Disadvantaged Business Enterprise Goal
FFYs 2017-2019

Prepared by
Benjamin Muller
July 2016
Proposed DBE Goals
The following are proposed participation goals for Disadvantaged Business Enterprises in federally-assisted procurements from the Naugatuck Valley Council of Governments:

<table>
<thead>
<tr>
<th>Overall DBE Goal</th>
<th>8.1%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Race-Neutral Goal</td>
<td>1.1%</td>
</tr>
<tr>
<td>Race-Conscious Goal</td>
<td>7.0%</td>
</tr>
</tbody>
</table>

Goal Methodology
The Naugatuck Valley Council of Governments (NVCOG) Disadvantaged Business Enterprise (DBE) goal is based on the Federal financial assistance we will expend in DOT assisted contracts, exclusive of Federal Transit Administration (FTA) funds to be used for the purchase of transit vehicles. The following is a summary of the method used to calculate this goal:

1. Projection of the number and type of contracts to be awarded by the Agency. The Agency’s total budget of contracting opportunities for the next three (3) years was determined. Non-contracting opportunities were eliminated from the base. These included salaries, related fringe benefits, and public utilities. The total dollars remaining became the total contracting dollar opportunities.

2. Determination of the base figure for the relative availability of DBEs. NVCOG used the Connecticut DOT (ConnDOT)’s lists of Prequalified Construction Firms (ed. January 5th, 2016) and Prequalified Consultants (Year 2016) to gain a representative sample of ready, willing, and able firms doing business relevant\(^2\) to the needs of NVCOG and within NVCOG’s likely region of procurement (identified as Fairfield, Hartford, Litchfield, and New Haven Counties). These two lists were then compared against ConnDOT’s list of certified DBEs to identify what proportion of these firms are certified with the Connecticut UCP.\(^3\)

3. Adjustments to this base figure were made by weighting the proportion of dollars likely available for consultants and contractors over the coming three year period. Because all firms on ConnDOT’s prequalified list engage in work relevant to transportation and facility construction, and because the exact nature of work performed by agency was not readily available via the prequalified lists, work was divided between contracting work and consulting work available.

4. Relevant agencies were consulted face-to-face and over the phone to determine whether any changes or adjustments might be necessary to address the needs of DBEs in our region.

5. Third party reports were reviewed to determine whether there was adequate reason to further adjust the DBE goal.

---

\(^1\) This methodology is repeated from the NVCOG DBE Program Plan (in publication).

\(^2\) “Relevant” is defined specifically in the Goal Calculation section, but indicates that the business is in an industry in which NVCOG expects to procure in the next three years.

\(^3\) NVCOG compared DBEs doing work in relevant NAICS codes from the UCP’s listings against the total number of firms available through the US Census Bureau’s County Business Patterns (CBP 2014) but found that the DBE list was not comparable to the CBP list. The CBP method provided an unadjusted DBE availability of 1.3%, which is out of line with DBE participation at comparable agencies. The final approach used overcomes the deficiency by using more comparable data.
Goal Calculation

1. Total contracting dollar opportunities: $9,464,952.00, which excludes any vehicle purchases and salaries and overhead. Grant numbers refer to FTA grants awarded to VCOG; NVCOG is presently transferring awards to the new organization, which will rename several grants.

<table>
<thead>
<tr>
<th>FTA Grant</th>
<th>Balance</th>
<th>Anticipated NAICS</th>
<th>Contracting Amt</th>
<th>Consulting Amt</th>
</tr>
</thead>
<tbody>
<tr>
<td>CT-90-X426-01</td>
<td>$3,513,567</td>
<td>236220, 237, 238, 323, 42, 51</td>
<td>$2,810,853.60</td>
<td>$702,713.40</td>
</tr>
<tr>
<td>CT-90-X466-00</td>
<td>$3,227,414</td>
<td>236220, 237, 238, 323, 42, 51</td>
<td>$2,581,931.20</td>
<td>$645,482.80</td>
</tr>
<tr>
<td>CT-39-0002-00</td>
<td>$164,881</td>
<td>323, 51, 541</td>
<td>$-</td>
<td>$164,881.00</td>
</tr>
<tr>
<td>CT-85-X014-00</td>
<td>$359,090</td>
<td>323, 51, 541</td>
<td>$-</td>
<td>$359,090.00</td>
</tr>
<tr>
<td>Anticipated Grant</td>
<td>$2,400,000</td>
<td>236220, 237, 238, 323, 42, 51</td>
<td>$2,400,000.00</td>
<td>$-</td>
</tr>
<tr>
<td>Subtotal</td>
<td>$9,664,952</td>
<td></td>
<td>$7,792,784.80</td>
<td>$1,872,167.20</td>
</tr>
<tr>
<td>Salaries, FOH</td>
<td>($200,000)</td>
<td></td>
<td>($161,258.63)</td>
<td>($38,741.37)</td>
</tr>
<tr>
<td>Total</td>
<td>$9,464,952</td>
<td></td>
<td>$7,631,526.17</td>
<td>$1,833,425.83</td>
</tr>
</tbody>
</table>

