

Fiscal Year 2023 – Fiscal Year 2025

DBE Goal Update

OVERALL GOAL CALCULATION

Name of Recipient: North Central Texas Council of Governments

Goal Period: October 1, 2022 through September 30, 2025

Anticipated U.S. DOT-Assisted Contract Amount: Approximately \$42.18M

The North Central Texas Council of Governments (NCTCOG) anticipates awarding approximately \$42.18 million in contracting opportunities across all funding sources. Contracting opportunities for this goal period include anticipated procurements NCTCOG will complete as well as anticipated procurements subrecipients will complete. Table 1 provides a delineation of contract awards between the Federal Transit Administration (FTA) and other federal and local sources. Contracting opportunities for other federal and local sources could include funding from the Federal Highway Administration (FHWA), , and other federal and local sources ⁽¹⁾.

Table 1. Anticipated Contract Awards by Funding Source

Funding Source	Total Anticipated Contract Awards
Federal Transit Administration	\$26,073,331
Other Federal and Local Sources	\$16,103,000
TOTAL	\$42,176,331

For the Fiscal Year (FY) 2023 – FY 2025 goal period NCTCOG has included anticipated contract opportunities for its subrecipients – those entities receiving financial assistance to help carry out the activities of a federally-funded program. Examples of subrecipients would include small transit providers, cities, counties, independent school districts, etc. NCTCOG will coordinate with subrecipients who are receiving federal funds through a subaward to ensure appropriate contract goals, where appropriate, are being set to ensure compliance with NCTCOG's DBE goal.

Overall DBE Goal: 17.0%

NCTCOG has an overall DBE Goal of 17.0%. This overall goal is weighted based on contract awards for all funding sources. Table 2 includes a delineation of overall DBE goals between the FTA and other federal and local sources.

Table 2. DBE Goal by Funding Source

Funding Source	DBE Goal
Federal Transit Administration	9.8%
Other Federal and Local Sources	26.6%

⁽¹⁾ To the extent that funding sources have DBE related provisions that require specific DBE participation goals, those provisions prevail.

Anticipated Overall DBE Expenditures: Approximately \$7.16M

An overall DBE goal of 17.0% results in an anticipated overall DBE Expenditure of approximately \$7.16 million. Table 3 calculates the anticipated DBE expenditures. This information is calculated based on the Anticipated Contract Awards by Funding Source in Table 1 and the DBE goal by Funding Source provided in Table 2.

Table 3. Anticipated DBE Expenditures by Funding Source

Funding Source	Anticipated DBE Expenditures
Federal Transit Administration	\$2,563,671
Other Federal and Local Sources	\$4,288,224

Pursuant to Section 49 Code of Federal Regulations Part 26, the North Central Texas Council of Governments (NCTCOG) has proposed an overall goal of 17.0% for the participation of Disadvantaged Business Enterprises (DBEs) in its Transportation Department contracts funded by the U.S. Department of Transportation (DOT), through the Federal Aviation Administration (FAA), Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA), effective October 1, 2022 through September 30, 2025.

Table 4 summarizes the categories of upcoming procurements, and the funding sources anticipated to cover contract awards for FY 2023 - FY 2025.

Table 4. Procurement Categories by Funding Source

Procurement Category	Federal Transit Administration	Other Federal and Local Sources
Construction	X	
Marketing, Advertising, and Public Outreach Services	X	X
Office Supplies & Equipment	X	X
Operational Administrative, Communications, Support Services	X	
Planning/Engineering		X
Software and Ancillary Information Technology Professional Services	X	X
Transportation Equipment	X	
Vehicle Maintenance and Operations Support	X	

For FTA-assisted vehicle procurements, vehicle manufacturers must certify compliance with 49 CFR Part 26. Procurements for transit vehicles will not be considered in calculating the overall DBE goal.

It is the policy of NCTCOG to award a fair share of contract awards to DBE firms without regard to the funding source utilized. NCTCOG will apply the principles of the DBE program for non-U.S. DOT-assisted contracting and service provision opportunities to the fullest extent possible.

MARKET AREAS

Two separate market areas were considered in the DBE Availability Analysis:

- 1) NCTCOG Market Area, and
- 2) Subrecipient Market Area

This is due to the nature of services and expected contractors for NCTCOG initiated procurements versus those initiated by NCTCOG's subrecipients.

