	\$ 11,815	0.01%	9.77%	0.00%
238350 - Finish Carpentry Contractors	\$ 14,003,521	9.15%	8.76%	0.80%
238990 - All Other Specialty Trade Contractors	\$ 52,650,000	34.40%	11.83%	4.07%
541310 - Architectural Services	\$ 9,000,000	5.88%	6.57%	0.39%
541330 - Engineering Services	\$ 2,280,000	1.49%	17.47%	0.26%
541360 - Geophysical Surveying and Mapping Services	\$ 1,520,000	0.99%	40.00%	0.40%
Total	153,044,516	100.00%	11.79%	21.83%

As presented in Table 7, O'Hare obtained 8.77% race-neutral DBE participation in FY 2022-2024. We therefore believe we can achieve 8.77% 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	\$ 33,427,005	\$ 15,053,507	45.03%	\$ 1,305,226	3.90%
2023	\$ 30,000,000	\$ 10,377,858	34.59%	\$ 4,767,858	15.89%
2024	\$ 80,000,000	\$ 23,059,854	28.82%	\$ 6,499,854	8.12%
Total	\$ 143,427,005	\$ 48,491,219	33.81%	\$ 12,572,938	8.77%

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 21.83%. As shown in Table 7, we achieved 33.81% DBE participation across all FAA-assisted O'Hare projects in FY 2022-2024. We average these two figures to estimate DBE participation in non-airfield projects in FY 2026-2028. The result, 27.82%, 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 16.39% for FY 2026-2028**, based on anticipated goals of 8.77% on \$229,514,218 of airfield projects and 27.82% on \$153,044,516 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	\$ 229,514,218	8.77%	\$ 20,119,419	Assuming 0% contract DBE goals; race-neutral DBE participation of 8.77% based on race-neutral participation attained FY 2022-2024 (Table 7).
Non-Airfield	\$ 153,044,516	27.82%	\$ 42,575,934	Average of weighted DBE availability for anticipated projects, excluding airfield projects (21.83% from Table 6.1) and attained DBE participation FY 2022- 2024 (31.81% from Table 7).
Total	\$ 382,558,734	16.39%	\$ 62,695,353	

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 1.44% of O'Hare's overall FY 2026-2028 goal of 16.39% through race-neutral methods and 14.95% 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 O'Hare 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.