

Council on Aging of St. Lucie, Inc.

Disadvantaged Business Enterprise (DBE) Goal for FY 2020 – FY 2022

Introduction

Council on Aging of St. Lucie, Inc. is the contracted provider for St. Lucie County Board of County Commissioners, a designated recipient of FTA 49 USC, Ch. 5307 mass transit funds. As such, the agency is required to establish a Disadvantaged Business Enterprise (DBE) goal regarding these funds. The goals are designed to ensure nondiscrimination in the award and administration of DOT-assisted contracts in FTA's transit programs and to create a level playing field on which DBEs can compete fairly for DOT-assisted contracts. The goal applies to federal financial assistance expended on DOT-assisted contracts utilizing Section 5307 funds, exclusive of funds to be used for the purchase of transit vehicles, personnel, and rent.

Goal

In setting the goal for the Council on Aging, it is required that the goal setting process begin with a base figure for the relative availability of DBEs. The 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 DOT-assisted contracts. The goal reflects the DBE participation expected absent the effect of discrimination.

The agency has established an overall DBE goal of 2.9% of the federal financial assistance expended on DOT-assisted contracts derived from the Section 5307 funds for the period of October 1, 2019 through September 30, 2021. During Fiscal Years 2020, 2021, and 2022 the competitively-bid projects involving the DBE program, will be primarily for operating activities such as vehicle and building maintenance, janitorial services, and office related expenses.

Therefore, the agency has set a goal of 2.9% of the total contractual amount, with DBEs during each fiscal year. This goal was established in accordance with the two-step process outlined below.

Methodology

Step One – Base Figure

Under this step, utilizing the Florida Unified Certification Program (UCP) Disadvantaged Business Enterprise (DBE) Directory and the North American Industry Classification System (NAICS) codes, the agency established a base goal by dividing the total number of DBE firms (64) in the local market area into the total available firms in the same area (619) for appropriate calculation of the forecasted projects (see analysis chart).

For the purposes of calculating the DBE goal, the market area is defined as the local Port St. Lucie Metropolitan Statistical Area (MSA) comprised of St. Lucie, Indian River, and Martin County. This effort resulted in a base goal of 10.3%:

$$64 \text{ DBE Firms} / 619 \text{ Total Firms} = 10.3\%$$

NAICS Codes used for DBE Analysis:

Retail Trade

441320 - Tire Dealers - DBE Firms (1), All Firms (42)

Transportation and Warehousing

488410- Motor Vehicle Towing – DBE Firms (0), All Firms (11)

Publishing Industries

511110 Newspaper Publishers - DBE Firms (0), All Firms (13)

Administrative, Support, Waste Management, and Remediation Services

561710 – Exterminating/Pest Control Services – DBE Firms (3), All Firms (91)

561730 - Landscaping Services – DBE Firms (57), All Firms (426)

Maintenance

811192 – Car Washes – DBE Firms (3), All Firms (36)

Adjustments

Step Two – Adjustment

Under this step, the agency examined all available evidence as specified in 49 CFR Part 26.45(d)(1-2) to determine whether the base goal derived in Step One needs to be adjusted. The agency's analysis of all available evidence is as follows:

- The current capacity of DBEs to perform work in the agency's DOT-assisted contracting program as measured by the volume of work DBEs have performed in recent years.
- The two neighboring counties included in the local market area have proposed similar DBE goals where Indian River County established a 2.2% goal and Martin County established a 1.0% goal.
- Historically, the agency has had difficulty in meeting the established DBE goals due to the small percentage of DBE participation in the local market area for the basic type of activities available.
- In order to perform this analysis, it is important to define the DBE-eligible portion of the agency's DOT-assisted contracting program.
- DOT-assisted contracts for the use of federal funds are subject to the DBE program, excluding the purchase of transit vehicles, personnel, and rent.

Therefore, only a limited amount of the agency's DOT-assisted contracting program has and will continue to involve the DBE program.

During Fiscal Years 2020, 2021, and 2022, the planned and FTA-funded projects include basic vehicle and building maintenance, janitorial services, and office related services. To date, the agency has encountered difficulty in retaining DBE firms for these basic types of activities and, given the small percentage of established DBE firms that are able to undertake these types of available activities, the agency expects difficulty meeting the goal derived from this methodology alone.

Past Participation

Step Three – Adjustment

Historically, the agency has experienced an average of 3.63% over the past three years; however this calculation also included construction activities. The agency anticipates difficulty in obtaining DBE firms during the forecasted fiscal years given the activities available and the associated current available DBE firms. While the agency has put forth good faith effort to promote participation, the type of activities available during this time frame permits a small percentage of overall participation.

3 Year DBE Past Participation

2016	4.10%
	3.80%
2017	2.60%
	3.30%
2018	4.00%
	4.00%
Average	3.63%

Goal

Thus, the agency is establishing the weighted base figure of a 2.9% goal; more accurately reflecting a reliable and realistic goal based on the current proportion of available DBE firms for the activities and funds available.

Disparity studies - No such studies have previously been undertaken within the geographical work area.

Other factors - Other factors, such as statistical disparities past discrimination, and other issues are not applicable and have not been encountered by the agency to date in implementing its DBE program.

In examining all available evidence required under this step, the agency has determined that the adjustment is necessary to accurately reflect the proportion of existing or proposed DOT-assisted contracts to the small percentage of participating DBE firms available for the specific activities available during the proposed fiscal years. Also, the historical performance justifies a more accurate reflection of the market area for the available DBE firms and the volume of DOT assisted contracts available. The agency will continue to evaluate the capacity of local DBEs to perform work on DOT-assisted contracts and other available evidence in monitoring its overall goal each year.