Determination of NCTCOG's Market Area

The market area for the DBE availability analysis is the Dallas-Fort Worth-Arlington Metropolitan Statistical Area (MSA) which includes Collin, Dallas, Denton, Ellis, Hood, Hunt, Johnson, Kaufman, Parker, Rockwall, Somervell, Tarrant, and Wise counties. DBE availability was determined utilizing data from the Texas Uniform Certification Program (TUCP). Firms certified through the TUCP identify work districts and regions where they conduct business. Several firms do business in multiple work districts and regions throughout the State.

The Dallas-Fort Worth-Arlington MSA was used as the market area because:

- a. A substantial majority of the bidders (contractors and subcontractors) are based in the Dallas-Fort Worth region and
- b. A substantial majority of the contracting dollars will be expended in the Dallas-Fort Worth region.

Determination of Subrecipient's Market Area

The market area for the subrecipient's DBE availability analysis was defined by the service areas of the small transit providers – Denton, Ellis, Hunt, Johnson, Kaufman, Navarro, Palo Pinto, or Parker Counties. DBE availability was determined by utilizing data from the TUCP.

The counties of Denton, Ellis, Hunt, Johnson, Kaufman, Navarro, Palo Pinto, and Parker are used as the market area because:

- a. A substantial majority of the bidders (contractors and subcontractors) are based in those counties.
- b. A substantial majority of the contracting dollars will be expended in the counties of Denton, Ellis, Hunt, Johnson, Kaufman, Navarro, Palo Pinto, and Parker.

METHODOLOGY

The methodology employed to develop the overall DBE Goal for FY 2023 – FY 2025 was a two-step process. First, NCTCOG analyzed data to develop a percentage of ready, willing, and able DBE firms in NCTCOG's and Subrecipient's market area to perform the work anticipated to be awarded during this period. NCTCOG projected the types of procurements and potential contract awards and developed data to determine the number of DBE firms ready, willing, and able to perform those functions. NCTCOG

assumed that a DBE firm was ready, willing and able to perform the types of work anticipated if the firm had a current DBE certification for that business classification code. The Step 1 figure was developed without regard to the previous DBE goal, past performance, or the national aspirational goal. NCTCOG reviewed DBE availability, by market area, weighted by the value of the potential contract award compared with a non-weighted average. The result of Step 1 was the development of a base figure for the DBE goal.

Second, in order to develop a more precise DBE goal, NCTCOG analyzed data to determine whether any adjustments to the base figure were warranted. NCTCOG reviewed other agencies DBE goals, reviewed NCTCOG's past performance on DBE participation, and reviewed NCTCOG's previous participation goals and associated availability. These items were evaluated to determine whether to adjust the base figure developed under Step 1.

STEP 1

In order to determine an overall goal, the following data sources were utilized to determine a base figure for the relative availability of DBEs:

- 2019 Dallas-Fort Worth-Arlington Metropolitan Statistical Area Business Patterns
 - <https://www.census.gov/data/datasets/2019/econ/cbp/2019-cbp.html>
- State of Texas – Texas Unified Certification Program (TUCP) DBE Directory
 - <https://txdot.txdotcms.com/FrontEnd/VendorSearchPublic.asp?TN=txdot&XID=2340>

After identifying the anticipated types of contracts that will be awarded in FY 2023 – FY 2025, Business Pattern Data for all firms in the Dallas-Fort Worth-Arlington MSA was identified for the applicable contracting areas. The Dallas-Fort Worth-Arlington MSA, by market area, was used as the local market area, since the majority of contractors and subcontractors that bid on NCTCOG and subrecipient procurements are located in this area. The TUCP consolidates all DBE firms certified by six different agencies into one centralized DBE Directory for DOT funded contracts.

The initial calculation of DBE availability was accomplished using data from the most recent County Business Pattern Data for the Dallas-Fort Worth-Arlington MSA (2019), by market area, and the TUCP data. The North American Industry Standard Classification (NAICS) codes used in the calculation for the DOT-assisted contracts for FY 2023 – FY 2025 are reflected in Table 5.

Table 5 below identifies the potential contracting opportunities, number of DBE firms, total firms, and percentage of DBE firms by type of work. Since the DBE percentages and potential contract awards by type of work are not uniform, NCTCOG weighted the DBE availability by the amount of the potential contract awards and market area. Table 5.1 is a summary of only NCTCOG procurements funded with Federal Transit Administration funds, and Table 5.2 includes a summary of Subrecipient procurements funded with Federal Transit Administration funds. Table 6 is a summary of NCTCOG procurements funded with all other funding sources.

