

2023-25 DBE METHODOLOGY AND
GOAL FOR PENNDOT FAA
SUBRECIPIENTS

DEVELOPED BY THE
PENNSYLVANIA DEPARTMENT OF
TRANSPORTATION

August 1, 2022

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EXECUTIVE SUMMARY

The Pennsylvania Department of Transportation (PennDOT) has developed its triennial Disadvantaged Business Enterprises (DBE) goal for federal fiscal years 2023-2025 (October 1, 2022 – September 30, 2025) in accordance with Title 49 Code of Federal Regulations (Part 26), and the guidance set forth in the *Tips for Goal-Setting in the Disadvantaged Business Enterprise (DBE) Program* (TIPS). While PennDOT’s DBE Methodology and Goal are established every three years, PennDOT conducts interim reviews or mid-course “inline corrections” annually to assess market conditions and ensure that its goal remains legally defensible.

PennDOT is a recipient of U.S. Department of Transportation (USDOT) Federal Aviation Administration (FAA) funds in excess of \$250,000. As a condition of receiving financial assistance, PennDOT will comply with FAA DBE program requirements in accordance with 49 CFR 26.45(a) (1).

Goal Methodology

Step-1 Determine the Relative Availability of DBEs as a base figure. (§26.45(c))

To establish DBE relative availability, PennDOT identified all federally-assisted projects planned for the goal period. For each project, PennDOT identified:

- Relevant geographic market,
- NAICS codes associated with the work that is planned,
- Dollar value of work performed under each NAICS code,
- Number of all (DBE & non-DBE) ready, willing, and able (RWA) firms available to perform the work, and
- Number of RWA DBE firms available to perform the work.

DBE firms were identified from the Pennsylvania Unified Certification Program (PAUCP) list of DBEs. The count of all firms was taken from the U.S. Census Bureau’s County Business Patterns (CBP). The ratios of DBE firms to all firms were weighted according to the work’s dollar value to arrive at a DBE relative availability of 17.14%. (See Table 1 in the Technical Addendum.)

Step-2: Adjust the base figure. (§26.45(d))

PennDOT examined all relevant evidence within its jurisdiction to determine what, if any, adjustments up or down needed to be made to the base figure to arrive at the overall DBE goal. PennDOT averaged the median DBE participation over the previous five federal fiscal years with the base figure to arrive at its overall goal. Median DBE past participation is 6.98%. (See Table 2 in Technical Addendum for past participation calculation.)

(Step-1 Base Figure + Past Participation Figure)/2 = Step-2 Adjusted Figure

$$(17.14\% + 6.98\%)/2 = 12.06\%$$

Race-Conscious/Race-Neutral Allocation (§26.45(f)(3))

PennDOT looked to its race-neutral attainment over the previous five years to calculate its anticipated race-neutral attainment over the next three years. Median race-neutral attainment over the previous five years is 1.56%. Subtracting the median race-neutral attainment from the Step-2 adjusted figure of 12.06% yields a race-conscious ratio of 10.50%.

The Critical Public Notice and Public Comment Component of DBE Goal-Setting

During the goal-setting process, PennDOT adheres to the public participation component of the goal-setting process required by Section 26.45 (j) by consulting with minority, women's and general contractor groups, as well as community organizations and other officials or organizations, that could be expected to have information relative to the availability of both DBE and non-DBEs; the effects of discrimination on opportunities for DBEs; and efforts to establish a level playing field for the participation of DBEs in federally-assisted, transportation-related contracting.

As required by Section 26.45 (g) (2), the Department will publish a notice announcing its rationale, methodology, and goal. This document will be available for inspection during the Department's normal business hours at its central office location in Harrisburg, Pennsylvania, and will be published on PennDOT's Bureau of Equal Opportunity website at <https://www.penndot.pa.gov/about-us/EqualEmployment/Pages/default.aspx>. Any comments on the DBE Goal and Methodology can be sent to the Bureau of Equal Opportunity through its resource account at penndotdbgoal@pa.gov. The public comment period will begin June 17, 2022 and continue for thirty (30) days.