2. Base figure of relative availability (of the relevant subset of firms):

\[
\left( \frac{\text{Certified DBE firms}}{\text{Total firms}} \right) = \left( \frac{17}{180} \right) = 9.4\%
\]

3. Adjusted base figure based on weighting:

\[
\left( \frac{\text{Cert. DBE Contractors}}{\text{Total Contractors}} \right) \times \left( \frac{\text{Contracting Amt.}}{\text{Total Available}} \right) + \left( \frac{\text{Cert. DBE Consultants}}{\text{Total Consultants}} \right) \times \left( \frac{\text{Consulting Amt.}}{\text{Total Available}} \right) = \left( \frac{7}{99} \right) \times 80.63\% + \left( \frac{10}{81} \right) \times 19.37\% = 8.1\%
\]

4. The following organizations were part of a consultative process to determine the state of DBE affairs in the region and statewide:
   a. Western Connecticut SCORE
   b. Waterbury Development Corp
   c. UConn Waterbury
   d. Greater Waterbury Chamber of Commerce
   e. Greater Valley Chamber of Commerce
   f. ConnDOT Office of Contract Compliance (the UCP)

   Additionally, the following agencies were invited to discuss the needs and challenges of DBEs in our region, but did not respond to outreach:
   g. Waterbury NAACP
   h. Greater Hartford NAACP
   i. Greater Bridgeport NAACP
   j. Waterbury Hispanic Coalition
   k. Greater New England Minority Supplier Development Council
   l. Urban League of Southern Connecticut

From the initial consultative process, no cause was indicated that would encourage NVCOG to alter its weighted DBE goal of 8.1%.

5. NVCOG reviewed the United Way ALICE Reports, the DataHaven Greater New Haven Community Index, the Valley Community Foundation’s 2015 Snapshot, and the Connecticut Economic Resource Center reports for our municipalities. We have decided to keep the DBE goal of 8.1%. Our experience using the UCP’s DBE list and speaking with advocacy organizations indicates that it is likely that DBEs are under-registered in our state. To address this, we are including technical assistance registering with the state UCP in our race-neutral efforts in our broader DBE program plan.
Race-Neutral vs. Race-Conscious Participation

NVCOG’s previous goals were not met through race-neutral participation in contracts, and no opportunities for contract goals were available in the previous three (3) years of the DBE program. NVCOG projects the need for race-conscious participation to meet the proposed DBE goal.

In past experience, race-neutral means have led to a DBE participation rate of 1.1% over a three year period. While NVCOG expects that increased subcontracting opportunities arising from the commencement of a large construction project might increase the race-neutral participation, experience in the past would indicate that without contract goals achieving our DBE participation goal is unlikely. Therefore, NVCOG intends to meet 1.1% of its DBE Goal through race-neutral means, and 7.0% of its DBE Goal through race-conscious means.

Contract Goals

To fulfill the race-conscious participation projected in the previous section, contract goals must be employed. NVCOG foresees the use of contract goals on the contract(s) pertaining to the upcoming Valley Transit District headquarters and bus facilities. There are no other upcoming federally-assisted projects with subcontracting opportunities forecast for NVCOG.