Table 5
DBE Availability Analysis –
Anticipated Contracting Opportunities for Federal Transit Administration Awards
NCTCOG & Subrecipients

NAICS	Type of Work	\$ of Contract (Projected)	Total DBE Firms	Total Firms	DBE %
Construction^					
236220	Commercial and institutional building construction		413	975	
237110	Drainage Contractors		201	201	
238110	Concrete Foundation/Structural Contractors		232	450	
238120	Structural Steel (Rebar) Contractors		100	102	
238130	Framing Contractors		54	160	
238150	Glass/Glazing Contractors		11	160	
238160	Roofing Contractors		52	721	
238220	Plumbing/HVAC Contractors		70	2136	
238210	Electrical contractors and other wiring installation contractors		198	1437	
238310	Drywall & Insulation Contractor		71	327	
238320	Painting Contractors		116	408	
238910	Site Preparation Contractors		272	493	
238990	Sidewalk construction, residential and commercial		293	679	
238390	Other Building Equipment Contractors	\$4,105,000	38	189	
327390	Other Concrete Product Manufacturing		7	40	
332312	Fabricated Structural Steel		19	88	
423690	Electrical contractors and other wiring installation contractors		23	391	
423730	HVAC Wholesalers		8	169	
541310	Architectural Services		97	494	
541320	Landscape Architectural Services		72	109	
541330	Engineering Services		634	1285	
541370	Surveying and Mapping		122	143	
541618	Project/Construction Management		282	445	
561730	Landscaping services		196	1530	
561990	Fire Protection (other services)		81	210	
811310	Construction Machinery		21	361	
812930	Parking Lots		16	197	
			3699	13900	26.6%
Marketing, Advertising, and Public Outreach Services*					
(including specialty print services, sign manufacturing, and advertising agency support; and printing and postage costs)					
323111	Commercial printing		10	340	
323113	Commercial screen printing	\$191,051	6	104	
339950	Sign manufacturing		8	158	
541810	Advertising Agencies		14	321	
			38	923	4.1%

Office Supplies & Equipment (Rental & Purchase)*				
443142	Electronic stores		3	433
453210	Office Supplies and stationery stores	\$429,358	6	77
532420	Office Machinery and equipment rental and leasing		2	16
			<u>11</u>	<u>526</u>
				2.1%
Operational Administrative, Communications, Support Services*				
(includes: insurance; uniforms; security, janitorial, landscaping, pest control services; communication services; audit services; building maintenance; training; and specialty trade contractors for general operations support)				
561621	Security Systems Services (except Locksmiths)		9	190
561622	Locksmith Services		2	95
561720	Janitorial services		46	895
561730	Landscaping services		46	1243
561710	Exterminating and pest control services		1	269
561740	Carpet and upholstery cleaning services		12	101
561421	Telephone answering services		1	23
561990	All other support services		17	169
541211	Offices of Certified Public Accountants		11	1020
517110	Wired telecommunications carriers		3	852
517312	Wireless Telecommunications Carriers (except Satellite)		0	661
517919	All Other Telecommunications	\$2,602,822	5	37
	Other Commercial and Industrial Machinery and Equipment			
532490	Rental and Leasing		10	251
524126	Direct property and casualty insurance carriers		3	201
611692	Automobile driving schools		1	54
621999	All other miscellaneous ambulatory health care services		4	106
	Uniforms (except athletic), men's and boys', merchant			
424320	wholesalers		2	407
448190	Industrial Launderers		1	183
238220	Plumbing, heating and air-conditioning contractors		25	1815
238210	Electrical contractors and other wiring installation contractors		50	1222
811212	Electronic and Precision Equipment Repair and Maintenance		6	82
811412	Appliance repair and maintenance		1	65
			<u>256</u>	<u>9941</u>
				2.6%
Software and Ancillary Information Technology Professional Services*				
511210	Software Publishers		19	298
541511	Computer Software Programming Services	\$1,059,507	214	2234
541512	Computer Systems Design Services		282	2313
541519	Other Computer Related Services		150	243
			<u>665</u>	<u>5088</u>
				13.1%
Transportation Equipment^				
423860	Transportation Equipment and Supplies (except Motor Vehicle)			
	Merchant Wholesalers			
	(except Motor Vehicle) Merchant Wholesaler	\$13,720,800	19	109
423110	Automobile and other motor vehicle merchant wholesalers		3	142
			<u>22</u>	<u>251</u>
				8.8%
Vehicle Maintenance and Operations Support*				
(includes: tires; engine oils, fluids, stock parts, stock supplies, shop tools for preventative maintenance; vehicle graphics; towing; fuel; and preventative maintenance)				
423130	Tires, new, motor vehicle, merchant wholesalers (heavy truck)		2	55
	Service establishment equipment and supplies merchant	\$3,964,793		
423850	wholesalers		13	93

