



COLORADO
Department of Transportation

CDOT Contract Compliance Manual

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This manual has been produced by CDOT's **Office of Environmental Justice and Equity (EJE)**, the Headquarters Civil Rights Office. The EJE is responsible for developing civil rights programs and monitoring compliance administration.

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Table of Contents

Table of Contents	2
Section 1: Bidding Requirements	4
Prime Contractor Prequalification in B2GNow	4
Planning a Bid Using Wage Determination(s)	5
Wage Determination(s) & Local Agency Projects	6
On-the-Job Training Goals	8
Small Business Requirements: DBE Goals	10
Section 2: Pre-Construction	11
FHWA 1273: Required Contract Provisions	11
B2GNow Account Creation	13
CDOT Form 205: Sublet Permit Application	15
CDOT Form 1425: Supplier Application Approval Request	18
Safety and Accident Prevention Plan	20
Workplace Violence Policy	22
Equal Employment Opportunity (EEO) Policy	23
Affirmative Action Plan	25
Nondiscrimination: Title VI of the Civil Rights Act of 1964	27
Section 3: Active Project Compliance	29
Required Bulletin Board Postings	29
Americans with Disabilities Act (ADA) Requirements	31
Contractor Compliance Reviews	32
FHWA 1391: Federal-Aid Highway Construction Contractors Annual EEO Report	34
Prompt Payment to Subcontractors, Suppliers, and Rental Equipment Co.	36
Prompt Payment Reporting via B2GNow	38
Monthly Prompt Payment Reports (B2G System Audits)	41
On-the-Job Training (OJT) Program	42
Release of Retainage	4
Project Close-Out	

Section 1: Bidding Requirements

Prime Contractor Prequalification in B2GNow

Who Must Prequalify?

Prime Contractors must be prequalified prior to submitting a bid for a CDOT project. Only one prequalification is required per firm.

Why is Prequalification Required?

Prequalification is the process of review by CDOT of a contractor's fiscal and workmanship qualifications to perform work on a CDOT project. The prequalification application must be completed in the CDOT B2GNow system.

When is Prequalification Required?

New applications shall be submitted 17 calendar days prior to the bid date. Prequalified firms must submit a new application online at least 17 calendar days prior to the expiration of their existing prequalification.

Regulation/Rule/Specification

This is a CDOT rule. It is contained in Section 102.01 of [CDOT's Standard Specifications for Road and Bridge Construction](#).

Frequently Asked Questions

1. Is prequalification the same as having an account in B2GNow?

No. All contractors and suppliers working for CDOT must have an account in B2GNow. Only prime contractors must be prequalified.

2. If my firm is already prequalified, do we have to reapply for prequalification electronically?

Existing prequalifications are valid through their expiration dates. There is no need to reapply if your firm's prequalification is still valid. When your firm's prequalification is due to expire, you will need to submit the renewal application electronically at least 17 calendar days prior to the expiration to remain prequalified.

Planning a Bid Using a Wage Determination(s)

Wage Determination Overview

A wage determination is a list of pay rates and fringe benefits for each classification of mechanic and laborer that the U.S. Department of Labor (DOL) has determined to be prevailing in each area for a particular type of construction.

Who is Impacted?

This information applies to all contractors and subcontractors on a CDOT project that are responsible for entering and certifying weekly payroll while actively working on the project. Contractors will want to consider whether prevailing wages are required for the proposed project.

Where Do I Find the Wage Determination(s)?

As applicable, the wage determination(s) is attached to the plans and specifications for each contract and applies to the duration of the project. Per the requirements of the Davis Bacon and Related Acts and the 29 CFR 5.5, the prime contractor and all upper-tier subcontractors shall include the applicable wage determination(s) in all lower-tier subcontracts.

Regulation/Rule/Specification

Paying prevailing wage is required by the [Federal Davis-Bacon and Related Acts](#) and Senate Bill 19-196 and the associated Colorado House Bill 21-1056.

Frequently Asked Questions

1. Where can I find out more information about wage determinations?

Detailed wage determination information can be found in CDOT's [Certified Payroll - Guidance for Frequently Asked Questions](#).

Wage Determination(s) & Local Agency Projects

Who is Impacted?

Contractors are impacted when they work on CDOT local agency (i.e. city and/or county) projects that have Davis Bacon and Related Acts (DBRA) requirements. Wage determinations also apply to all subcontractors who perform work on the project.

When Are Davis-Bacon Wages Required?

Whether a local agency project has a Davis-Bacon requirement depends on two factors: (1) Type of funding and (2) the functional classification of the road involved on the project. If a FHWA-funded project is determined to be on a local road, it may be exempt from sections IV and V (labor standards) of the FHWA 1273.

When Does CDOT Make the Determination?

CDOT personnel will confirm the applicability of Davis-Bacon and Related Acts requirements prior to the project going out to bid.

Where Do I Find the Wage Determination(s)?

If Davis-Bacon wages apply, a wage determination will be attached to the contract's plans and specifications. Per the requirements of the Davis Bacon and Related Acts and the 29 CFR 5.5, the prime contractor and all upper-tier subcontractors shall include the applicable wage determination(s) in all lower-tier subcontracts. For assistance finding a wage determination, please contact the local agency engineer on the project.

Regulation/Rule/Specification

[Davis-Bacon and Related Acts FAQ](#)

Frequently Asked Questions

1. When do Davis-Bacon and Related Acts rules apply?

Davis-Bacon and Related Acts regulations apply based on funding streams and functional classifications. Just because a road is in a rural area does not necessarily mean that it will be exempt from Davis-Bacon (D-B) wages.

2. What funding streams require Davis-Bacon wages?

There could be a few types of funding that require Davis-Bacon wages. For local agencies as an example, any FHWA funding will require Davis-Bacon wages. Some of the sources of FHWA

funding requiring Davis-Bacon are Transportation Alternatives Program (TAP) funds, emergency funds, and Safe Routes to Schools. There are many other types of different funding sources that require DBRA.

3. **What about the Colorado state requirement (HB 24-92-102) for Davis-Bacon wages? Isn't a local agency held to the same standard as CDOT's projects -- something that requires local agency projects to pay prevailing wage?**

When the [Senate Bill 19-196](#) became a Colorado law, it outlined as part of Part 2 (Prevailing Wage for Public Projects) that the term "Agency of Government" did **not** include any county, city and county, city, municipality, town, etc. Therefore, local projects with only local and/or state funding in the construction component do **not** require D-B wages.

On-the-Job Training Goals

Who is Impacted?

