Disadvantaged Business Enterprise (DBE) Program Federal Fiscal Years (FFY) 2024-2026 Goal Methodology

Introduction

In accordance with Federal Regulation 49 CFR Part §26 26.45(f)(3), the Greater-Attleboro Taunton Transportation Authority (GATRA) submits its three-year Disadvantaged Business Enterprise (DBE) overall goal for FFY 2024-2026 on projected contracting opportunities funded, in whole or in part, by the Federal Transportation Administration (FTA), along with the methodology and supporting documentation for review.

Proposed DBE Goal FFY 2021-2023

GATRA's overall goal for the period of Federal Fiscal Year (FFY) 2024-2026 (October 1, 2024, through September 30, 2026) is 7.49%. GATRA expects to award approximately \$6,804,555.39 and it is expected that 7.49% will be expended with DBEs on GATRA DOT-assisted contracts during the next three fiscal years. Of the overall goal, 0.0% will be achieved through race-conscious measures and 7.49% will be achieved through race neutral measures.

Goal Setting Methodology

GATRA's overall goal was set based on the two-step process as described in 49 CFR 26.45. This process ensures that GATRA's goal is based on the availability of ready, willing, and able DBEs in its relevant market.

Step One: Determination of Base Figure

Determination of Market Area and Sources of Information

GATRA determined its market area to be the State of Massachusetts and the State of Rhode Island.

GATRA used two sources of information to determine the availability of total firms and the number of DBEs certified in its market area. These data sources represent the most relevant information available related to GATRA's service area. GATRA did not have any additional DBE companies to add to the analysis from internal data.

1. GATRA is part of a Unified Certification Program (UCP) with the Commonwealth of Massachusetts and the Massachusetts Department of Transportation (MassDOT). The Commonwealth's Supplier Diversity Office (SDO) certifies Disadvantaged Businesses and keeps a directory of these businesses on their website which can be downloaded. This is a searchable directory in which DBE certified business can be sorted by NAICS code.

2. To calculate all firms within the same geographic region GATRA used 2020 Census Data. GATRA utilized the census database site (data.census.gov) to breakdown each category for detailed statistics for every NAICS code for the total number of firms available in Massachusetts and Rhode Island.

In the Step One analysis, GATRA determined the percent of total FTA funds related to each NAICS code. Then GATRA calculated the relative availability of DBEs in specific project-related areas using the SDO database and NAICS codes from the Census data. The relative availability of DBEs was then multiplied by the weight determined by the total FTA funds by NAICS code. This provided a weighted base figure for each NAICS code as well as an overall weighted base figure for the goal. A summary of the calculation of this step is provided in the tables below.

		FTA Funds on	% Weight of
NAICS	Description	Project	FTA funds
221114	Solar Electric	\$750,000.00	0.1102
236220	Commercial and Institutional Building Construction	\$2,000,000.00	0.2939
238210	Electrical and Other Wiring Installation Contractors	\$400,000.00	0.0588
238220	Plumbing, Heating, and Air-Conditioning Contractors	\$200,000.00	0.0294
238310	Drywall and Insulation Contractors	\$100,000.00	0.0147
238320	Painting and Wall Covering Contractors	\$135,000.00	0.0198
238350	Finish Carpentry Contractors	\$50,000.00	0.0073
238910	Site Preparation Contractors	\$250,000.00	0.0367
323111	Commercial Printing (except Screen and Books)	\$22,000.00	0.0032
424720	Operator Gasoline & Petroleum	\$1,100,075.00	0.1617
488490	Snow Removal	\$75,000.00	0.0111
524126	Insurance	\$639,891.14	0.0941
541330	Engineering Services	\$500,000.00	0.0735
561720	Janitorial Services	\$57,681.25	0.0085
561730	Landscaping Services	\$48,420.00	0.0071
562111	Solid Waste Collection	\$476,488.00	0.0700
		•	
	TOTALS	\$6,804,555.39	1.0000

As shown in the table above, GATRA identified its capital and operating projects planned for FY 2024-2026, including the federal funds estimated to be used in each project.

