



External Civil Rights Closeout Process

Missouri Department
of Transportation
External Civil Rights
2024



Topics

- Consultant Contracts Closeout
- Construction Projects Closeout
- In Depth Closeout Process
- DBE, Workforce & OJT Goals
- Good Faith Effort



Consultant Closeout Process

- Review Invoice from Prime Consultant
- Confirm payment with DBE sub consultant(s)
- Determine if project/contract goals were met



Local Public Agency (LPA) Documents for Closeout

When submitting to ECR, include the following documents for closeout of LPA projects:

1. Prime letter of payments made to all DBEs
2. CUFs, WRIs and Bulletin Board Reviews
3. Change Orders
4. OJT Documents, including completion report



MoDOT Construction Project Closeout Process

- Review closeout documents from project office or LPA
- Confirm final payment amounts with DBE firms
- Review CUF, Wage Rate Interviews, and Bulletin Board Checklists
- Determine if project goals were met for DBE, Workforce and On the Job Training



In-Depth Closeout Process

ECR requests additional documentation from DBE firms to review to confirm that DBE activities match 49 CFR 26.

Additional documents may include:

- Purchase Orders/Invoices
- Haul/delivery tickets
- Subcontracts
- Receipts of payments received/invoices paid
- Other documents may be needed, depending on work type



OJT & Workforce Goals

- Project goals are to provide 1,000 hours of on-the-job training for each trainee position designated
- What forms are required?
 - Trainee Notification (approval form), Plus Manpower, or other approved program, Training Agreement or union registration documentation
 - Monthly Reports
 - Completion Report



Good Faith Effort at Closeout

If the DBE participation does not meet the goal assigned (percent of the contract amount at bid), the OJT hours assigned as a goal, or the work force utilization goal, ECR will request a Good Faith Effort review from the project's Prime Contractor.

Good Faith Effort (GFE)

What does ECR look for when reviewing a GFE?

- Quality, quantity, and intensity of the efforts that the contractor has made
- Providing documentation of all efforts the contractor made to meet the project's DBE goal
- Race neutral methods utilized on completed projects
- Workforce and OJT documentation

If a GFE is not approved, liquidated damages may be assessed.



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QUESTIONS???