All FHWA-funded projects are evaluated for an On-the-Job (OJT) contract goal. Accordingly, all prime contractors are impacted in that they are responsible for meeting the applicable contract OJT goal.

Why is OJT Required?

CDOT's OJT Project Special Provision and Standard Special Provision are implementations of 23 USC 140(A) (see link below). As an implementation of that law, the Federal Highway Administration (FHWA) requires state transportation agencies to establish a training program.

When Does CDOT Set the OJT Goal & Where to Find It

CDOT evaluates each FHWA-funded contract for an OJT goal before the project goes out to bid. Contractors need to understand that meeting the OJT goal requires some thought and attention ahead of time so that they can bid appropriately recognizing the training provision requirements. The OJT contract goal can be found in the On-the-Job Training Contract Goal Project Special Provision. The OJT requirements for the contract are outlined in the On the Job Training Standard Special Provision within the contract's specification package.

Regulation/Rule/Specification

OJT is a federal requirement contained in [23 CFR Part 230, Appendix B to Subpart A](#).

Frequently Asked Questions

1. Do all projects have an OJT goal?

All FHWA-funded projects are evaluated for an OJT goal. Some projects might have a zero goal, meaning no training hours are required on the project. The Contractor shall review the bid documents and/or contact the Regional Civil Rights Office for more information.

2. What happens if the training hours achieved fall short of the OJT goal?

If the training hours achieved fall short of the OJT contract goal, the prime contractor may be subject to a financial disincentive if good faith efforts were not made. See the CDOT On-the-Job Training Standard Special Provision for more information.

3. What are the types of OJT plans that can be used toward the OJT contract goal?

Contractors have three primary options for On-the-Job Training plans:

- CDOT's pre-approved classifications utilization program (PAC-UP)

- A registered U.S. Department of Labor training or apprenticeship program
- Approved programs through other groups like Colorado Contractors Association (CCA), Western Colorado Contractors Association (WCCA), and/or other workforce centers

Small Business Requirements: DBE Goals - not applicable until further notice

On Oct. 3, 2025, the United States Department of Transportation (USDOT) published an Interim Final Rule (IFR) in the Federal Register modifying the eligibility requirements for participation in the Disadvantaged Business Enterprise (DBE) program. The IFR mandated that all certified DBEs be reevaluated, and ultimately recertified, for continued program eligibility under these new requirements. For contracts effective on or after October 3, 2025, CDOT must complete the certification review process before resuming DBE contract goal setting. CDOT will notify affected parties once more information becomes available.

Section 2: Pre-Construction

FHWA 1273: Required Contract Provisions

FHWA 1273 Overview

The FHWA 1273 is a document that outlines the laws and required contract provisions that are associated with FHWA-funded projects. On federal-aid projects, the FHWA 1273 is required to be physically incorporated in the prime contract and every subcontract.

Who is Impacted?

This document applies to the prime contractor on any FHWA-funded construction contract as well as any subcontractor or supplier, regardless of the tier.

Why the FHWA 1273?

As a contractual document, the FHWA 1273 legally binds all contractors on federal-aid projects to the federal rules listed in the document. The FHWA 1273 notifies all contractors of these federal obligations. Topics listed in the FHWA 1273 include equal employment opportunity, affirmative action, Americans with Disabilities Act, Title VI of the Civil Rights Act of 1964, and Davis-Bacon and Related Acts. All contractors on CDOT federal-aid projects are required to abide by the provisions set forth in FHWA 1273.

When and Where to Address the FHWA 1273?

The FHWA 1273 must be physically incorporated into all subcontracts and incorporated by reference for work done under any purchase orders, rental agreements, and other agreements for supplies or service.

Regulation/Rule/Specification

[23 CFR 633.102](#)

Frequently Asked Questions

1. What happens if a contractor does not physically incorporate the FHWA 1273 into subcontracts?

The contractor is out of federal compliance. Being out of federal compliance can have different consequences based on the situation. Any contractor out of compliance must be proactive and work with CDOT to come into compliance. If the FHWA 1273 is not physically incorporated into the 1st tier subcontracts or included by reference for work done under any

purchase orders, rental agreements, and other agreements for supplies or service, the prime contractor should initiate a non-monetary change order to correct the issue. If the lower-tier subcontractor is out of compliance, it is the responsibility of the prime contractor to ensure that the upper-tier subcontractors remedies the situation by initiating a non-monetary change order to correct issue.

B2GNow Account Creation

Who Must Create an Account?

All contracting firms (including subcontractors, suppliers, consultants, and rental equipment companies) must create an account in the B2GNow system before being approved to work on a CDOT contract. Firms may have multiple users associated with the firm's account.

Why is Account Creation Required?

CDOT uses the B2GNow system to monitor small business participation and prompt payment compliance as well as gain written permission by CDOT to sublet, sell, transfer, assign or dispose of the Contract.

Regulation/Rule/Specification

This is a CDOT rule. The use of B2GNow is written as a contract specification in Sections 106.01 and 108.01 of [CDOT's Standard Specifications for Road and Bridge Construction](#).

Consequence of Not Having an Account

The failure to create an account in CDOT's B2GNow system will result in the contractor's CDOT Form 205 or CDOT Form 1425 being withheld, resulting in the firm not being allowed to start work on the project.

Frequently Asked Questions

1. How can a contractor access B2GNow?

B2GNow can be accessed via the following link: <https://cdot.dbesystem.com/>

2. Will the prime contractor, subcontractors, or suppliers be financially responsible for paying for the B2GNow software system while working on a CDOT project?

No, the use of B2GNow for CDOT projects does not cost money for the prime contractors, subcontractors, suppliers, or rental equipment companies to use the system.

3. How can a contractor add a user to the account in B2GNow?

- Login to B2GNow
- Go Settings
- Click "Add New User"
- Complete the form

4. How can the contact person be changed for the audit on a project?

- Login to B2GNow
- Click “View”
- Select the “My Contracts”
- Click on the contract that you want to open
- Under the “User Assignment” section, select the name of the Compliance Contact Person from the drop-down menu to assign them as the primary or secondary compliance person.

CDOT Form 205: Sublet Permit Application

CDOT Form 205 Overview

CDOT Form 205, Sublet Permit Application, is required when a contractor makes an agreement with an individual, firm, corporation, or other legal entity to perform part of the CDOT contract.

Who is Impacted?

Prime contractors are required to complete and submit the CDOT Form 205 in B2GNow for all subcontractors (including lower-tier) on the project. The CDOT Form 205 shall be approved by CDOT prior to the subcontractor beginning work on the project.

Why is the 205 Required?