441320	Truck tires and tubes dealers (except heavy truck)	3	379	
441310	Truck tires and tubes dealers (except heavy truck)	3	642	
454310	Fuel Dealers	1	46	
488410	Towing services, motor vehicle	0	139	
811111	General Automotive Repair	8	1215	
		<u>30</u>	<u>2569</u>	1.2%
	TOTAL	\$26,073,331	4721	33198
				14.2%

Weighted by Contract Award

9.8%

^Numbers reflect firms serving or located in the Dallas-Fort Worth-Arlington Metropolitan Statistical Area.

*Numbers for DBE and Total Firms located in located in Dallas, Denton, Ellis, Hunt, Johnson, Kaufman, Navarro, Palo Pinto, Parker or Tarrant counties.

Table 5.1
DBE Availability Analysis –
Anticipated Contracting Opportunities for Federal Transit Administration Awards
NCTCOG

NAICS	Type of Work	\$ of Contract (Projected)	Total DBE Firms^	Total Firms^	DBE %
Transportation Equipment					
423860	Transportation Equipment and Supplies (except Motor Vehicle) Merchant Wholesalers (except Motor Vehicle) Merchant Wholesaler	\$13,000,000	19	109	
423110	Automobile and other motor vehicle merchant wholesalers		3	142	
			22	251	8.8%
	TOTAL	\$13,000,000	22	251	8.8%

Weighted by Contract Award

8.8%

^Numbers reflect firms serving or located in the Dallas-Fort Worth-Arlington Metropolitan Statistical Area.

Table 5.2
DBE Availability Analysis –
Anticipated Contracting Opportunities for Federal Transit Administration Awards
Subrecipients

NAICS	Type of Work	\$ of Contract (Projected)	Total DBE Firms	Total Firms	DBE %
Construction^					
236220	Commercial and institutional building construction		413	975	
237110	Drainage Contractors		201	201	
238110	Concrete Foundation/Structural Contractors		232	450	
238120	Structural Steel (Rebar) Contractors		100	102	
238130	Framing Contractors		54	160	
238150	Glass/Glazing Contractors		11	160	
238160	Roofing Contractors		52	721	
238220	Plumbing/HVAC Contractors		70	2136	
238210	Electrical contractors and other wiring installation contractors		198	1437	
238310	Drywall & Insulation Contractor		71	327	
238320	Painting Contractors		116	408	
238910	Site Preparation Contractors		272	493	
238990	Sidewalk construction, residential and commercial		293	679	
238390	Other Building Equipment Contractors	\$4,105,000	38	189	
327390	Other Concrete Product Manufacturing		7	40	
332312	Fabricated Structural Steel		19	88	
423690	Electrical contractors and other wiring installation contractors		23	391	
423730	HVAC Wholesalers		8	169	
541310	Architectural Services		97	494	
541320	Landscape Architectural Services		72	109	
541330	Engineering Services		634	1285	
541370	Surveying and Mapping		122	143	
541618	Project/Construction Management		282	445	
561730	Landscaping services		196	1530	
561990	Fire Protection (other services)		81	210	
811310	Construction Machinery		21	361	
812930	Parking Lots		16	197	
			3699	13900	26.6%
Marketing, Advertising, and Public Outreach Services*					
(including specialty print services, sign manufacturing, and advertising agency support; and printing and postage costs)					
323111	Commercial printing		28	404	
323113	Commercial screen printing		14	140	
339950	Sign manufacturing		27	180	
541810	Advertising Agencies		53	379	
541820	Public Relations Agencies		125	157	
541830	Media Buying Agencies	\$191,051	11	18	
541840	Media Representatives		9	36	
541850	Indoor and Outdoor Display Advertising		12	64	
541860	Direct Mail Advertising		17	66	
541870	Advertising Mail Distribution Services		14	28	