PennDOT's Bureau of Equal Opportunity will sponsor a Public Consultation Forum on June 23, 2022. The Department encourages public comments, and notes that these comments add real value to the goal-setting effort and the Department's DBE program. In the past, public comments have resulted in the collection of additional data and/or provided anecdotal information that, ultimately, was factored into the adjustment phase of goal-setting.

To the extent that additional data is reflected in public comments received during the public comment period discussed below, it will be included in a package of submissions to FAA. It has and continues to be the Department's practice to allow the FAA to review the public comments the Department receives during the thirty-day public comment period. PennDOT will submit this methodology, along with any comments and Department responses received to that point, by the August 1, 2022 due date.

Following the Public Comment Period

At the conclusion of the public comment period, PennDOT will convene a meeting of impacted DBE program personnel to discuss the public comments received. The Department's Office of Chief Counsel also participates in this endeavor. If there is a need to revise the methodology and/or recalculate the overall goal, the Department will immediately commence this process.

PennDOT forwards to the FAA, all public comments and incorporated responses along with its goal submission.

PROGRAM TERMS TAILORED TO THE LOCAL CONDITIONS OF THE COMMONWEALTH OF PENNSYLVANIA CONSISTENT WITH 49 C.F.R. PART 26.

DEPARTMENT – As used in this document, the Department refers to the Pennsylvania Department of Transportation of the Commonwealth of Pennsylvania. Also referred to as PennDOT.

DBE – A small, for-profit business that meets the size, ownership, control, and definitional requirements of 49 C.F.R. Part 26.5 and has been certified by the UCP under the federal regulation set forth in 49 C.F.R. Part 26.

READY, WILLING AND ABLE BUSINESSES/ENTERPRISES – The current universe of businesses interested, capable, and authorized to perform work on the Department’s federally-assisted, transportation-related contracts. *Ready* refers to those businesses that perform a trade, function or service that may be utilized on the Department’s federally-assisted contracts. *Willing* refers to ready businesses that have either performed or expressed a bona fide interest in performing a function on the Department’s federally-assisted contracts. *Able* refers to ready and willing businesses that have fulfilled the Department’s requirements to participate in the performance of its federally assisted contracts including becoming a Registered Business Partner. In sum, those businesses that are ready, willing, and able to perform on the Department’s federally assisted contracts are businesses that are authorized by the Department to participate in its federally-assisted contracts that have either expressed or demonstrated an interest in doing so.

READY, WILLING AND ABLE DBEs – Those businesses that meet the definition of “ready, willing and able businesses” and that have been certified by the Department or any of the other entities that certify DBEs in the Commonwealth under the Commonwealth’s approved Unified Certification Program (PA UCP) as a DBE consistent with the provisions of 49 C.F.R. Part 26. In sum, the Department’s universe of ready, willing and able DBEs within the meaning of 49 C.F.R. Part 26, consists of certified DBEs that have either expressed or demonstrated an interest in participating in federally-assisted Department contracts and have been authorized to do so.

RELATIVE AVAILABILITY OF DBEs – Consistent with 49 C.F.R. Part 26.45, “relative availability” of DBEs refers to demonstrable evidence of the availability of ready, willing and able DBEs relative to all businesses ready, willing and able to participate on the Department’s federally-assisted transportation-related contracts.

RACE-NEUTRAL MEASURES – Consistent with Section 26.5, the definitional section of the federal regulation set forth in 49 C.F.R. Part 26, the Department’s race-neutral measures are those designed to assist all small businesses as opposed to measures designed to benefit DBEs alone.

RACE-CONSCIOUS MEASURES – Consistent with the definitional section of the federal regulation set forth in 49 C.F.R. Part 26, the Department’s race conscious measures are those that are focused exclusively on DBEs. These include traditional contract goals.