CDOT is federally required to know who is working on its projects. In accordance with the FHWA 1273 (part VI, Subletting or Assigning the Contract) and CDOT Standard Specifications for Road and Bridge Construction 108.01, “The Contractor shall not sublet, sell, transfer, assign, or dispose of the Contract or Contracts, or any portion thereof without written permission from the Engineer.” This essential component helps keep CDOT aware of who is subcontracting on projects.

Regulation/Rule/Specification

FHWA 1273, part VI. See also section 108 of the [CDOT Standard Specifications for Road and Bridge Construction](#).

Frequently Asked Questions

5. What does the submittal of the CDOT Form 205 mean?

By submitting the CDOT Form 205 in B2GNow, the prime contractor certifies and acknowledges the following:

- There is a fully executed subcontract or service agreement in place.
- The subcontractor has not commenced work and will not commence work until the written subcontract (or other work agreement) has been fully executed and the CDOT Form 205 has been approved.
- The subcontract includes all prime contract terms and conditions.
- On federal-aid projects, the fully executed subcontract includes a copy of the FHWA 1273 - Required Contract Provisions Federal-Aid Construction Contracts.
- The contractor and subcontractor shall:

- Make partial payments to subcontractors and suppliers in accordance with subsection 107.01, CRS 24-91-103(2), Prompt Payment Statute, and subsection 109.06(e) Prompt Payment.
- Promptly notify subcontractors and suppliers of any reason for delaying partial payments.
- Provide a copy of the monthly estimate to subcontractors who perform work.

6. Where can a contractor find instructions on how to fill out the CDOT Form 205?

Instructions to complete the CDOT Form 205 can be found at the following link: [CDOT Form 205](#)

7. Do truckers need to submit a CDOT Form 205?

It depends. A trucker (including owner-operators) is considered a subcontractor when the truck driver hauls material onsite to onsite, performs work (construction, prosecution, completion, or repair) on the site of work, and/or hauls material off of the project solely (no offsite delivery work is conducted by the truck driver) and as a result, a CDOT Form 205 is required. Please see the [CDOT Trucking Compliance Resource Guide for the Preliminary Injunction 2025](#) for more information on trucking requirements.

8. How much of the project work can be subcontracted?

Prime contractors are required to perform at least 30% of the contract work via their own workforce (FHWA 1273, Part VI). Therefore, they are permitted to sublet up to 70% of work.

9. Can subcontractors further sublet a portion of the work?

Yes, if a subcontractor has a lower-tier subcontractor, the prime contractor shall provide the CDOT Form 205 to the upper-tier subcontractor for completion. Once completed, the upper-tier subcontractor shall provide the form to the prime contractor for the prime's submission into B2GNow.

10. If a subcontractor performs work for two different contractors on the same project, is a separate CDOT Form 205 required?

Yes, a CDOT Form 205 is required for the work under each contractor because the CDOT Form 205 is associated with separate subcontracts.

11. How does the prime contractor submit the CDOT Form 205 into B2GNow for approval?

There are many process guides available to assist the prime contractor with the CDOT 205 submission process. Please see the following [CDOT process guides](#):

- 8-1 Confirm Account Creation in B2GNow (Prime/Sub)

- 8-2 Determine if Company will be Performing as a Subcontractor (Form 205) or Supplier (Form 1425) (Prime)
- 8-3 Complete CDOT Form 205 or CDOT Form 1425 and Submit in B2G (Prime)

12. Is a separate CDOT Form 205 or CDOT Form 1425 required for an independent contractor (1099)?

For project compliance purposes, a 1099 independent contractor is classified as a subcontractor. Therefore, a CDOT Form 205 shall be submitted.

When the independent contractor is a truck driver, you must first determine if their role is that of a subcontractor truck driver or supplier truck driver to determine which form is required.

- **Subcontractor Truck Driver Role:** Requires a CDOT Form 205
- **Supplier Truck Driver Role:** Requires a CDOT Form 1425

For more details, please refer to the [CDOT Trucking Compliance Resource Guide for Preliminary Injunction](#).

Note on certified payroll: All 1099 independent subcontractors (including truck drivers acting as subcontractors) must submit their own certified payrolls in LCPtracker for all work performed on the project site.

CDOT Form 1425: Supplier Application Approval Request

Form 1425 Overview

The CDOT Form 1425, Supplier Application Approval Request, is required when a prime contractor or subcontractor makes an agreement with a supplier or rental equipment company in which the written agreement exceeds \$10,000.

Who is Impacted?

Prime contractors are required to complete and submit the CDOT Form 1425 in B2GNow for all suppliers and rental equipment companies on the project. If the supplier is contracted with a lower-tier subcontractor, the applicable subcontractor must complete these forms and submit them to the prime contractor for submission. The CDOT Form 1425 shall be submitted for approval to CDOT at such time that the \$10,000 amount is known to be exceeded and/or before the following occurs on the contract:

- the supplier's upper tier begins work, or
- rental equipment is being used, or
- incorporating materials into the contract

Frequently Asked Questions

1. Where can a contractor find instructions on how to fill out the CDOT Form 1425?

Instructions to fill out the CDOT Form 1425 can be found at the following link [CDOT Form 1425](#)

2. Do truckers need to submit a CDOT Form 1425?

It depends. A trucker (including owner-operators) is considered a supplier when the truck driver is engaged in offsite delivery work and as a result, a CDOT Form 1425 is required if the written agreement exceeds \$10,000. Please see the [CDOT Trucking Compliance Resource Guide for Preliminary Injunction 2025](#) for more information on trucking requirements.

3. If a supplier provides material to two different contractors on the same project, is a separate CDOT Form 1425 required?

Yes, a separate CDOT Form 1425 will be required for the supplies under each contractor because the CDOT Form 1425 is associated with each distinct agreement(s).

4. How does the prime contractor submit the CDOT Form 1425 into B2GNow for approval?

There are many process guides available to assist the prime contractor with the CDOT 1425 submission process. Please see the following [CDOT process guides](#):

- 8-1 Confirm Account Creation in B2GNow (Prime/Sub)
- 8-2 Determine if Company will be Performing as a Subcontractor (Form 205) or Supplier (Form 1425) (Prime)
- 8-3 Complete CDOT Form 205 or CDOT Form 1425 and Submit in B2G (Prime)

5. What is the prime contractor's responsibility if Box 17 ("Will the subcontractor purchase more than \$10,000 from a supplier firm(s)?") is checked "Yes" on the CDOT Form 205?