Counting DBE Participation

DBE participation is based on the total amount of DOT assistance received by NVCOG in any contract awarded to an eligible DBE participant (a firm certified by Connecticut Unified Certifying Program, or UCP). The following standards will be used to determine DBE participation:

1. NVCOG and prime contractors may count only awards/expenditures to DBEs that perform a commercially useful function in the contract, as defined in the NVCOG DBE Program Plan.
2. NVCOG will count awards/expenditures for materials, supplies, or services from DBEs provided that the DBEs assume the actual and contractual responsibility for the provision of the materials, supplies, or services. The following are the allowable percentages:
   a. Sixty percent (60%) of the dollar value of the award/expenditure may be counted toward the DBE goal if the DBE supplier is not a manufacturer. One hundred percent (100%) of the dollar value of the award/expenditure may be counted toward the DBE goal if the DBE supplier is a manufacturer. Sixty percent (60%) of the dollar value of the award/expenditure may be counted toward the DBE goal if the materials or supplies are obtained from a DBE “regular dealer.”

Quotas

NVCOG does not use quotas in any way in the administration of the DBE program.
Public Participation
The following organizations were consulted in-person and/or via telephone in the development of this DBE goal:

- Waterbury Development Corporation
- Greater Waterbury Chamber of Commerce
- Greater Valley Chamber of Commerce
- UConn Waterbury
- SCORE Western Connecticut
- Connecticut Department of Administrative Services
- Connecticut DOT DBE Program

Additionally, the following organizations were contacted but did not respond to inquiries for consultation:

- Waterbury Hispanic Coalition
- Greater New Haven NAACP
- Greater Bridgeport NAACP
- Waterbury NAACP
- New England Minority Suppliers
- Urban League of Southern Connecticut

A draft version of the DBE Goal Submission was made available to the public on 6/29/16 via the NVCOG website, and was shared via social media and via legal notices in newspapers of record in Hartford, New Haven, and Bridgeport. The goal submission was also advertised in a Spanish-language newspaper with large circulation in the region. There were no comments submitted.

A public hearing was held 7/14/16 at the Naugatuck Valley Council of Governments offices, and was advertised in the public notice and via community calendars in the Lower Valley and Greater New Haven. There were no attendees of the public hearing.

Availability and Translations
The final DBE goal is available on the NVCOG’s website www.nvcogct.org. Physical copies are obtainable by writing or in person at the NVCOG office at the following address:

Naugatuck Valley Council of Governments
49 Leavenworth Street, 3rd Floor
Waterbury, CT 06702

or via phone at 203-757-0535 or email at nvcogct@nvcogct.org.

<table>
<thead>
<tr>
<th>Language</th>
<th>Translation</th>
</tr>
</thead>
<tbody>
<tr>
<td>en</td>
<td>Translations available by request.</td>
</tr>
<tr>
<td>es</td>
<td>Traducciones disponibles bajo petición.</td>
</tr>
<tr>
<td>it</td>
<td>Traduzioni disponibili su richiesta.</td>
</tr>
<tr>
<td>pl</td>
<td>Tłumaczenia dostępne na zamówienie.</td>
</tr>
<tr>
<td>pt</td>
<td>Traduções disponíveis mediante solicitação.</td>
</tr>
<tr>
<td>sq</td>
<td>Përktimore në disponicion me kërkesë.</td>
</tr>
<tr>
<td>zh</td>
<td>可根据要求提供翻译。</td>
</tr>
</tbody>
</table>
RESOLUTION
OF THE
NAUGATUCK VALLEY COUNCIL OF GOVERNMENTS
#2017-01
Disadvantaged Business Enterprise (DBE) Policy Program and Goal

I certify that the following is a true copy of the vote of the Naugatuck Valley Council of Governments on September 9, 2016 in Waterbury, Connecticut, a quorum being present.

BE IT RESOLVED that the Naugatuck Valley Council of Governments adopted a resolution to approve the NVCOG Disadvantaged Business Enterprise Program FFYs 2016-2018, and the NVCOG Disadvantaged Business Enterprise Goal FFYs 2016-2018, both documents dated July 2016.

Dated at: Waterbury, Connecticut, on September 9, 2016

Agency: Naugatuck Valley Council of Governments

Signed

Neil O'Leary, Chairman
Thu Jul 14, 2016 6:00pm – 7:00pm

DBE Public Hearing

Sponsored by: Naugatuck Valley Council of Governments

The Naugatuck Valley Council of Governments has updated its Disadvantaged Business Enterprise (DBE) Program and established a DBE goal of 8.1% for Federal Fiscal Years 2016-2018.