541890	Other Services Related to Advertising		56	197	
541910	Marketing Research/Public Opinion Polling		61	115	
			427	1784	23.9%
Office Supplies & Equipment (Rental & Purchase)*					
443142	Electronics and Appliance Retailers		13	505	
453210	Office Supplies and Stationery Retailers	\$429,358	15	105	
532420	Office Machinery and equipment rental and leasing		7	19	
			35	629	5.6%
Operational Administrative, Communications, Support Services*					
(includes: insurance; uniforms; security, janitorial, landscaping, pest control services; communication services; audit services; building maintenance; training; and specialty trade contractors for general operations support)					
561621	Security Systems Services (except Locksmiths)		35	217	
561622	Locksmith Services		2	95	
561720	Janitorial services		154	1076	
561730	Landscaping services		196	1530	
561710	Exterminating and pest control services		6	347	
561740	Carpet and upholstery cleaning services		28	131	
561421	Telephone answering services		5	31	
561990	All other support services		81	210	
541211	Offices of Certified Public Accountants		29	1226	
517110	Wired telecommunications carriers		3	852	
517312	Wireless Telecommunications Carriers (except Satellite)		0	661	
517919	All Other Telecommunications	\$2,602,822	16	55	
532490	Other Commercial and Industrial Machinery and Equipment Rental and Leasing		10	251	
524126	Direct property and casualty insurance carriers		5	246	
611692	Automobile driving schools		3	67	
621999	All other miscellaneous ambulatory health care services		16	141	
424320	Uniforms (except athletic), men's and boys', merchant wholesalers		8	73	
448190	Industrial Launderers		4	238	
238220	Plumbing, heating and air-conditioning contractors		70	2136	
238210	Electrical contractors and other wiring installation contractors		198	1437	
811212	Electronic and Precision Equipment Repair and Maintenance		20	114	
811412	Appliance repair and maintenance		1	86	
			890	11220	7.9%
Software and Ancillary Information Technology Professional Services*					
511210	Software Publishers		2	204	
541511	Computer Software Programming Services	\$1,059,507	41	1020	
541512	Computer Systems Design Services		73	1580	
541519	Other Computer Related Services		30	243	
			146	3047	4.8%
Transportation Equipment^					
423860	Transportation Equipment and Supplies (except Motor Vehicle) Merchant Wholesalers (except Motor Vehicle) Merchant Wholesaler	\$720,800	19	109	
			19	109	17.4%
Vehicle Maintenance and Operations Support*					
(includes: tires; engine oils, fluids, stock parts, stock supplies, shop tools for preventative maintenance; vehicle graphics; towing; fuel; and preventative maintenance)					
423130	Tire and Tube Merchant Wholesalers	\$3,964,793	5	72	

423850	Service establishment equipment and supplies merchant wholesalers	32	102		
441320	Truck tires and tubes dealers (except heavy truck)	3	474		
454310	Fuel Dealers	6	54		
488410	Motor Vehicle Towing	5	167		
811111	General Automotive Repair	20	1534		
		<u>71</u>	<u>2403</u>	3.0%	
	TOTAL	\$13,073,331	5287	33092	16.0%
	Weighted by Contract Award				12.7%

^Numbers reflect firms serving or located in the Dallas-Fort Worth-Arlington Metropolitan Statistical Area.

*Numbers for DBE and Total Firms located in located in Dallas, Denton, Ellis, Hunt, Johnson, Kaufman, Navarro, Palo Pinto, Parker or Tarrant counties.

