

Overall DBE Three-Year Goal Methodology

Iowa Department of Transportation – FAA Goal for Airport Construction/Professional Services

Name of Recipient: Iowa Department of Transportation Aviation Bureau

Goal Period: FY 2022-24 (10/1/2021 through 9/30/2024)

DOT-assisted contract amounts:

Year 1	\$150,000
Year 2	\$150,000
Year 3	\$150,000
Totals	\$450,000

Overall Three-Year Goal: 4.1%, to be accomplished through 1.4% Race Conscious and 2.7% Race Neutral

Total dollar amount to be expended on DBEs: \$8,161

Describe the Number and Type of Contracts that the airport anticipates awarding:

Contracts in Fiscal Year #1

1. Pavement Inspection - \$150,000

Contracts in Fiscal Year #2

1. Pavement Inspection - \$150,000

Contracts in Fiscal Year #3

1. Pavement Inspection - \$150,000

Market Area

The market area for engineering/consultant/master planning and pavement management services is open to any firm nationwide that meets the qualification criteria for doing work with the Iowa DOT. The area in which the substantial majority of the contractors and subcontractors that seek to do business with the Aviation Bureau and historically where the majority of contracting dollars were spent was determined to be the State of Iowa.

Step 1. Actual relative availability of DBEs

The base figure for the relative availability was calculated as follows:

Method: Use DBE Directories (faa.dbesystem.com) and Census Bureau Data (<https://data.census.gov/cedsci/>).

Weighted Availability of DBE firms:

Fiscal Year #1

For 10/1/2021 - 9/30/2022, award of the following is anticipated:

Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	Census Directory	DBE (%)	DBE (\$) (= Trade \$ x DBE %)
Pavement Inspection	Pavement Inspection	Engineering	541330	\$150,000	7	386	1.8% \$2,720
Pavement Inspection				\$150,000			1.8% \$2,720
Year 1 Total				\$150,000			1.8% \$2,720

Fiscal Year #2

For 10/1/2022 - 9/30/2023, award of the following is anticipated:

Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	Census Directory	DBE (%)	DBE (\$) (= Trade \$ x DBE %)
Pavement Inspection	Pavement Inspection	Engineering	541330	\$150,000	7	386	1.8% \$2,720
Pavement Inspection				\$150,000			1.8% \$2,720
Year 2 Total				\$150,000			1.8% \$2,720

Fiscal Year #3

For 10/1/2023 - 9/30/2024, award of the following is anticipated:

Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	Census Directory	DBE (%)	DBE (\$) (= Trade \$ x DBE %)
Pavement Inspection	Pavement Inspection	Engineering	541330	\$150,000	7	386	1.8% \$2,720
Pavement Inspection				\$150,000			1.8% \$2,720
Year 3 Total				\$150,000			1.8% \$2,720

The base goal projection after weighting is as follows:

- Total Weighted DBE Availability: **\$8,161**
- Total for All Trades: **\$450,000**

Dividing the weighted DBE totals by the total estimate for all trades gives a base DBE availability figure for the projects anticipated during the goal-setting period. This figure is expressed as a percentage and serves as the basis for the three-year overall goal.

Base of DBE Goal: **1.8%**

Past History Participation

One piece of data used to determine the adjustment to the base figure was the median of historical DBE accomplishments, as follows:

FY	Total Grant \$ Amount	Goal	Participation	Type of Work
		FY 19	\$731,244	3.5%
FY 18	\$277,164	5.6%	8.2%	Planning and Engineering
FY 17	\$311,788	5.6%	5.4%	Planning and Engineering

Arranging this historical data from low to high (5.41%, 6.38%, 8.22%), the median is **6.4%**.

Step 1 Base averaged with historical median: **$(1.8\% + 6.4\%) / 2 = 4.1\%$**

To arrive at an overall goal, the Step 1 base figure was added to the Step 2 adjustment figure and the total was averaged, arriving at an overall goal of **4.1%**. State of Iowa believes this adjusted goal accurately reflects DBE participation that can be achieved for the type(s) of work being awarded during this three-year goal period (FY 2022-24).

Furthermore, there are no applicable disparity studies for the local market area or recent legal case information from the relevant jurisdictions to show evidence of barriers to entry or competitiveness of DBEs in the market area that is sufficient to warrant making an adjustment to the base goal.

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

State of Iowa will meet the maximum feasible portion of the overall goal by using race neutral 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 businesses, participation;
2. Providing assistance in overcoming limitations such as inability to obtain bonding or financing;
3. Providing technical assistance and other services;
4. Carrying out information and communications programs on contracting procedures and specific contract opportunities;
5. Implementing a supportive services program to develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for DBEs and other small businesses;
6. Providing services to help DBEs and other small businesses improve long-term development, increase opportunities to participate in a variety of kinds of work, handle increasingly significant projects, and achieve eventual self-sufficiency;

7. Establishing a program to assist new, start-up firms, particularly in fields in which DBE participation has historically been low;
8. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors;
9. Assist DBEs and other small businesses, to develop their capability to utilize emerging technology and conduct business through electronic media.