**OVERALL GOAL FOR PARTICIPATION BY DBEs IN THE DEPARTMENT'S
FEDERALLY-ASSISTED CONTRACTS**

Based upon this methodology and the calculations within, the Department's FAA projects that its overall goal for the 2023 through 2025 fiscal years will be 12.06%. The Department plans to meet 10.50% of the goal through race-conscious means and 1.56% through race-neutral means. Since this goal must be narrowly tailored and funding changes and variations in the market are likely to occur during this period, the Department reserves the right to make adjustments or in-line corrections where warranted.

TECHNICAL ADDENDUM

The Department is setting its DBE participation goal using the 2-step process. The Department created a Step-1 goal by calculating the relative availability of DBE contractors to the enterprise universe (EU) within geographically defined markets relative to the work funded by Airport Block Grants

Step-2 attempts to take other data into consideration in adjusting the goal established in Step-1. The Department looked to various factors such as DBE participation, specialized contracts, and the influence of contract size on contractor participation to make these adjustments.

Step-1 Calculations (Baseline)

The Department identified 95 Airport Block Grants using federal funds planned for 2023-2025. For each of grant, the Department identified “ready, willing, and able” DBEs and the universe of contractors (EU) within the relevant NAICS codes located in the airport’s market area. The airport, federal fund amounts, NAICS codes and number of identified DBEs and EUs for each grant appear in the table below.

Table 1. Airport Block Grants Step-1 Data

(1) Airport	(2) Federal Funds	(3) NAICS Codes	(4) DBE	(5) EU	(6) NAICS Code Base Figure (Col. 4/ Col.5)	(7) NAICS Code Wt. within project	(8) Step-1 Base Fig. (Col. 7 X Col. 6)	(9) Fed. Funds Wt. (Col. 2 / Total Funds)	Weighted Step One Base Figure (Col. 9 X Col. 8)
FFY 2023 Grants									
Beaver Co.	\$195,000	541330	54	639	0.0845	1.0000	0.0845	0.0050	0.0004
Bedford Co. (1)	\$75,000	541330	13	298	0.0436	1.0000	0.0436	0.0019	0.0001
Bedford Co. (2)	\$75,000	541330	13	298	0.0436	1.0000	0.0436	0.0019	0.0001
Bradford	\$270,000	236210	3	0	0.0000	0.9000	0.0023*	0.0069	0.0000
		541330	4	177	0.0226	0.1000			
Brandywine	\$117,000	541330	119	1938	0.0614	1.0000	0.0614	0.0030	0.0002
Chester Co.	\$1,710,000	237310	71	345	0.2058	0.9000	0.1895*	0.0435	0.0083
		541330	119	2747	0.0433	0.1000			
Corry-Lawrence (1)	\$333,333	237310	31	141	0.2199	0.9000	0.2043*	0.0085	0.0017
		541330	52	811	0.0641	0.1000			