Table 6
DBE Availability Analysis -
Anticipated Contracting Opportunities for Other Federal and Local Sources
NCTCOG

NAICS	Type of Work	\$ of Contract (Projected)	Total DBE Firms^	Total Firms^	DBE %		
Marketing, Advertising, and Public Outreach Services							
323111	Commercial printing		28	404			
323113	Commercial screen printing		14	140			
339950	Sign manufacturing		27	180			
541810	Advertising Agencies		53	379			
541820	Public Relations Agencies		125	157			
541830	Media Buying Agencies	\$1,800,000	11	18			
541840	Media Representatives		9	36			
541850	Indoor and Outdoor Display Advertising		12	64			
541860	Direct Mail Advertising		17	66			
541870	Advertising Mail Distribution Services		14	28			
541890	Other Services Related to Advertising		56	197			
541910	Marketing Research/Public Opinion Polling		61	115			
			427	1784	23.9%		
Office Supplies & Equipment (Rental & Purchase)							
443142	Electronics and Appliance Retailers		13	505			
453210	Office Supplies and Stationery Retailers	\$573,000	15	105			
532420	Office Machinery and equipment rental and leasing		7	19			
			35	629	5.6%		
Planning/Engineering							
488999	All support activities for Transportation		20	25			
541310	Architectural Services (Urban Planning)		97	494			
541330	Engineering Services		634	1285			
541430	Graphic Design Services		80	295			
541611	Administrative Management & General Management Consulting	\$10,725,000	672	2328			
541613	Marketing Consulting Services		180	1008			
541820	Public Relations Consulting/Agencies		125	157			
813312	Environment, Conservation & Wildlife preservation services		2	63			
			1810	5655	32.0%		
Software and Ancillary Information Technology Professional Services							
511210	Software Publishers		19	298			
541511	Computer Software Programming Services	\$3,005,000	214	2234			
541512	Computer Systems Design Services		282	2313			
541519	Other Computer Related Services		150	243			
			665	5088	13.1%		
		TOTAL	\$16,103,000	2937	13156	22.3%	
						Weighted by Contract Award	26.6%

^Numbers reflect firms serving or located in the Dallas-Fort Worth-Arlington Metropolitan Statistical Area.

STEP 2

The Step 2 analysis involved the consideration of data from the following sources: 1) DBE goals from other similar agencies in the Dallas-Fort Worth Market area; 2) analysis of NCTCOG's DOT assisted contracts for FY 2006 – FY 2022; and 3) NCTCOG's previous DBE participation goals and associated availability. These factors were used to determine if adjusting the Step 1 availability figure was necessary.

NCTCOG researched its market area for any disparity studies which may have been conducted in the last three years. No applicable disparity studies were identified.

NCTCOG reviewed the overall DBE goals of the following agencies:

Dallas Area Rapid Transit – overall DBE goal of 31% for FY 2020 – FY 2022.

Trinity Metro – overall DBE goal of 13% for FY 2020 - FY 2022.

Denton County Transportation Authority – overall DBE goal of 10% for FY 2022 – FY 2024.

NCTCOG also examined its overall DBE participation for FY 2006 - FY 2022. The average percentage of achievements for all similar projects are:

- 2006-2010 DBE contract expenditures is 24.1%
- 2011-2013 DBE contract expenditures is 24.5%
- 2014-2016 DBE contract expenditures is 24.63%
- 2017-2019 DBE contract expenditures is 33.69%
- 2020-2022 DBE contract expenditures is 14.78%

NCTCOG's DBE goal for the FY 2011 – FY 2019 timeframe has been 25% and DBE goal for FY 2022 – FY 2025 timeframe has been 19.4% based on the availability of ready, willing, and able DBE firms serving this market area. This data is for NCTCOG procurements only. NCTCOG does not propose to adjust the base figure for the following reasons:

- 1) A higher DBE goal is warranted for NCTCOG versus subrecipient procurements due to differences of market areas and types of services procured.
- 2) Based on existing transit authority goals, the more suburban/rural the transit authority services the lower the expected DBE goal.
- 3) There is not sufficient historical subrecipient data to make an adjustment. (Data will continue to be developed over the next three years).
- 4) No negative input was received from the public regarding the proposed DBE goal.
- 5) Consultation with stakeholders (e.g. minority contracting groups) provided favorable feedback on the proposed goal.

Table 7
NCTCOG Transportation Department DBE Accomplishments
for DOT- Assisted Contracts

Table 7 includes a summary of NCTCOG’s historical contract awards, DBE goals and expenditures. Information included is representative of all funding sources. Subrecipient data is included in the information presented in Table 7 for FY 2023-2025.

