

CCTA DBE Goal Methodology 2023-2025

The overall DBE goal for fiscal years 2023 through 2025 is 0.016% of the FTA funds (excluding funds spent with Transit Vehicle Manufacturers) expected to be awarded.

The calculation is

\$ 9,258,032
<u>x 0.00016</u>
\$ 1,481.29

Federal Regulatory Requirements:

49 CFR §26.45:

(2)(b) Your overall goal must be based on demonstrable evidence of the availability of ready, willing and able DBEs relative to all businesses ready, willing and able to participate on your DOT assisted contracts. The goal must reflect your determination of the level of DBE participation you would expect absent the effects of discrimination.

The methodology the CCTA chose to use for our 2023-2025 DBE goal was Census and DBE Directory information.

Goal Methodology Requirements:

1. Detailed list of contracting and subcontracting opportunities
A list is attached.
2. Identification of the geographic market area
For our Local Market Area, we included Calhoun County, Kalamazoo County and Kent County. Kent County was included as it contains Grand Rapids, which is the largest metropolitan area on this side of the state. The majority of our contracts are from the greater Kalamazoo area, but we do require services outside of our area occasionally. The area was chosen based on past contracts, bid responses, and vendors/contractors' willingness to travel to Kalamazoo based on contract size.
3. Step 1 Base Figure
According to page 5110 Federal Reg. Vol. 64, No 21, February 2, 1999, the formula is the budget percentage x (# of DBE firms/# of all firms in market area). Our straight base figure before weighting (9 ÷ 9,935) is 0.09%. We used the County Business Pattern and MUCP Directory. We used weighting in our base figure to calculate how much money will be spent in each NAICS code. We also sorted DBEs in the Michigan Unified Certification Program (MUCP) website to determine which DBEs were likely to be judged ready, willing, and able to work in Kalamazoo. This gives us a more accurate base figure of 0.032%.
4. List of all sources used to establish the goal

We used the [NAICS Identification tool](#) to determine the appropriate NAICS codes; the US Census website to find the [County Business Patterns](#) data; our financial software to determine which contractors we have done business with and our bidders list to find out which vendors have bid on past projects to determine our local market area; the [MUCP website](#) to determine available DBEs in our market; and our operating and capital budget plans to determine projects in the appropriate three-year timeframe.

5. Step 2 Adjustment

We adjusted our base figure of 0.032% to 0.016%:

1. Past three years participation.

In 2020 our DBE participation was 0.0%.

In 2021 our DBE participation was 8.38% (single contract)

In 2022, our DBE participation was 0.0% (only includes June Uniform Report).

2. Average of Median and Adjusted Base Figure.

$$0.032\% + 0.00\% = 0.032\%$$

$$0.032\% \div 2 = 0.016\%$$

We also reviewed the DBE goals for the Interurban Transit Partnership (2.27%) and Battle Creek Transit (0.0156%).

6. Race-conscious/race-neutral breakdown.

Our DBE participation will be met solely through race-neutral means. The regulations require that goals be based on demonstrable evidence of relative availability of DBEs in our market. We have very few DBEs in our market; therefore, we feel contract goals would not increase DBE participation.

7. Meaningful Consultation

In our FY2023-2025 DBE Goal, we conducted a public meeting, inviting local stakeholders explaining our DBE goal setting methodology.

8. Publication

We published our overall goal on our website.

https://www.kmetro.com/sites/default/files/public/2023_2025_dbe_public_notice.pdf