If a subcontractor indicates they will purchase more than \$10,000 from a supplier, the prime contractor must ensure the subcontractor completes and returns CDOT Form 1425. The prime contractor is then responsible for submitting the CDOT Form 1425 into B2GNow. This requirement applies to all contractors, including lower tier subcontractors.

Safety and Accident Prevention Plan

Plan Overview

The Safety and Accident Prevention Plan is a project specific policy written by the prime contractor that addresses how they will comply with all of the necessary laws to protect the traveling public as well as the workers on the project.

Who is Impacted?

All contractors must comply with all applicable federal, state, and local laws governing safety, health, life, and sanitation in protecting the workers on the project and the traveling public. The prime contractor must prepare a written Project Safety Management Plan which is specific to each project.

Plan Requirements

1. The name of the Project Safety Manager and his/ her alternate.
2. A list of significant and/or high-risk activities.
3. What will be done to reduce the risk in project activities?
4. When and where the project safety meetings will take place.
5. If the project is shut down due to a safety stand down, the plan shall also include provisions for a safety meeting.
6. Contractors may require a subcontractor to prepare a safety plan for any activity that is considered significant or high-risk.
7. Procedures for safety compliance for visitors to the project.
8. Provisions for safety inspections.
9. Procedures to correct any violations of the plan.
10. Procedures to come into compliance after a safety stand-down.
11. Signed certification statement that the plan complies with all federal, state, and local laws, rules, regulations, and guidelines for safety.

When the Plan is Due?

This Safety and Accident Prevention Plan is due prior to the start of construction.

Regulation/Rule/Specification

[FHWA 1273, Section VII](#). Also listed as a requirement under [CDOT Standard Specifications](#), 107.06.

Frequently Asked Questions

1. Are there other laws to be aware of for the development of the plan?

Yes, there are many associated laws, including but not limited to:

The Occupational Safety and Health Act, 29 CFR 1910, 29 CFR 1926, 23 CFR 634, Mine Safety and Health Administration (MSHA), Title 30 CFR, the “Colorado Work Zone Best Practices Safety Guide”, CFR 49, national consensus standards, and the Drug-Free Workplace Act (Public Law 100-690 Title V, subtitle D, 41 USC 701 et seq.).

Workplace Violence Policy

Policy Overview

CDOT upholds a requirement for non-violence on its projects.

Who is Impacted?

All contractors and employees working on CDOT projects are responsible for maintaining a safe workplace.

When does the Policy Apply?

The requirement to uphold a safe, nonviolent workplace begins as soon as the contract is awarded and continues for the duration of the contract.

Regulation/Rule/Specification

The description of workplace violence is found in [CDOT Standard Specifications for Road and Bridge Construction](#) 101.02, and the policy about sanctions and/or removal of a worker who demonstrates such behavior is found in 108.07.

Frequently Asked Questions

1. **What happens when an employee of the contractor demonstrates behavior that is considered violent?**

The employee shall be sanctioned as per the contractor's employment policies, and as appropriate, shall be reported to the appropriate authorities.

Equal Employment Opportunity (EEO) Policy

Policy Overview

An equal employment opportunity policy is a written statement that is a clear declaration of non-discrimination. The intent is to communicate the right of all persons in a company to work and advance based on merit, ability, and potential.

Who is Impacted?

All federal contractors (including subcontractors) should have an EEO policy or accept the one outlined through the FHWA 1273. For CDOT's intents and purposes, most contractors on CDOT projects are federal contractors.

Why is the Policy?

Aside from the federal requirements to have an EEO policy in place, the underlying principles for an EEO policy surround the essential components of non-discrimination in the workplace as these ideas that outline equality and justice are central to a fair work environment.

Regulation/Rule/Specification

FHWA Requirement for EEO plan

[Equal Employment Opportunity \(EEO\) Counseling Program](#)

FHWA 1273, Section II, Nondiscrimination

[Required Contract Provisions Federal-Aid Construction Contracts](#)

[41 CFR § 60-1.420](#)

Frequently Asked Questions

1. Who is considered a federal contractor?

FHWA outlines the term federal contractors as “any person, corporation, partnership or unincorporated association that holds a FHWA direct, or federally assisted construction contract or subcontract regardless of tier.”

2. Are smaller prime contractors required to have a policy?

All prime contractors and subcontractors are required to have an EEO policy in place, regardless of the size of the business. You may use the FHWA 1273's example in whole or as a template.

3. Can a contractor adopt the policy in the FHWA 1273 as their own?

Yes, a contractor can use the written policy of the FHWA 1273 as its own.

4. How often does the policy have to be communicated to the company's employees?

The policy must be on letterhead and signed and dated by the company president / owner. It must be distributed and explained to all supervisory and personnel office employees before the start of work and then no less often than once every six months. The company's EEO policy and the procedures to implement such policy are brought to the attention of all employees by means of meetings, employee handbooks, or other appropriate means. A dated agenda with minutes that were reviewed as well as a roster of attendees must be retained to comply.

Affirmative Action Plan

Plan Overview

An affirmative action plan is an action-oriented plan to ensure equal employment opportunity that includes goals and timetables for achieving results.

Who is Impacted?

Under 41 CFR Part 60, all contractors must demonstrate that all individuals have an equal opportunity for employment without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin. Good-faith efforts are required to eliminate past and present discrimination in all federally assisted programs and to ensure non-discriminatory practice.

When is the Plan Required?

An affirmative action plan is required for all contractors on federally assisted projects with a contract or subcontract more than \$10,000. The requirement for good faith efforts to demonstrate equal employment practices exist throughout the contract in a variety of ways.

Components of the Plan

1. Description of how the company does not discriminate.
2. Establish and maintain a list of minority and female recruitment sources.
3. Collect and maintain the list of applicants. This should include names, addresses, and phone numbers along with a list of all personnel actions taken with respect to every individual.
4. Develop On-the-Job training opportunities (prime contractors).
5. Disseminate equal employment (EEO) policies (all contractors).
6. Evaluate employment decisions to ensure equal opportunity (all contractors).
7. Post EEO posters.
8. Include the EEO tag line in employment advertising.
9. Direct recruitment efforts to minority and female community organizations.
10. Ensure that all facilities and company activities are non-segregated.
11. Document and maintain records of all solicitations of offers for subcontracts from minority and female contractors and suppliers.
12. Conduct an annual review of adherence to the company's EEO policies and affirmative action obligations.

Regulation/Rule/Specification

The [23 CFR Part 230](#) and the [41 CFR Part 60-4](#) require equal opportunity.