Race Neutral Measures

As in the past, the goal will be met through race-neutral means. The DBE Liaison Officer will monitor closely participation in order to determine whether mid-course corrections are needed. In accordance with 49 CFR 26.45, Council on Aging of St. Lucie, Inc. anticipates meeting its entire 2.9% DBE participation goal through race-neutral means (see chart).

Measures to be taken may include:

- Arranging consultations, solicitations, times for the presentation of bids, quantities, specification, and delivery schedule in the way that facilitate DBE and other small and minority owned business participation;
- Encouraging DBE participation, the agency in conjunction with the St. Lucie County, the Economic Development Council, and Indian River State College will conduct community workshops.
- Evaluating participation methods, measures, and approaches.
- Providing technical assistance and other services with special emphasis on marketing; and providing the name, phone number and e-mail address for additional information pertaining to a contract.
- Unbundling solicitations; provide pre-bid/pre-proposal conferences to afford networking opportunities for primes and subcontractors. Promoting and encourage teaming opportunities between prospective prime contractors and the DBE and small business contracting community.
- Structuring solicitations to remove barriers such as the inability to obtain bonding or financing (e.g., by such means as simplifying the bonding process, reducing bonding requirements, eliminating the impact of surety costs from bids, and providing services to help DBEs, and other small businesses, obtain bonding and financing).

Public Notice

The proposed DBE goals are published in the St. Lucie News Tribune, LaVoz Newspapers, and posted on the Community Transit website located at www.TreasureCoastConnector.com.

Name of Grantee: Council on Aging of St. Lucie, Inc.

Grantee ID#: 1024

Contact Information: **Council on Aging of St. Lucie, Inc.**

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DBE Analysis Chart		
Description	NAICS	Number of Firms
St. Lucie County		
Tire Dealers	441320	19
Motor Vehicle Towing	488410	6
Newspaper Publishers	511110	6
Exterminator/Pest	561710	40
Landscaping	561730	135
Car Washes	811192	17
		223
Indian River County		
Tire Dealers	441320	12
Motor Vehicle Towing	488410	4
Newspaper Publishers	511110	4
Exterminator/Pest	561710	21
Landscaping	561730	128
Car Washes	811192	5
		174
Martin County		
Tire Dealers	441320	11
Motor Vehicle Towing	488410	1
Newspaper Publishers	511110	3
Exterminator/Pest	561710	30
Landscaping	561730	163
Car Washes	811192	14
		222

County	Available Firms
SLC	223
IRC	174
MC	222
Total	619

DBE Firms/Firms
64/619 = 10.3

NAICS	DBE	ALL
441320	1	42
488410	0	11
511110	0	13
561710	3	91
561730	57	426
811192	3	36
Total	64	619

Weighted Base Figure

Step 1 - Determine the weight of each type of work by NAICS Code:

* Enter all the FTA-assisted projects below. Project amounts should be assigned relevant NAICS Code(s).

	NAICS Code	Project	Amount of DOT funds on project:	% of total DOT funds (weight)
1)	441320	Tire Dealers	\$150,000.00	0.8813
2)	488410	Motor Vehicle Towing	\$5,000.00	0.0294
3)	511110	Newspaper Publishers	\$500.00	0.0029
4)	561710	Exterminator/Pest	\$1,500.00	0.0088
5)	561730	Landscaping	\$3,200.00	0.0188
6)	811192	Car Washes	\$10,000.00	0.0588
7)				0.0000
8)				0.0000
9)				0.0000
10)				0.0000
Total FTA-Assisted Contract Funds			\$170,200.00	1

Step 2 - Determine the relative availability of DBE's by NAICS Code:

* Use DBE Directory, census data and/or a bidders list to enter the number of available DBE firms and the number of available firms.

	NAICS Code	Project	Number of DBEs available to perform this work	Number of all firms available (including DBEs)	Relative Availability
1)	441320	Tire Dealers	1	42	0.0238
2)	488410	Motor Vehicle Towing	0	11	0.0000
3)	511110	Newspaper Publishers	0	13	0.0000
4)	561710	Exterminator/Pest	3	91	0.0330
5)	561730	Landscaping	57	426	0.1338
6)	811192	Car Washes	3	36	0.0833
7)					
8)					
9)					
10)					
Combined Totals			64	619	10.34% Overall availability of DBEs

Step 3 - (Weight) x (Availability) = Weighted Base Figure

	NAICS Code	Project	Weight	x	Availability	Weighted Base Figure
1)	441320	Tire Dealers	0.88132	x	0.02381	0.0210
2)	488410	Motor Vehicle Towing	0.02938	x	0.00000	
3)	511110	Newspaper Publishers	0.00294	x	0.00000	
4)	561710	Exterminator/Pest	0.00881	x	0.03297	0.0003
5)	561730	Landscaping	0.01880	x	0.13380	0.0025
6)	811192	Car Washes	0.05875	x	0.08333	0.0049
7)			0.00000	x	0.00000	
8)			0.00000	x	0.00000	
9)			0.00000	x	0.00000	
10)			0.00000	x	0.00000	
					Total	0.0287
					Expressed as a % (*100)	2.87%
					Rounded, Weighted Base Figure:	3%

Race Neutral/Race Conscious Analysis

Year	Total RN Dollars	Total Dollars	DBE Goal	Percent to DBEs	Relative RN Attainment	Absolute RN Attainment	Race Conscious Split
2016	20,981	508,368	4.0%	4.1%	102.5%		
	22,406	592,841	4.0%	3.8%	95.00%		
2017	21,246	808,951	4.0%	2.6%	65.00%		
	22,735	699,038	4.0%	3.3%	82.500%		
2018	33,153	822,836	4.0%	4.0%	100.0%		
	52,672	770,634	4.0%	6.8%	170.0%		
Total	173,193	4,202,668	4.0%	4.1%	102.5%	3.0	-0.1