Fiscal Year [^]	Total Contract Amount	DBE Goal	DBE Contract %	DBE Expenditure %
2006-2010	\$17,028,000	13%	22.0%	24.10%
2011-2013	\$7,122,596	25%	27.4%	24.50%
2014-2016	\$20,010,463	25%	27.93%	24.63%
2017-2019*	\$10,657,099	25%	31.59%	33.69%
2020-2022*	\$41,807,606	19.4%	19.18%	14.78%
TOTAL	\$96,625,764	21.09%**	24.78%**	23.05%**

*through April 8, 2022

**Weighted based on total contract amounts

[^]2006-2019 NCTCOG activity only; 2020-2022 NCTCOG & Subrecipient activity

Breakout of Estimated Race Neutral (RN) and Race Conscious (RC) Participation

NCTCOG will meet the maximum feasible portion of its overall goal by using RN means of facilitating DBE participation.

1. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitates DBE and other small business participation.
2. Carrying out information and communications programs on contracting procedures and specific contract opportunities.
3. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors.

NCTCOG estimates that in meeting its overall goal of 17.0%, 12.0% will be achieved through race neutral means and 5.0% through race conscious means. This estimation is based on data presented in Table 8 below.

Table 8

**NCTCOG Transportation Department Summary of
Race Conscious (RC) and Race Neutral (RN) Expenditures**

Fiscal Year	Total Contract Expenditures	Total DBE Expenditures	DBE Expenditures through Race Conscious Means (\$)	DBE Expenditures through Race Conscious Means (%)	DBE Expenditures through Race Neutral Means (\$)	DBE Expenditures through Race Neutral Means (%)	Ratio of Race Conscious v. Race Neutral
2017-2019	\$21,046,380	\$3,154,247	\$1,932,731	9.18%	\$1,221,516	5.80%	61%:39%
2020-2022*	\$13,037,770	\$1,926,929	\$1,520,809	11.66%	\$406,119	3.11%	79%:21%

* through April 8, 2022

Total expenditures for FY 2020 – FY 2022 (Table 8) have been calculated through April 8, 2022. These expenditures correlate to the contract awards of approximately \$41.81 million identified in Table 7. Many of the contracts awarded during FY 2020 -FY 2022 are still ongoing and actively incurring additional expenditures. With approximately 5 months remaining in FY 2022, NCTCOG anticipates increases in total contract expenditures, total DBE expenditures, and DBE expenditures achieved through RC and RN means.

NCTCOG will track actual DBE participation by RN and RC and report participation separately. For reporting purposes, RN DBE participation includes, but is not necessarily limited to, the following:

1. DBE participation through a prime contract obtained through customary competitive procurement procedures.
2. DBE participation through a subcontract on a prime contract that does not carry a DBE goal.
3. DBE participation on a prime contract exceeding a contract goal and DBE participation through a subcontract from a prime contractor that did not consider a firm’s DBE status in making the award.

CONTRACT GOALS

NCTCOG will use contract goals to meet any portion of the overall goal that is not projected to be met using race neutral means. Contract goals are established so that, over the period to which the overall goal applies, they will cumulatively result in meeting any portion of the overall goal that is not projected to be met through race neutral means.

NCTCOG will establish contract goals only on those U.S. DOT-assisted contracts that have subcontracting possibilities. Pursuant to 49 CFR Part 26, contract goals are not required to be established for every contract, and the size of the contract goals will be adapted to the circumstances of each such contract. NCTCOG will express its contract goals as a percentage of the total amount of the potential award.

REVIEW FOR OVERCONCENTRATION

As part of the three-year goal update, NCTCOG has committed to review and evaluate our Program to ensure non-DBE firms, seeking the same type of work, have not been unduly burdened. Based on the Market Area availability analysis detailed in Tables 5 and 6, NCTCOG has not currently identified the existence of overconcentration in the types of work that DBEs perform.

A contractor, however, may challenge that there is an area of work in which there is overconcentration of DBE firms, and that such concentration creates an undue burden for non-DBE firms in obtaining work in this area.

REVIEW FOR DEVELOPMENT/IMPLEMENTATION OF A MENTOR-PROTÉGÉ PROGRAM

As part of the three-year goal update, NCTCOG has committed to re-evaluate the need to develop and implement a mentor-protégé program. Based on NCTCOG's historical DBE participation, implementation of a mentor-protégé program for FY 2023 – FY 2025 is not needed at this time.