Frequently Asked Questions

- 1. Is an Affirmative Action Plan (AAP) and an Equal Employment Opportunity (EEO) Policy different?**

Yes. An EEO policy announces a non-discrimination mandate. An AAP is a document of how a contractor will achieve that policy using timetables and goals.

Nondiscrimination: Title VI of the Civil Rights Act of 1964

Title VI Overview

Pursuant to Title VI of the Civil Rights Act of 1964, it is CDOT's policy that no person shall on the grounds of race, color, nation origin, sex, disability, or age, be excluded from participation in be denied the benefits of/or be subjected to discrimination in any operation of CDOT to which CDOT extends federal financial assistance.

Who is Impacted?

Title VI protects the public and other external stakeholders against discrimination by CDOT staff, CDOT project staff, contractors or anyone doing business with CDOT.

Where to Direct Complaints

If there is a complaint about discrimination on a CDOT project, please contact the Title VI Specialist at dot_civilrights@state.co.us.

Regulation/Rule/Specification

The regulations contained in [49 CFR, Title 49, Subtitle A, Part 21](#) prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Frequently Asked Questions

1. How does Title VI apply to working with CDOT?

CDOT's Title VI program prohibits discrimination based on race, color, nation origin, sex, disability, or age as it relates to any CDOT program or activity. All federally assisted contracts must include the [USDOT Title VI Assurances](#).

2. How does national origin protection apply to working with CDOT?

National origin discrimination can result from the failure to provide meaningful access to CDOT's programs or activities for Limited English Proficiency persons (individuals who have a limited ability to read, write, speak, or understand English). Language can be a barrier to accessing important benefits or services, understanding, and exercising important rights, complying with applicable responsibilities, or understanding other information provided by CDOT. Contractors are responsible for complying with CDOT's Title VI Program and all limited English proficiency (LEP) requirements. As part of that assurance, the contractor cannot

participate in (directly or indirectly) any discrimination against any group, which includes LEP populations.

3. What is the difference between Title VI and Title VII?

Title VII prohibits discrimination in employment practices based on race, color, sex, national origin, or religion, whereas Title VI prohibits discrimination related to programs or activities receiving federal funds. If discrimination is reported on a CDOT project, the Prime Contractor is required to investigate. If there is a report of discrimination within the bidding processes, CDOT would then investigate the situation and review its policies. As a steward of Federal funds, CDOT complies with all FHWA nondiscrimination requirements.

Section 3: Active Project Compliance

Required Bulletin Board Postings

Program Overview

Job sites must have a bulletin board containing the EEO policy, wage determination(s), and other posters that are required by state and federal regulations and the contract. Due to Colorado's large Spanish speaking population, applicable posters in Spanish are recommended and may be required. The bulletin board shall be installed on or before the first appearance of workers on the project and shall remain in place until workers are no longer present. The bulletin board shall be located in a prominent, safe, and accessible area within the project limits where walk-up access to the display is maintained.

Who is Impacted?

The prime contractor is responsible for providing a main bulletin board at the project site that is prominent and accessible to all employees and lower tier contractors.

What Posters are Required?

CDOT has a list of all of the [Required Posters for Jobsite Bulletin Boards](#).

Regulation/Rule/Specification

DOL guidance on [Workplace Posters](#)

CDLE guidance on [Posters](#)

FHWA requirements on [Job site Posters](#)

Frequently Asked Questions

1. The project doesn't have a staging area. Can the prime contractor just use a binder to keep all the posters?

No. Both USDOL and FHWA prohibit that practice; posters must always be publicly visible.

2. Can the prime contractor provide the law and wage information electronically?

No, notices and posters must be displayed in "conspicuous places, available to employees and applicants for employment..."

3. How often should the bulletin board be checked for accuracy?

Since bulletin board requirements evolve during a project, the board must be updated immediately whenever a poster change occurs. At a minimum, the board should be reviewed quarterly to ensure ongoing compliance and accuracy.

4. Is the wage conformance, issued by the USDOL, required to be posted on the project bulletin board?

Yes, the wage conformance letter, issued by the USDOL, is required to be posted on the project bulletin board.

5. What is acceptable as it relates to the condition of the posters displayed?

Posters shall be legible, vibrant, and present at all times. Any posters that are faded, damaged, or missing shall be replaced immediately to maintain display standards.

Americans with Disabilities Act (ADA) Requirements

Program Overview

The ADA is a law that prohibits discrimination based on disability.

Who is Impacted?

This law is pertinent to all contractors.

How does the American with Disability Act Apply?

Title I and Title II of the ADA are relevant to construction projects. Under [Title I](#) (Employment), disability discrimination is prohibited; it occurs when an employer treats a qualified employee or applicant unfavorably due to their disability.

Disability discrimination also occurs when a covered employer or other entity treats an applicant or employee less favorably because he/she has a history of a disability or because he/she is believed to have a physical or mental impairment that is not transitory (lasting or expected to last six months or less) and minor.

The law requires an employer to provide reasonable accommodation to an employee or job applicant with a disability, unless doing so would cause significant difficulty or expense for the employer (“undue hardship”).

The law also protects people from discrimination based on their relationship with a person with a disability (even if they do not have a disability). For example, it is illegal to discriminate against an employee because their partner has a disability. The EEOC offers technical assistance related to ADA: [EEOC Disability-Related Resources](#). [Title II of the ADA](#) covers all activities of state and local governments and public transportation and requires that people with disabilities have an equal opportunity to benefit from all programs, services, and activities.

Examples of the activities included in these policies are temporary traffic control, crosswalk closure, pedestrian detours, and other accommodated accessibility for people with disabilities. Please see [CDOT’s Accessibility Program](#) website for more information.

Regulation/Rule/Specification

While Form FHWA 1273 was last revised in 2023, the Title II regulations established in 2012 remain a core requirement. Under Section II, Paragraph 8, contractors are obligated to understand and comply with the Americans with Disabilities Act (ADA) at both their home offices and construction sites. [ADA Guidance & Resource Materials](#).

Contractor Compliance Reviews

Overview

Contract compliance reviews (CCRs) are reports that are used to determine if a contractor is operating within the confines of the federal requirements.

Who is Impacted?

Contractors who have been chosen for a compliance review will be notified by the Region Civil Rights Office.

What is Required?

As part of CDOT's Stewardship Agreement with FHWA, CDOT is required to conduct compliance reviews of the EEO policies and other related practices. CCRs are also required by 23 CFR 230.

Anytime a contractor is working on a project, they can be subject to a compliance review. The contractor can also be subjected to a review if there are questions about their practices, policies, or procedures violating some aspect of CDOT or USDOL regulation. Typically, these reviews are not done any more frequently than once every three years per contractor.

