

2026 FHWA 1391 EEO Report Instructions:

CDOT and City and County of Denver Projects

The FHWA-1391 is an annual requirement that summarizes the demographic composition of the project workforce employed during the last full payroll period of July.

- **Submission Deadline:** To ensure accurate data consolidation and timely submission to CDOT, the following is a staggered deadline:
 - **Subcontractor Submission Deadline:** August 14, 2026
 - **Prime Consolidation and Review Period:** August 17-August 27, 2026
 - **Final Prime Submission Deadline:** August 28, 2026
- **Target Reporting Period:** The last full payroll period in July 2026. The report must capture all personnel who performed project-related work during this period, including both on-site DBRA classifications and non-prevailing wage staff assigned exclusively to the project.
- **Critical Compliance Note:** While the City and County of Denver (CCD) utilize LCPtracker for certified payroll, this specific reporting process requires manual entry. All data must be submitted using the provided FHWA-1391 Excel spreadsheet for CCD projects. Automated uploads or entries within LCPtracker will not satisfy this requirement.
- **The Submission Process:** Contractors must follow this workflow to submit the required data:
 1. **Subcontractors:** Complete the Excel form for each applicable CCD project and submit it directly to the Prime Contractor.
 2. **Prime Contractors:** Collect the forms from all subcontractors, consolidate the workforce data into one Excel form, and include the Prime Contractor's own workforce data.
 3. **Final Submission:** The Prime Contractor shall email the completed project Excel spreadsheet to both the Project Engineer and the CDOT Civil Rights Contract Compliance Manager, Mónica Vialpando (monica.vialpando@state.co.us).

Step 1: Confirming Reporting Requirements

Any Prime Contractor and subcontractor (regardless of tier) performing on-site work on active CDOT Federal-Aid Highway Construction projects **where the value of their individual contract or subcontract is \$10,000 or greater** during the final full pay period of July 2026 must be reported. This is required only for projects receiving FHWA-federal funding. Solely state-funded projects do not need to complete FHWA 1391. Organizations performing only professional services and no onsite labor **do not** need to complete the FHWA 1391 Report.

Prime Contractors are responsible for submitting their own workforce data and ensuring all subcontractors comply with these reporting requirements. Subcontractors will complete their individual FHWA-1391 Excel spreadsheets; the Prime Contractor is then responsible for collecting these completed documents, consolidating both the Prime and subcontractor data into a single master project report, and submitting the final Excel form for the project.

Step 2: How to Complete the Excel Form

Prime Contractors and subcontractors will complete the information on the attached Excel spreadsheet for each active CDOT/CCD FHWA-funded construction project.

- **Green Shading:** Columns and rows shaded in green are locked and the program will automatically total individual columns

- **File Format:** Once all information is complete, select 'File' and 'Save As' in Excel, and save the form as an Excel Spreadsheet (.xls or .xlsx). **Do not save or submit forms in .pdf format, they will not be accepted.**

Workforce Inclusions and Restrictions:

- **Non-Prevailing Wage Personnel:** Be sure to include any personnel in non-prevailing wage Job categories (such as company officials, management, superintendents, or clerical staff) who do not appear on certified payrolls but are assigned exclusively to the project.
- **DO NOT** include project personnel if they are on the project only from time to time and do not have daily, on-site responsibility for project activity.
- **DO NOT** include home office personnel unless they are assigned exclusively to a project and appear on project payroll.
- **DO NOT** count project personnel or company trainees as apprentices or OJT's unless they are currently enrolled in a recognized and approved (by CDOT, US Department of Labor and/or FHWA) training program.
- **DO NOT** include OJT trainees/apprentices in Table A. Table B and C should be filled out and must correspond to one another.

Block-by-Block Instructions

Block 1: Check 'Contractor' or 'Subcontractor' (can also check both if acting as both a Prime and a Subcontractor on a project).

Block 2: Fill in the name and address, including city and state, of the contracting company.

Block 3: Enter the CDOT sub-account project (five-digit) number for the information being submitted.

Block 4: Enter the total dollar value of the project. This will be the amount for each contract or subcontract.

Block 5: Enter the region and location of the project (including county and city).

Table A: Enter the number of hired employees based on their race, gender, and job category. DO NOT include OJT and Apprentice information in this section.

Table B: Enter the number of Apprentices and OJT Trainees hired for the project based on race, gender, and job category. The amounts in this Table should match the amounts in Table C.

Table C: Enter the number of Apprentices and OJT Trainees hired for the project based on race and gender. The amounts in this Table should match the amounts in Table B.

Block 8: Enter the name and title of the employee responsible for entering the information on the form. Reminder, original documentation shall be signed and maintained by Contractors and subcontractors for a minimum period of 3 years.

Block 9: Enter the date that the report was completed.

Block 10: This section is for CDOT Office Use ONLY.

For questions regarding submission of the FHWA 1391 Report, please contact:

Mónica Vialpando by email at monica.vialpando@state.co.us or by phone at 720-668-0367.

Reference Guides

1. Job Categories and Classification Examples

All employees on a project should have an assigned job category. Use the following definitions and examples to correctly classify the project workforce:

- **Officials (Managers):** Employees with management level responsibilities/authority; i.e. Officers, Project Engineers, Superintendents, etc.
- **Supervisors:** Any and all levels of supervision between management and foreman levels.
- **Foreman/Forewoman:** Men/Women directly in charge of laborers performing work on the project.
- **Mechanics:** Personally assisting with equipment service and/or maintenance.
- **Laborers, Semi-skilled:** All laborers classified by specialized work type.
- **Laborers, Unskilled:** All non-classified laborers.
- **Others:** Any other job categories are to be included in the most appropriate category listed previously.

Classification Examples:

- Air tool operators and operators of power pavement saws, form setters, etc. should be listed as “Laborers – semi-skilled”
- Operators of paint striping trucks are not painters and should be listed as either “Truck Drivers” or “Equipment Operators”
- Flaggers should be listed as “Laborers – unskilled”
- Form builders are carpenters
- Form setters are laborers – Semi-Skilled
- Concrete finishers are cement masons
- Welders are included in ironworkers
- List the employees who work in multiple classifications only once and in the classification in which they work the most frequently
- Professional services with no Davis-Bacon classifications are not required to report

2. Race/Ethnic Identification Guidelines:

- **Black or African American (Not Hispanic or Latino)** - A person having origins in any of the black racial groups of Africa.
- **Hispanic or Latino** - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.
- **American Indian or Alaska Native (Not Hispanic or Latino)** - A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- **Asian (Not Hispanic or Latino)** - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- **Native Hawaiian or Other Pacific Islander (Not Hispanic or Latino)** - A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **Two or More Races (Not Hispanic or Latino)** - All persons who identify with more than one of the above five races.

3. **White (Not Hispanic or Latino)** - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Self-Identification Rules:

- Employees are encouraged to only check one racial/ethnic identifier.
- If an employee claims to belong to two or more categories, they should select the 'Two or More Races' option.
- If an employee is a member of two or more groups but self identifies with only one category, then they would select only the category they most identify with.
- If an employee identifies as 'multi-racial' they will select 'Two or More Races'
- In the event an employee declines to self-identify, Contractors can use employment records to determine race/ethnicity.