



INDIANA DEPARTMENT OF TRANSPORTATION

100 North Senate Avenue
Room N758-CM
Indianapolis, Indiana 46204

www.in.gov/indot/

Eric Holcomb, Governor
Michael Smith, Commissioner

May 23, 2024

CONSTRUCTION MEMORANDUM 24-05

TO: District Deputy Commissioners
District Construction Directors
District Area Engineers
District Project Engineers/Supervisors/Managers
District Testing Engineers

FROM: Gregory G. Pankow, P.E., Chief Engineer of Construction
Division of Construction Management and District Support

SUBJECT: Build America, Buy America – Material Categories

Construction Memorandum 24-02 describes and provides background on the Build America, Buy America portion of the Infrastructure Investment and Jobs Act (IIJA). Part of the Act requires that certain materials permanently incorporated into the work must comply with the Build America or Buy America requirements. Categories of materials consist of a Steel or Iron Product, a Manufactured Product, a Construction Material, or Exempt. To provide transparency and clarification, INDOT Division of Materials and Tests has categorized all 3,400+ active material codes into one of these four categories. The categorization is subject to change at any time as this is an evolving interpretation.

A link to a spreadsheet titled “Materials Classification for BABA (Build America, Buy America)” has been provided on the INDOT Division of Materials and Tests internet webpage:

<https://www.in.gov/indot/doing-business-with-indot/contractorsconstruction/division-of-materials-and-tests/>

This spreadsheet contains five tabs:

1. all material codes,
2. materials that INDOT considers steel or iron and thus require a Buy America Certification,
3. materials that INDOT considers Manufactured Products and currently have a federal exemption,
4. materials that INDOT considers Construction Materials and thus require a Build America Certification,
5. and materials that INDOT considers Exempt (no Build America or Buy America Certifications required) based on the definition of exempt in the IIJA guidance.

Any questions should be directed to your assigned Construction Management Field Engineer.

GGP/JJN/jer