Regulation/Rule/Specification

The requirement to conduct contract compliance reviews is outlined in [23 CFR 230](#), CCR Requirements.

Frequently Asked Questions

1. How will the prime contractor know if their firm has been chosen for a review?

CDOT will notify (either through mail or email) the company that they have been selected for a review. This letter will outline the basic information regarding the review, and it will also include a request for the submission of required documentation.

2. What happens if the company refuses to participate in the review?

The contractor will be held in non-compliance and will likely face financial progress estimate withholding until CDOT gets the required information requested. If there is no effort to provide the necessary information, the contractor could be barred.

3. Can the date of the compliance review be changed?

While recognizing the importance of these types of reviews, CDOT also understands that business goes on and can be flexible with providing other date alternatives.

4. What happens if a contractor is found out of compliance?

The company will have a period of time to review, update, and remediate those areas that need attention. If those necessary changes are made, the company will have a new determination of compliance, and there will be no further issues with it. If those changes aren't made, a determination of non-compliance will be made, and there are several consequences that could take place including financial disincentives and up to disbarment.

5. Can a subcontractor be chosen for a review?

Yes. Subcontractors, as well as prime contractors, may be evaluated to ensure they are meeting specific contract requirements.

FHWA 1391: Federal-Aid Highway Construction Contractors Annual EEO Report

FHWA 1391 Form Overview

The FHWA Annual Equal Employment Opportunity (EEO) Report is required for all FHWA-funded construction contracts. The FHWA 1391 report effectively summarizes a contractor's project labor force for the last full pay period ending in July. The Annual EEO Report collects employment data from all construction contractors.

Who is Impacted?

All contractors and subcontractors (regardless of tier) on active CDOT Federal-Aid Highway construction projects valued at \$10,000 or greater during the final full pay period of July must submit workforce employment information within LCPtracker.

What is Required?

For all federal-aid projects let by CDOT, contractors and subcontractors will submit their EEO reporting information via LCPtracker. For all CDOT projects let by local agencies, outside of the city and county of Denver, they will also submit all 1391 data via LCPtracker just like all other projects.

Regulation/Rule/Specification

[23 CFR, Appendix C to Subpart A of Part 230](#)

Frequently Asked Questions

1. What if subcontractors are not filling out the forms?

Please notify the project engineer so that s/he can be aware of the problem and address it at a project level. Please note that the prime is always responsible for the compliance of the subcontractor, and if a subcontractor is not compliant with the requirement to fill out the necessary paperwork associated with the project, financial disincentives may apply.

2. Does the CDOT project number refer to the five-digit sub-account number or the long number with letters, numbers, and dashes?

For CDOT purposes, always refer to the project number with the five-digit (sub- account) number.

3. What needs to be reported?

The data requested is for the project workforce only. This information is **not** required for 100% state-funded projects, nor is it needed for professional service contracts. Organizations performing only professional services work (and no onsite labor) do not need to complete the FHWA 1391 Report.

4. Where can contractors find directions for the FHWA 1391?

Contractors can find directions for the FHWA 1391 on the CDOT website prior to the reporting period.

Prompt Payment to Subcontractors, Suppliers, and Rental Equipment Companies

Prompt Payment Overview

CDOT requires prime contractors to ensure that payment is released promptly at all tiers of the contract.

Who is Impacted?

All contractors with lower tier subcontractors or suppliers are contractually obligated to pay their subcontractors and suppliers promptly.

What is Required?

USDOT requires CDOT to establish prompt pay procedures. CDOT's contract specification includes the specific seven day pay-when-paid requirement, which means prime contractors must pay subcontractors within seven days of receiving payment for the subcontractors' work from CDOT. Primes must also ensure that each tier of subcontractor abides by the seven-day rule.

Regulation/Rule/Specification

The federal prompt payment requirements can be found at [49 CFR 26](#). The State of Colorado prompt payment requirements can be found at [CRS 24-91-103](#).

CDOT's rule is included in Section 109.06 of the [Contract Specification](#).

Frequently Asked Questions

- 1. What if the prime contractor has good cause to withhold the subcontractor's or supplier's payment?**

If the prime contractor has good cause to withhold a progress payment, the prime contractor must notify the subcontractor/supplier in writing specifying the amount being withheld and providing adequate justification for withholding the payment. The notice must also clearly state what conditions the subcontractor must meet to receive payment. The notice is due within 7 days of receiving your payment from CDOT (i.e. when prompt payment would be due if not for the withholding). The good cause notice should be uploaded in B2GNow with the month's audit that payment is withheld.

- 2. When will the CDOT engineers authorize partial payment?**

CDOT will issue partial payments monthly based on the progress estimates. These estimates are created by the project engineer based on the value of work performed, materials placed in accordance with the contract, and the value of the materials on hand.

Prompt Payment Reporting via B2GNow

Reporting Overview

Prompt payment reporting is the mechanism through which contractors notify CDOT of any payment received and paid during the audit period.

Who is Impacted?

All prime contractors, subcontractors, and suppliers on a CDOT contract must complete monthly Prompt Payment Audits in B2GNow.

What is Required?

CDOT's contract specification outlines requirements for prompt payment reporting. For several years, the online system B2GNow has replaced CDOT Forms 1418 and 1419. Prime contractors must report all payments received from CDOT and paid to first-tier subcontractors, suppliers, and rental equipment companies. Every lower tier firm must confirm or dispute reported payments from higher tiers, report any withheld retainage, and report any payments to lower tier firms. Prime contractors are responsible for ensuring compliance with CDOT's reporting requirements at all tiers.

There are two components to prompt payment: 1) All prime and subprime contractors (a subcontractor or supplier that has a contract with a lower-tier subcontractor and/or supplier and is a payor on the project) must report payments made by the 15th of the month 2) Payment confirmations must be completed by subcontractors, suppliers, and rental equipment companies within 15 days of the payment being reported in the audit.

Regulation/Rule/Specification

The federal prompt payment requirements can be found at [49 CFR 26](#). CDOT's rule is included in Section 109.06 of the [Construction Specifications](#).

Frequently Asked Questions

1. What are sub-prime contractors?

Any contractor other than the prime contractor who has lower tier subcontractors or suppliers and is a payor on the project is considered a sub-prime contractor. The sub-prime designator means a firm is a subcontractor to the prime contractor on the contract but has a subcontract or written agreement with lower tier firms.

2. Should a prime contractor report payment to their second-tier subcontractors to close the audit?

The prime contractor should not report payment information to subcontractors that they do not pay directly. Each firm is responsible for reporting payments to its own lower-tier subcontractors and suppliers. Audits remain open until the prime contractor and all sub-prime contractors have reported payments in B2GNow.