State of Iowa estimates that in meeting the established overall goal of 4.1%, it will obtain 2.7% from RN participation and 1.4% through race conscious measures.

Fiscal Year	Participation	Goal	Difference
FY 2017	5.41	5.58	-0.17
FY 2018	8.22	5.58	2.64
FY 2019	6.38	3.54	2.84
FY 2020	8.62	3.54	5.08

Of the 4.1% goal, 2.74 will be obtained from RN measures and 1.36 from RC measures.

This was calculated by analyzing the data from the difference between the overall DBE goal and the actual DBE participation. We arranged the results and obtained the median value of .2.7%. Subtracting the 2.7% from our 4.1% goal gives us a projection of 2.7% from Race Neutral and 1.4% through Race Conscious measures.

In 2017-2020, State of Iowa accomplishments exceeded the goal by a median of 2.7%%, which may be construed as evidence of race-neutral participation. Therefore, 2.7% of the 4.1% goal is expected through race-neutral means and the remaining 1.4% is to be obtained by race-conscious measures.

State of Iowa will adjust the estimated breakout of race neutral and race conscious DBE participation as needed to reflect actual DBE participation (see §26.51(f)) and track and report race neutral and race conscious participation separately. For reporting purposes, RN DBE participation includes, but is not necessarily limited to the following: DBE participation through a prime contract obtained through customary competitive procurement procedures; DBE participation through a subcontract on a prime contract that does not carry a DBE goal, 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.

Consultation

In establishing the overall goal, State of Iowa provided for consultation and publication. This process included consultation with minority, women's, and general contractor groups, community organizations, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the State of Iowa's efforts to establish a level playing field for the participation of DBEs. The consultation included a scheduled, direct, interactive exchange with as many interested stakeholders as possible focused on obtaining information relevant to the goal setting process and was conducted before the goal methodology was submitted to the operating administration for review. Details of the consultation are as follows.

The Iowa DOT submitted its overall 3-year goal to FAA in June 2021 prior to posting for public comment. The Iowa DOT submitted the final goal to FAA after the comment period closed.

Before establishing the overall goal, the Aviation Bureau identified methods used by the Iowa DOT to establish a level playing field for the participation of DBEs and any information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the outreach efforts used to identify potential vendors. A public teleconference was held on June 10, 2021 to provide opportunity to discuss these issues. No comments were received.

A notice of the proposed goal was published on the State of Iowa official website before the methodology was submitted to Federal Aviation Administration.

Following the consultation, a notice was published on the Iowa DOT website regarding the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection for 30 days following the date of the notice, and informing the public that the State of Iowa will accept comments on the goals for 30 days from the date of the notice.

If the proposed goal changes following review by Federal Aviation Administration, the revised goal will be posted on State of Iowa official website.

Notwithstanding paragraph (f)(4) of §26.45, State of Iowa proposed goals will not be implemented until this requirement has been met.

Contract Goals

The recipient will use contract goals to meet any portion of the overall goal that the recipient does not project being able to meet using RN 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 recipient's overall goal that is not projected to be met through the use of RN means.

The recipient will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. It need not establish a contract goal on every such contract, and the size of the contract goals will be adapted to the circumstances of each such contract (e.g., type and location of work and availability of DBEs to perform the particular type of work).

We will express our contract goals as a percentage of the federal share of a DOT-assisted contract.

Press Release

DBE GOALS FOR FEDERALLY FUNDED AVIATION PROJECTS TO BE DISCUSSED AT TWO PUBLIC MEETINGS

The Iowa Department of Transportation will be holding two input sessions to gather public comments concerning the Fiscal Year 2022-2024 Disadvantaged Business Enterprise Triennial goals for Federal Aviation Administration-funded projects for the Aviation Bureau. In establishing our three-year goal, the Iowa DOT seeking public participation on its goal-setting process and to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Iowa Department of Transportation's efforts to establish a level playing field for the participation of DBEs.

Both meetings will be held via conference call.

Thursday, June 10 from 9 – 10 a.m. – Goal methodology and setting processes

Thursday, June 24 from 9 – 10 a.m. – Proposed goal discussion

Those who wish to call into either meeting by telephone can do so at 866-685-1580 code: 9820640825. Comments will also be accepted via email. To comment, please email shane.wright@iowadot.us.

If you require special accommodations during the conference call, please notify the Iowa DOT contact listed above by June 8, 2021.

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Federal and state laws prohibit employment and/or public accommodation discrimination on the basis of age, color, creed, disability, gender identity, national origin, pregnancy, race, religion, sex, sexual orientation, or veteran's status. If you believe you have been discriminated against, please contact the Iowa Civil Rights Commission at 800-457-4416 or Iowa Department of Transportation's affirmative action officer.