PUBLIC PARTICIPATION/CONSULTATION

As part of establishing the overall DBE goal, NCTCOG hosted a consultation workshop with stakeholders prior to publishing an established goal, to help facilitate meaningful participation with the DBE community. Copies of the announcements and presentations are included in Attachment 2.1. Included in the consultation process was an overview on the development of the proposed goal, an active discussion on the goal setting process, dialogue on the process of determining contract goals and ensuring contract goals were met, and how NCTCOG could improve efforts within the DBE community. NCTCOG welcomed continued engagement and consultation.

Additionally, NCTCOG provided the opportunity for public participation through public meetings on June 13, 2022. NCTCOG directly notified individuals and organizations of the June public meetings.

The announcement of the Proposed DBE Goal for FY 2023 – FY 2025 was issued on May 13, 2022 and notice of public meeting on July 5, 2022 in the following publications: Dallas Morning News, Al Dia (Hispanic focused), La Vida News – The Black Voice, Tre (a weekly Vietnamese publication), Star Local, and La Estrella (Spanish). More than 14,500 notices were sent by mail or email. Copies of the announcements and public meeting presentations are included in Attachment 2.2.

An article was published in **Local Motion**, a monthly update on activities of the Regional Transportation Council and NCTCOG Transportation Department, which featured upcoming meetings seeking comments on DBE goals. Both **Local Motion** and the public meetings were highlighted several times on the NCTCOG Transportation Facebook account which has over 2,600 followers and on NCTCOG Transportation's Twitter account which has over 2,000 followers. In addition, NCTCOG Transportation Department issued a general press release which also featured the opportunity to discuss the draft DBE goal updates at upcoming public meetings. The press release was sent to more than 210 reporters in the Dallas-Fort Worth area, including media sources focused on reaching the Spanish, Vietnamese, Asian and African American communities. Finally, county clerks, city secretaries and libraries across the region received copies of the June and July public meeting flier to make available to citizens at their locations.

NCTCOG hosted a DBE Networking open house on June 6, 2022. To help publicize the event NCTCOG developed an open house flyer and Event Bright page. E-mail blasts and targeted emails were sent with information about the event. Flyers were e-mailed to chambers of commerce, minority chambers, contracting associations, and other professional organizations and societies whose membership base were in industries and professions of anticipated contracting opportunities. Additionally, the North Central

Texas Regional Certification Agency and Regional Hispanic Contractor’s Association helped to publicize the event through their membership. Information about the DBE Networking Open House was posted on NCTCOG’s website at: <https://www.nctcog.org/dbe> as well as NCTCOG’s social media accounts (e.g. Facebook, Twitter, and LinkedIn).

Topics at the DBE open house included an overview of the revised DBE Program goals for FY2023-2025, including NCTCOG’s policy to award a fair share and efforts to ensure a level playing field among DBE’s and non-DBE’s, as well as an overview of several upcoming contracting opportunities and the types of consultant expertise needed for those projects. Additionally, there was an opportunity for questions and answers and general discussion at the end of the DBE Networking Open House and a time for DBE and non-DBE firms to network and discuss upcoming NCTCOG contracting opportunities. Copies of the announcements and information presented at the DBE Open House are included in Attachment 2.3.

Below is a schedule of the various outreach events, presentations to NCTCOG committees, and public participation opportunities provided during our DBE goal update:

Outreach Effort or Presentation	DATE
Surface Transportation Technical Committee Meeting Briefing	March 25, 2022
Announcement of Consultation Workshop	March 28, 2022
Consultation Meeting with Stakeholders	April 11, 2022
Regional Transportation Committee Meeting Briefing	April 14, 2022
Surface Transportation Technical Committee Meeting Item on Proposed Goal	April 22, 2022
Regional Transportation Committee Information Item on Proposed Goal	May 12, 2022
Notice to Public of Proposed Goal (start 45-Day Public Comment Period)	May 13, 2022
DBE Networking Open House	June 6, 2022
Public Meeting: DBE Goal Update	June 13, 2022
Surface Transportation Technical Committee Meeting: Approval of DBE Goal (Recommend Approval of the FY2023-2025 DBE Goal Update)	June 24, 2022
End of 45-day Public Comment Period	July 12, 2022
Regional Transportation Committee Meeting: Approval of DBE Goal (Approval of the FY2023-2025 DBE Goal Update)	July 14, 2022
Executive Board: Action Item (Approval of the Fiscal Year 2023-2025 DBE Goal Update)	July 28, 2022