



**NAUGATUCK VALLEY
COUNCIL of GOVERNMENTS**

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Disadvantaged Business Enterprise Goal

FFYs 2022-2025

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Proposed DBE Goals

The Naugatuck Valley Council of Governments overall goal for the following time period 2022-2025 is 4.06% of the Federal financial assistance we will expend in DOT-assisted contracts funded directly by the Federal Transit Administration (FTA).

Overall DBE Goal	4.06%
Race-Neutral Goal	2.03%
Race-Conscious Goal	2.03%

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 specific NAICS codes and descriptions 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. The data source used to derive the relative availability of DBEs in NVCOG's market area was the Connecticut Unified Certification Program (UCP) DBE Directory.³ In order to determine the appropriate market area, we reviewed our past participation for the past three years. Most subcontracting opportunities and dollars, both for firms in general and for the DBE community, are being utilized by firms in Connecticut and more specifically firms within the Hartford and New Haven Counties.
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.
4. Relevant agencies were consulted face-to-face, and via email to determine whether any changes or adjustments might be necessary to address the needs of DBEs in our region.
5. Further evidence was 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 2020)

Goal Calculation

1. Total contracting dollar opportunities: \$1,299,123.30, which excludes any vehicle purchases and salaries and overhead. Grant numbers refer to FTA grants awarded to NVCOG and are reflected in Table 1 below.

Table 1: Total Contracting Dollar Opportunities

Available Funds	2016-013	2016-016	2018-015	Total Federal \$	%
Bus Support EQ	-	55,478.00	-	55,478.00	4.3%
Shop EQ	99,360.22	-	160,000.00	259,360.22	20.0%
Total Equipment	99,360.22	55,478.00	160,000.00	314,838.22	24.2%
Bus Shelters: Design	-	-	-	-	0.0%
Total Consultant	-	-	-	-	0.0%
Bus Shelters: Construction	105,413.00	-	-	105,413.00	8.1%
Facility	502,692.08	376,180.00	-	878,872.08	67.7%
Total Construction / Reno	608,105.08	376,180.00	-	984,285.08	75.8%
Total Federal Dollars	707,465.30	431,658.00	160,000.00	1,299,123.30	100.0%

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

Table 2: Number of All Firms - Census Bureau County Business Patterns Database - By NAICS Code

Description	Code	Hartford	New Haven	Total
Commercial and institutional building construction	236220	83	73	156
Poured concrete foundation and structure contractors	238110	42	40	82
Electrical contractors and other wiring installation contractors	238210	242	273	515
Plumbing, heating, and air-conditioning contractors	238220	290	304	594
Other building equipment contractors	238290	35	24	59
Painting and wall covering contractors	238320	95	101	196
Site preparation contractors	238910	103	91	194
All other specialty trade contractors	238990	76	93	169
Automotive parts and accessories stores	441310	90	72	162
Engineering services	541330	155	106	261
Environmental consulting services	541620	27	23	50

Table 3: Number of DBE Firms – CT Unified Certification Program DBE Directory

Description	Code	Total
Commercial and institutional building construction	236220	3
Poured concrete foundation and structure contractors	238110	18
Electrical contractors and other wiring installation contractors	238210	9
Plumbing, heating, and air-conditioning contractors	238220	6
Other building equipment contractors	238290	0
Painting and wall covering contractors	238320	30
Site preparation contractors	238910	23
All other specialty trade contractors	238990	25
Automotive parts and accessories stores	441310	0
Engineering services	541330	27
Environmental consulting services	541620	12

Based upon the above total number for all firms and DBE firms, the unweighted relative DBE availability is calculated as follows:

$$\left(\frac{\text{Certified DBE firms}}{\text{Total firms}} \right) = \left(\frac{153}{2438} \right) = 6.3\%$$

3. Adjusted base figure based on weighting: Weighting can help ensure that the Base Figure is as accurate as possible. To establish the “Weighted Base Goal”, the availability of DBEs in each NAICS code is computed and used to determine DBE contractible dollars. The total DBE contractible dollars are then divided by the total projected contracting dollars to determine the weighted base DBE goal, expressed as a percentage:

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

$$\left(\frac{114}{2127} \right) \times \left(\frac{984,285.08}{1,299,123.30} \right) + \left(\frac{39}{311} \right) \times \left(\frac{0}{31,129,123.301} \right) = 4.06\%$$

4. The following organizations were invited to take part in a consultative process to determine the state of DBE affairs in the region and statewide:
 - a. Western Connecticut SCORE
 - b. Waterbury Development Corp
 - c. Greater Waterbury Chamber of Commerce
 - d. CT DOT Office of Contract Compliance (the UCP)
 - e. Greater Valley Chamber of Commerce
 - f. Waterbury Hispanic Coalition
 - g. Greater New England Minority Supplier Development Council
 - h. Women’s Business Development Council
 - i. Urban League of Southern Connecticut

5. After calculating a base figure of the relative availability of DBEs, evidence was examined to determine what adjustment was needed to the base figure to arrive at the overall goal. NVCOG considered two primary factors as part of step two: past participation and evidence from other disparity studies in our market area.
 - a. USDOT's Tips for Goal setting notes that if using past participation, the median level of participation should be considered. Because contracting opportunities projected are similar in nature to those in the past, COG does believe an adjustment should be made for this factor. Because NVCOG did not have sufficient contract activity to establish a DBE goal for the period of 2019-2021, insufficient data exists to adjust the base figure based on past participation.

Fiscal Year	DBE Achievement
2019	15.44%
2020	0.52%
2021	0%

- b. There were no readily available disparity studies other than the 2013 [Connecticut Disparity Study](#). NVCOG reviewed the Data Haven Greater New Haven Community Index, and the Connecticut Economic Resource Center reports for our municipalities. We have decided to keep the DBE goal of 4.06%.

Race-Neutral vs. Race-Conscious Participation

NVCOG's previous DBE Goal was met through race-neutral participation in contracts. On the other hand, NVCOG has not met its goal for race-conscious participation. Going forward, NVCOG intends to meet its DBE Goal through both race-neutral and race-conscious participation.

In the past, the majority of our contracts included race-neutral participation. A large construction project previously led to more subcontracting opportunities; however, the Transit Headquarters project has been completed and the Alt. Modes study is nearing completion. Future spending is anticipated to be directed toward the Valley Transit District Bus Shelter Replacement Project and purchasing supplies and equipment. There may be limited contracts with subcontracting opportunities, therefore it is critical for NVCOG to put in place attainable contract goals given the nature of projects it might undertake. For this reason, NVCOG intends to establish a 2.03% goal for race neutral participation and a 2.03% goal for race conscious participation.

Contract Goals

NVCOG intends on fulfilling its DBE Goals through a combination of Race conscious and race-neutral participation. NVCOG has applied its 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 invited to consult in-person, via zoom, and/or via telephone on the development of this DBE goal:

- Waterbury Development Corporation
- Greater Waterbury Chamber of Commerce
- SCORE Western Connecticut
- Connecticut DOT DBE Program
- 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 was made available to the public on 8/2/22 via the NVCOG website and was shared via social media.

A public hearing was held on 8/23/22 at the Naugatuck Valley Council of Governments offices. There were no attendees at the public meeting. A recording was made available on the NVCOG YouTube channel for on demand viewing.

NVCOG received one comment from the Connecticut Department of Transportation regarding the current goal setting methodology. The methodology has been updated to reflect the feedback received.

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。