3. What pay period is the audit capturing?

The monthly audit captures all payments received or released during the Audit Period. Audit Periods are calendar months. They are not linked to invoice dates, pay estimates, or work periods.

4. What if a prime contractor receives multiple payments in one month or pays one subcontractor twice in one calendar month?

Contractors should report the totals of all payment activity that occurred during the Audit Period. When asked for the payment date, record the date of the first payment in the “Payment Date” field and include all payment dates made for the audit period in the “Payment Detail” section.

5. What is a discrepancy in B2GNow?

Discrepancies are created in B2GNow when higher and lower tier contractors enter different payment amounts during the monthly prompt payment audit. Sometimes these occur due to incorrect data entry, but they can also reflect instances of disputed payment or withholding. For more information on notifying CDOT of a discrepancy, please review the next two sections of this manual, Confirming or Disputing Payment for Subcontractors.

6. What documentation is required to resolve a discrepancy in B2G?

To resolve a discrepancy, contractors will need to provide proof that the payment was received from or released to the other party. Proof may be both sides of a canceled check, an EFT receipt, or some other documentation showing the payment was received or released on the claimed date.

7. What do prime contractors need to include in the comments section of the report?

When reporting payments made to lower tiers, prime contractors should include the check number, EFT reference, or other proof of payment. If the contractor is withholding payment for any reason, provide a copy of the good cause notice sent to the subcontractor or supplier. When disputing the payment reported by a higher-tier, include a detailed description of the situation as you understand it.

- 8. If everyone must report payments made to lower tier firms by the 15th of the month, does that contradict CDOT's seven day pay-when-paid rule?**

No. The reporting system has no effect on when payments are made or due. Prompt payment reporting is simply a historic data collection tool; it collects data about the previous month.

Monthly Prompt Payment Reports (B2G System Audits)

Prime Contractors

Monthly Audit reports are automatically generated on the first day of every month, and request information about the actual payment made and received during the Audit Period regardless of the associated invoice or pay estimate date. For example, the Audit report for October 2026 is generated on November 1, 2026, and is requesting information about money paid in and out in the month of October. Most likely, these payments reflect amounts from the September Pay Estimate and September invoices.

Subcontractors

Monthly Audit reports are automatically created and sent to the prime contractor and any sub-prime contractors (subcontractor with any lower tier contractors or supplier) on the first day of every month. These audits are released to lower tier subcontractors as soon as the prime contractor or sub-prime contractor reports the payment made to its lower tiers. Contractors, at any tier, have fifteen days to complete the audit from the day it is released to them for their confirmation. Audits request information about the actual payments made and received during the Audit Period. **This report does not consider what month the work was performed or invoiced - only paid.** For example, the Audit report for October 2026 is generated and released to the prime contractor and sub-prime contractors on November 1, 2026, to collect their payment information. It is requesting information about money out in the month of October. Most likely these payments reflect amounts from the September pay estimate and September invoices.

For detailed information on how to report payments in B2GNow, see Process Guide 9-1 Reporting Payments in B2GNow.

Confirming or Disputing Payment

Within 15 days of receiving notice from CDOT Civil Rights that the prime has reported payments, subcontractors/suppliers shall login to the system to confirm payment.

Resolving Discrepancies

When a lower tier subcontractor or supplier reports a discrepancy (i.e. disagrees with a payment amount reported by a higher tier contractor) CDOT, the prime contractor, and the subcontractor/supplier who reported a discrepancy will be notified of the issue. All parties should login to the system to investigate and respond to the discrepancy. No matter who reports the payment or discrepancy, the parties involved in resolving it are the reporting subcontractor, the prime contractor, and the CDOT Project Engineer. For detailed information on how to resolve a discrepancy in B2GNow, see Process Guide 9-3 Subcontractor or Supplier Attempt to Resolve Issue with Higher-Tier.

On-the-Job Training (OJT) Program

Program Overview

The OJT program is an implementation of a federal job training policy that aims to assure “the increased participation of minority groups and disadvantaged persons and women in all phases of the highway construction industry.” Construction contractors must therefore meet OJT goals on FHWA-funded projects.

Who is Impacted?

Prime contractors are held to the OJT goal requirements that are outlined in the CDOT advertisement documents.

How does CDOT Track OJT Participation?

CDOT uses three forms and the electronic payroll system LCPtracker to monitor OJT program participation. All three forms must be filled out completely, approved by CDOT, and uploaded into LCPtracker to get OJT project goal credit for the trainee’s hours.

1. CDOT Form 1337 - Contractor Commitment to Meet OJT Requirements Submitted at the preconstruction meeting with a copy of the training plan or collective bargaining agreements. This form requires approval from the Region Civil Rights Office.
2. CDOT Form 838 - OJT /Trainee Apprentice Record. This form requires approval from the Region Civil Rights Office. For trainees and apprentices, the rates and levels of all participants must be included. For all union participants, union rate sheets must be included.
3. CDOT Form 832 - Trainee Status and Evaluation Report. This form is submitted monthly to the CDOT project engineer/project manager for approval.

What is the Required Documentation?

The 1337, the 838, and the 832 should all be sent to the CDOT project engineer/project manager. CDOT also needs a copy of either the approved training plan or the collective bargaining agreement with the wage sheet.

Regulation/Rule/Specification

This program is an implementation of 23 USC 140(A) and 23 CFR 230.107 However, for specific CDOT requirements, please visit the [CDOT OJT website](#).

Frequently Asked Questions

1. What happens if the prime contractor cannot meet the OJT contract goal?

First and foremost, please begin talking with the CDOT project engineer/project manager and the CDOT Region Civil Rights Office early. If the OJT contract goal is not met and good faith efforts are not submitted and approved, there will likely be a disincentive applied at the end of the project. For more information about how that formula is applied, please see the OJT Standard Specification associated with the contract.

2. Can a trainee be entered into the training program and still be paid full journey wages?

Yes, a contractor can always pay above the required minimum amount.

3. Can a trainee be entered into the training program and have the contractor pay at reduced wages?

Yes, contractors can pay at the outlined percentage of the base rate that each employee is guaranteed according to the plan document requirements or the collectively bargained agreement.

4. When are trainee/apprentice hours eligible to be credited toward the OJT contract goal?

The CDOT Form 1337 shall be approved for each OJT program utilized on the project. Once the CDOT Form 1337 is approved, a CDOT Form 838 shall be submitted and approved for every individual trainee/apprentice in order to count toward the OJT contract goal. Early submission of OJT documentation is highly recommended to avoid the loss of creditable hours.