GATRA has three large projects for this goal setting period. Funding for these projects is from federal sources. Two of the three projects will be derived from 5339 Bus & Bus Maintenance Facilities with the balance of three projects coming from 5307 formula funds. A brief narrative description of these projects, along with a corresponding cost and timeframe, is as follows:

1. Wareham Operations and Maintenance Facility (FFY 2024 - FFY 2026)

In order to address vehicle maintenance demand, circumvent deadhead trips for maintenance, and enhance the passenger experience, GATRA purchased a location for operations and vehicle maintenance in its South Shore service area. GATRA will design and construct a new facility on a site purchased in Wareham, MA. The current estimate for this work is approximately \$3,600,000 to be derived from 5339 and 5307 formula funds.

2. Attleboro Pedestrian Bridge / Sidewalk Design & Construction (FFY 2025)

The City of Attleboro and GATRA wish to provide a convenient and accessible pedestrian gateway to the Attleboro Intermodal Transportation Center via the construction of a pedestrian bridge over the Ten Mile River linking to a pedestrian sidewalk with traffic mitigation, including new signals and crosswalks. This work is estimated to cost approximately \$1,103,600 to be derived from 5307 formula funds.

3. Taunton Maintenance Facility Solar Upgrades (FFY 2026)

GATRA needs to build out solar arrays on both the roof and adjacent land parcel to meet the growing demand for electricity as more of the fleet goes electric. This work is estimated to cost approximately \$1,500,000 to be derived by 5339 and 5307 formula funds.

Additionally, prime and subcontract opportunities may also exist for operating purchases such as janitorial services, waste collection, snow removal, IT consulting and parts, gasoline, and other operator parts and supplies. Further, GATRA will ensure that its prime contractors are aware of the need to evaluate the use of DBE financial institutions.

			# of all firms	
		# of	available	
		Available	(including	Relative
NAICS	Description	DBE's	DBE's)	availability
221114	Solar Electric	0	9	0
236220	Commercial and Institutional Building Construction	53	867	0.0611
238210	Electrical and Other Wiring Installation Contractors	46	2825	0.0163
238220	Plumbing, Heating, and Air-Conditioning Contractors	11	3425	0.0032
238310	Drywall and Insulation Contractors	19	675	0.0281
238320	Painting and Wall Covering Contractors	42	1108	0.0379
238350	Finish Carpentry Contractors	26	1123	0.0232
238910	Site Preparation Contractors	71	1338	0.0531
323111	Commercial Printing (except Screen and Books)	15	421	0.0356
424720	Operator Gasoline & Petroleum	4	45	0.0889
488490	Snow Removal	12	54	0.2222
524126	Insurance	1	229	0.0044
541330	Engineering Services	136	1695	0.0802
561720	Janitorial Services	39	1910	0.0204
561730	Landscaping Services	31	4893	0.0063
562111	Solid Waste Collection	7	307	0.0228
		513	20924	0.7037

NAICS	Description	% Weight of FTA funds	Relative	Weighted Base
221114	Description Solar Electric	0.1102	availability 0	Figure 0.0000
236220	Commercial and Institutional Building Construction	0.1102	0.0611	0.0180
238210	Electrical and Other Wiring Installation Contractors	0.0588	0.0163	0.0010
238220	Plumbing, Heating, and Air-Conditioning Contractors	0.0294	0.0032	0.0001
238310	Drywall and Insulation Contractors	0.0147	0.0281	0.0004
238320	Painting and Wall Covering Contractors	0.0198	0.0379	0.0008
238350	Finish Carpentry Contractors	0.0073	0.0232	0.0002
238910	Site Preparation Contractors	0.0367	0.0531	0.0019
323111	Commercial Printing (except Screen and Books)	0.0032	0.0356	0.0001
424720	Operator Gasoline & Petroleum	0.1617	0.0889	0.0144
488490	Snow Removal	0.0111	0.2222	0.0025
524126	Insurance	0.0941	0.0044	0.0004
541330	Engineering Services	0.0735	0.0802	0.0059
561720	Janitorial Services	0.0085	0.0204	0.0002
561730	Landscaping Services	0.0071	0.0063	0.0000
562111	Solid Waste Collection	0.0700	0.0228	0.0016
		1.0000	0.7037	0.0474

Step Two: Adjustment

In accordance with 49 CFR §26 26.45(d)(1) (I), after arriving at the preliminary base figure of 4.74%, GATRA reviewed and assessed other data to determine if the base figure should be adjusted. GATRA considered past participation and available disparity studies.

