



**NAUGATUCK VALLEY
COUNCIL of GOVERNMENTS**

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Disadvantaged Business Enterprise Goal

FFYs 2020-2022

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Proposed DBE Goals

The following are proposed participation goals for Disadvantaged Business Enterprises in federally-assisted procurements from the Naugatuck Valley Council of Governments:

Overall DBE Goal	4.9%
Race-Neutral Goal	4.9%
Race-Conscious Goal	0%

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 goal¹:

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 (CT DOT)'s lists of Prequalified Construction Firms (ed. February 5th, 2019) and Prequalified Consultants (Year 2019) to gain a representative sample of ready, willing, and able firms doing business relevant² 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 CT DOT'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 CT DOT's prequalified list engage in work relevant to transportation and facility construction, and because the exact nature of work performed by each 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 2019) 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

- Total contracting dollar opportunities: \$2,927,588.00, which excludes any vehicle purchases and salaries and overhead. Grant numbers refer to FTA grants awarded to NVCOG has recently combined several grants and the new award numbers are reflected below.

FTA Grant	Balance	Anticipated NAICS	Contracting Amt	Consulting Amt
CT-2016-013	\$1,348,546	236220, 237, 238, 42, 511110, 541330, 541620, 924110	\$1,348,546	\$-
CT-2016-014	\$212,111	323, 51, 541	\$-	\$212,111
CT-2016-016	\$681,016	485991, 236220, 323, 51, 237, 238	\$681,016	\$-
CT-2018-015	\$300,000	485991, 336211, 336211, 485113	\$300,000	\$-
Anticipated Grant	\$200,000	237990, 334519, 541330	\$200,000	\$-
Anticipated Grant	\$350,000	236220, 237, 238, 42, 541330, 541620, 924110	\$280,000	\$70,000
Subtotal	\$3,091,673		\$2,809,562	\$282,111
Salaries, FOH	(164,085)		(\$149,112)	(\$14,973)
Total	\$2,927,588		\$2,660,450	\$267,138

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

$$\left(\frac{\text{Certified DBE firms}}{\text{Total firms}} \right) = \left(\frac{11}{182} \right) = 6.04\%$$

- Adjusted base figure based on weighting:

$$\left(\frac{\text{Cert. DBE Contractors}}{\text{Total Contractors}} \right) \times \left(\frac{\text{Contracting Amt.}}{\text{Total Available}} \right) + \left(\frac{\text{Cert. DBE Consultants}}{\text{Total Consultants}} \right) \times \left(\frac{\text{Consulting Amt.}}{\text{Total Available}} \right)$$

$$\left(\frac{5}{108} \right) \times 90.88\% + \left(\frac{6}{74} \right) \times 9.12\% = 4.9\%$$

- The following organizations were part of a consultative process to determine the state of DBE affairs in the region and statewide:
 - Western Connecticut SCORE
 - Waterbury Development Corp
 - Greater Waterbury Chamber of Commerce
 - CT DOT 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:

- Greater Valley Chamber of Commerce
- Waterbury Hispanic Coalition
- Greater New England Minority Supplier Development Council
- Women's Business Development Council
- 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 4.9%.

- NVCOG reviewed the United Way ALICE Reports, the DataHaven Greater New Haven Community Index, and the Connecticut Economic Resource Center reports for our municipalities. We have decided to keep the DBE goal of 4.9%. 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. The number of DBE firms in our region has declined since the last DBE Goal was published.

Race-Neutral vs. Race-Conscious Participation

NVCOG's previous DBE Goal was met through race-neutral participation in contracts. Going forward, NVCOG intends to meet its DBE Goal solely through race-neutral participation.

Race-neutral participation has comprised the majority of our DBE contracts. Over the last three years a large construction project has led to more subcontracting opportunities, however due to the completion of the Transit Headquarters NVCOG intends on maintaining the 4.9% goal set for race-neutral contracts. It is critical for NVCOG to put in place attainable contract goals given the nature of projects it might undertake. Therefore, NVCOG will not set a DBE Goal through race-conscious means. The DBE Goal was broken down in this manner because it is easier for NVCOG measure and monitor performance toward meeting its goal through race-neutral means.

Contract Goals

NVCOG intends on fulfilling its DBE Goals through race-neutral participation. NVCOG has applied their race-neutral goals on the contract(s) pertaining to the Valley Transit District headquarters (and bus facilities) and the Route 8 Alt. Modes Analysis. NVCOG foresees utilizing these goals on future projects including the Valley Transit Bus Shelters.

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
- SCORE Western Connecticut
- Connecticut DOT DBE Program

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

- Waterbury Hispanic Coalition
- Greater Valley Chamber of Commerce
- Women's Business Development Council
- New England Minority Suppliers
- Urban League of Southern Connecticut

A draft version of the DBE Goal Submission was made available to the public on 7/11/19 via the NVCOG website, and was shared via social media and via legal notices in newspapers of record in Hartford, New Haven, and Bridgeport. There were no comments submitted.

A public hearing was held 7/23/19 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 at the public hearing.

Availability and Translations

The final DBE goal is available on the NVCOG's website: www.nvcogct.gov. 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.

en	Translations available by request.
es	Traducciones disponibles bajo petición.
it	Traduzioni disponibili su richiesta.
pl	Tłumaczenia dostępne na zamówienie.
pt	Traduções disponíveis mediante solicitação.
sq	Përkthime në dispozicion me kërkesë.
zh	可根据要求提供翻译。