5. Can a prime contractor add a trainee/apprentice after the project has started?

Yes, contractors can add an approved trainee at any point on the project. Contractors will need to fill out all forms for all participants so the hours can be accurately tracked. There are two mandatory steps for counting apprentices/trainees within LCPtracker. All apprentices and trainees must be tagged (by the Civil Rights personnel) and must be entered into the system using an apprentice/trainee code within the payroll. If there is no apprentice/trainee code within LCPtracker for the project, contact the Civil Rights Region Specialist.

6. Can the OJT hours of subcontractors count toward the OJT contract goal?

Yes, the OJT hours of subcontractors can count toward the OJT contract goal if approved. The CDOT Form 1337 and CDOT Form 838 are required to be approved prior to OJT goal counting.

7. What are the easiest ways to make sure that there are no delays in utilizing OJT?

The easiest way is to make sure that the forms are all submitted timely. It is also the prime contractor's responsibility to provide the latest union agreements so that CDOT can enter those wages as soon as possible. If you do not hear back from region personnel or from the project engineer/project manager within seven calendar days, please follow up so action can be taken.

8. What are the steps for completing a CDOT Form 832 prior to submission to CDOT?

The employer of the apprentice/trainee (whether the prime contractor or a subcontractor) shall fill out the CDOT Form 832. Once completed, subcontractors (if applicable) shall submit the form to the prime contractor for signature and submission to CDOT.

a. Data Verification and Reconciliation

- i. Before submitting, the employer must verify the trainee's work hours by comparing internal records—such as certified payrolls, timecards, or field reports—against the “**OJT Report - Using Demographics**” generated from LCPtracker. Only the prime approver for the prime contractor can access the OJT report in LCPtracker. If a subcontractor requires this report, a request shall be made to the prime contractor providing the exact reporting dates.
- ii. If the hours do not match, the payroll specialist must identify and resolve the discrepancy before proceeding. The OJT classification codes must be used in LCPtracker in order to count toward the OJT contract goal.
- iii. In order for OJT training hours to be credited toward the OJT contract goal, the apprentice to journeyworker ratio shall be followed as outlined in the approved OJT program.

b. Reporting Period Standards

- i. **Standard Monthly Reporting:** Use the full calendar month for each Form 832 (e.g., November 1 through November 30).
- ii. **First Submission:** For a trainee's initial CDOT Form 832, the reporting period begins on the **Form 838 approval date** and ends on the last day of that calendar month.

Example: If CDOT Form 838 is approved on November 15, the first Form 832 reporting period will be November 15-November 30.

There are many process guides available to assist the prime contractor and subcontractors with the submission of the OJT paperwork. Please see the following [CDOT process guides](#):

- 7-1 Complete CDOT Form 1337 and Submit to CDOT PE/PM (Prime Contractor)

- 7-4 Complete CDOT Form 838 and Submit to CDOT PE/PM (Prime Contractor/ Subcontractor)
- 7-8 Contractor Uses OJT Classification Codes to Submit Payroll for Trainee (Prime/Subcontractor)
- 7-9 Complete CDOT Form 832 for Approved Trainees and Submit to PE/PM (Occurs Monthly) (Prime Contractor/Subcontractor)

Release of Retainage

Retainage Overview

Retainage is an amount that may be withheld from each progress payment by the payer (CDOT, the prime contractor, or a higher tier subcontractor). That withheld money may be released in full at the end of the project or in part upon request once a subcontractor's work has been deemed satisfactorily complete.

Who is Impacted?

Higher tier contractors may withhold retainage from each progress estimate on work performed by lower tier subcontractors. CDOT also retains a portion of the prime contractor's progress payments.

What is Required?

The prime contractor is obligated to release retainage to a subcontractor if the work identified in the subcontractor's CDOT Form 205 is "satisfactorily completed," meaning CDOT has approved it as a component of a partial or final acceptance of the entire project. Subcontractors may also request the release of retainage in writing. Withheld money may be released in full at the end of the project or in part upon request once a subcontractor's work has been deemed satisfactorily complete.

Regulation/Rule/Specification

The federal prompt payment requirements can be found at [49 CFR 26](#).

CDOT's rule is included in Section 109.06 of the [Construction Specifications](#).

Frequently Asked Questions

1. How can a subcontractor request the release of its retainage?

A subcontractor can make a request to the prime or higher tier sub in writing. The higher tier contractor must make a determination regarding the subcontractor's work within ten days. If accepted, the prime contractor or sub-prime contractor must release the retainage to the subcontractor within seven days. If rejected, the contractor must provide the subcontractor with a specific description of the deficiencies in writing. For the full procedure please see Section 109.06 of the CDOT contract specification.

2. What if the prime contractor released the subcontractor's retainage then the work is damaged on the job and needs repaired?

Once the subcontractor's work has been accepted, any future liability throughout the duration of the project falls to the prime contractor. The subcontractor was contracted to perform a service. By accepting the work, the prime and CDOT are acknowledging that the subcontractor has performed that service satisfactorily.

Project Close-Out

Close-Out Overview

CDOT internal staff evaluate the status of a CDOT contract, complete with all of its associated obligations prior to closing out the project in the CDOT systems.

Who is Impacted?

The prime contractors and subcontractors can be involved in the close out process as CDOT makes determinations about whether or not goals were met and obligations were fulfilled. If requirements (for Civil Rights and other areas) were met, everything moves forward. If requirements were not met, the PE/PM will direct next steps in terms of moving forward or withholding progress estimates. CDOT Finals Engineers review the prime contractor's progress toward its obligations as well as contract goals to establish withholding of progress payments and potential financial disincentives.

What is Required?

CDOT Region Civil Rights Officers review several items before the project is closed:

- 1) The prime contractor's fulfillment of the OJT goal.
- 2) B2GNow audits are complete with no discrepancies.
- 3) The certified payroll records are complete, within compliance, and are approved by the prime contractor and accepted by the CDOT PE/PM.
- 4) CDOT Form 205 and 1425 have been submitted, uploaded, and approved as needed for the project.

Frequently Asked Questions

1. What happens if a prime contractor falls short of its contract OJT goal?

Absent an approved CDOT Form 1336 for the prime contractor not meeting the contract OJT goal, the prime contractor may be issued a disin

centive as outlined in the OJT standard special provision.

2. How are sanctions and disincentives collected?

CDOT will recover any owed sanctions or disincentives by withholding them from the prime contractor's final retainage payment.