The public is encouraged to review and comment on the Draft Program and the proposed Goal. The draft plans are also available from 8:30 am to 4:30 pm, Monday through Friday, at the Naugatuck Valley Council of Governments offices located at 49 Leavenworth Street, 3rd Floor, Waterbury, Connecticut 06702, and at the Valley Transit District (VTD) located at 41 Main Street, Derby, Connecticut 06418.

Admission: Free

Naugatuck Valley Council of Governments
49 Leavenworth Street, 3rd Floor, Waterbury, CT 06702

Waterbury

get directions

more info »

Download File: DBE_ProgramGoal_2016-2018_FINALDRAFT.pdf (417.98KB)
Disadvantaged Business Enterprise (DBE) Program & Goal Update

June 29, 2016

The Naugatuck Valley Council of Governments has updated its Disadvantaged Business Enterprise (DBE) Program and established a DBE goal of **8.1%** for Federal Fiscal Years 2016-2018.

The public is encouraged to review and comment on the [Draft Program](http://nvcogct.org/sites/default/files/DBE_Program_2016-2018_FINALDRAFT.pdf) and the proposed [Goal](http://nvcogct.org/sites/default/files/DBE_Goal_2016-2018_FINALDRAFT.pdf). The draft plans are also available from 8:30 am to 4:30 pm, Monday through Friday, at the Naugatuck Valley Council of Governments offices located at 49 Leavenworth Street, 3rd Floor, Waterbury, Connecticut 06702, and at the Valley Transit District (VTD) located at 41 Main Street, Derby, Connecticut 06418.

[DBE Program Draft](http://nvcogct.org/sites/default/files/DBE_Program_2016-2018_FINALDRAFT.pdf)
Civil Rights Officer
Naugatuck Valley Council of Governments
49 Leavenworth Street, 3rd Floor
Waterbury
Connecticut 06702

Alternatively, you can leave comments via phone at (203) 489-0368, or via email at bmuller@nvcogct.org (mailto:bmuller@nvcogct.org).

A public hearing regarding this update will be held at the Naugatuck Valley Council of Governments offices at the above address on **July 14th at 6:00 PM**. NVCOG’s offices are ADA accessible and conveniently located near the Waterbury Green. Interpretive services are available upon request.
AFFIDAVIT OF PUBLICATION

State of Connecticut
County of Hartford

July 01, 2016

I, Janet Tarasuk, do solemnly swear that I am a Sales Assistant of the Hartford Courant, printed and published daily, in the state of Connecticut and that from my own personal knowledge and reference to the files of said publication the advertisement of Public Notices was inserted in the regular edition.

On Dates as Follows:
07/01/2016 140.74; 07/01/2016 10.00

In the Amount of:

$150.74
Naugatuck Valley Council of Governments (NVCOG) - CU00499071
4296131
Full Run

_________________________  Sales Assistant,
Janet Tarasuk

Subscribed and sworn before me on July 01, 2016

_________________________  Notary Public

RENEE N. JANES
NOTARY PUBLIC
MY COMMISSION EXPIRES MAR. 31, 2018

Order # - 4296131
Naugatuck Valley Council of Governments

DSE Program Update & Goal Establishment

The Naugatuck Valley Council of Governments (NVCOG) has prepared a Disadvantaged Business Enterprise (DSE) Program and established a DSE goal of 8.3% for Federal Fiscal Years 2016-2018.

The public is encouraged to comment on the Draft Plan and Goal, available online at www.nvcog.org and www.valleypresstoday.org, and from 8:30 a.m. to 4:30 p.m., Monday through Friday, at the NVCOG offices located at 49 Leavenworth Street, 3rd Floor, Waterbury, CT 06702 and at the Valley Transit District (VTD) located at 41 Main Street, Derby, CT 06418.

There will be a public hearing Thursday, July 14th at 6:00 p.m., at 49 Leavenworth Street, 3rd Floor, Waterbury, CT 06702.

Comments should be sent to Benjamin Muller, Civil Rights Officer, NVCOG, 49 Leavenworth Street, 3rd Floor, Waterbury, CT 06702, (203) 489-0988, or via email at bmuller@nvcog.org.
## DBE Program – Public Informational Meeting
### NVCOG Conference Room

**Thursday, July 14, 2016 – 6 p.m.**

<table>
<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>