Past Participation - GATRA examined the current capacity of DBEs to perform work on FTA assisted contracts based on the contract awards in the last three(3) federal fiscal years (FFY2020-FFY2022).

2020	7.34%	0.00 RC	7.34 RN
2021	15.35%	0.00 RC	15.35 RN
2022	8.01%	0.00 RC	8.01 RN

The projects analyzed in Step 1 for 2024-2026 are similar to the projects undertaken from 2021-2023. Therefore, GATRA has made the following adjustment to its baseline goal utilizing the average participation achieved from 2018-2019:

Step 1 Baseline Goal	4.74%
Average Past DBE Participation	10.23%
Adjustment to Step 1 Baseline Goal	(4.74%+10.23%)/2
FINAL GOAL	7.49%

Disparity Studies - GATRA researched disparity studies done for the Commonwealth of Massachusetts and could only find one for our state. This study was done by NERA Economic Consulting for the Commonwealth's Division of Capital Asset Management and Maintenance in December 2017. *Business Disparities in the DCAMM Construction and Design Market Area* shows evidence of racial disparity in the market area. The disparity ratio cited in the study for Construction related businesses was 0.682¹. GATRA has not adjusted its goal as a result of the data available in this study. GATRA will review and utilize any updated data in preparing future goals.

Additional data on employment, self-employment, education, training, and union apprenticeship programs were examined both with the NERA Economic Consulting study and data from the updated 2017 Survey of Business Owners (SBO) Census Data (the study contains 2020 SBO data). The evidence confirms the continuing disparity in all these areas against disadvantaged business, as well as discrimination in union apprenticeship programs.

Race-Neutral and Race Conscious Division

GATRA has projected the race neutral (RN) portion of its 7.49% overall goal to be 7.49%. It is projected that no race conscious (RC) participation will be required to achieve the overall goal of 7.49%. GATRA determined its RN projection based on a review of its RN participation from FY 2020, 2021 & 2022. GATRA achieved an average of 10.23% RN participation, accounting for 100% of the total DBE participation. GATRA anticipates a similar scope of projects for the next three fiscal years and therefore used the average FY 2021-23 RN participation to project its RN and corresponding RC goals.

Proof of Publication

GATRA published a notice announcing the DBE goals that it has established as a part of the DBE program of each applicable federal fiscal year (FFY24-26) on its website (wwww.gatra.org). The goal will be actively shared with the local Chambers, Minority Activist groups, and promoted on the Authority's Facebook page.

The notice informed the public that a DBE participation program – including DBE goals and a description of how these goals were developed – is available for inspection during normal business hours at the office of the Greater Attleboro Taunton Regional Transit Authority through November 17, 2023. GATRA and the Department of Transportation will accept comments throughout this period.

Minority/Women Contracting Groups

GATRA works with several local Chambers of Commerce, including the United Chamber of Commerce (Attleboro), One SouthCoast Chamber of Commerce, and the Taunton Area Chamber of Commerce to assist in identifying Chamber members and small business associations in the area. GATRA is actively involved with all three of these local Chamber of Commerce for outreach and to establish relationships with small and minority owned businesses.

¹ NERA Economic Consulting, 2017, Table 6.5, pg. 178.

In addition to the local Chamber of Commerce organizations, GATRA also participates in the Unified Certification Program (UCP) managed by MassDOT. The UCP provides DBE certification for eligible business and conducts outreach and training across the state. GATRA also uses the database maintained by the UCP to locate DBE-certified businesses.

To improve the impact of outreach efforts, GATRA collaborates with peer Regional Transit Authorities to create greater interest in RTA projects from the DBE community. GATRA intends to continue building these partnerships.