(1) Airport	(2) Federal Funds	(3) NAICS Codes	(4) DBE	(5) EU	(6) NAICS Code Base Figure (Col. 4/ Col.5)	(7) NAICS Code Wt. within project	(8) Step-1 Base Fig. (Col. 7 X Col. 6)	(9) Fed. Funds Wt. (Col. 2 / Total Funds)	Weighted Step One Base Figure (Col. 9 X Col. 8)
Corry-Lawrence (2)	\$450,000	237310	31	141	0.2199	0.9000	0.2043*	0.0115	0.0023
		541330	52	811	0.0641	0.1000			
Doylestown	\$450,000	237310	53	223	0.2377	0.9000	0.2198*	0.0015	0.0025
		541330	96	1616	0.0594	0.1000			
Ebensburg	\$38,000	541330	58	695	0.0835	1.000	0.0835	0.0010	0.0001
Greenville	\$150,000	238210	36	1131	0.0318	1.0000	0.0318	0.0038	0.0001
Grove City	\$150,000	541310	22	188	0.1170	1.0000	0.1170	0.0038	0.0004
Hazleton	\$1,620,000	237310	51	186	0.2742	0.7150	0.2199*	0.0412	0.0091
		541330	109	1301	0.0838	0.2850			
Jake Arner	\$90,000	541330	103	1563	0.0659	1.0000	0.0659	0.0023	0.0002
Jos. A. Hardy	\$1,350,000	237310	37	128	0.2891	0.9000	0.2686	0.0344	0.0092
		541330	55	654	0.0841	0.1000			
Mifflin Co (1).	\$150,000	237310	21	78	0.2692	0.9000	0.2466*	0.0038	0.0009
		541330	21	486	0.0432	0.1000			
Mifflin Co (2).	\$150,000	237310	21	78	0.2692	0.9000	0.2466*	0.0038	0.0009
		541330	21	486	0.0432	0.1000			
Mifflin Co (3).	\$300,000	237310	21	78	0.2692	0.9000	0.2466*	0.0076	0.0019
		541330	21	486	0.0432	0.1000			
New Castle	\$90,000	541330	55	680	0.0809	1.0000	0.0809	0.0023	0.0002
New Garden	\$144,000	541330	125	2056	0.0608	1.0000	0.0608	0.0037	0.0002
Northumberland	\$150,000	237310	20	97	0.2062	0.9000	0.1903*	0.0038	0.0007
		541330	27	571	0.0473	0.1000			

(1) Airport	(2) Federal Funds	(3) NAICS Codes	(4) DBE	(5) EU	(6) NAICS Code Base Figure (Col. 4/ Col.5)	(7) NAICS Code Wt. within project	(8) Step-1 Base Fig. (Col. 7 X Col. 6)	(9) Fed. Funds Wt. (Col. 2 / Total Funds)	Weighted Step One Base Figure (Col. 9 X Col. 8)
Pittsburgh-Butler	\$150,000	237310	35	147	0.2381	0.9000	0.2222*	0.0038	0.0008
		541330	55	696	0.0790	0.1000			
Pocono Mountain	\$270,000	541330	110	2185	0.0503	1.0000	0.0503	0.0069	0.0003
Port Meadville	\$250,000	541330	51	886	0.0576	0.2500	0.2269*	0.0064	0.0014
		541320	12	44	0.2727	0.2000			
		541370	18	56	0.3214	0.2000			
		541340	11	23	0.4783	0.1000			
		323111	6	257	0.0233	0.0500			
		541820	16	72	0.2222	0.0500			
		541620	26	116	0.2241	0.1500			
Pottstown	\$540,000	237310	53	233	0.2275	0.9000	0.2110*	0.0137	0.0029
		541330	101	1597	0.0632	0.1000			
Punxsutawney	\$360,000	237310	34	116	0.2931	0.9000	0.2722*	0.0092	0.0025
		541330	54	639	0.0845	0.1000			
Quakertown	\$150,000	238910	58	1163	0.0499	0.9000	0.0508*	0.0038	0.0002
		541330	129	2178	0.0592	0.1000			
Schuylkill Co.	\$900,000	237310	57	254	0.2244	0.9000	0.2081*	0.0229	0.0048
		541330	101	1646	0.0614	0.1000			
Somerset Co.	\$300,000	237110	31	78	0.3974	0.9000	0.3661*	0.0076	0.0028
		541330	55	652	0.0844	0.1000			
St. Marys	\$100,000	541330	51	591	0.0863	1.0000	0.0863	0.0025	0.0002
	\$300,000	237310	29	115	0.2522	0.9000	0.2351*	0.0076	0.0018

(1) Airport	(2) Federal Funds	(3) NAICS Codes	(4) DBE	(5) EU	(6) NAICS Code Base Figure (Col. 4/ Col.5)	(7) NAICS Code Wt. within project	(8) Step-1 Base Fig. (Col. 7 X Col. 6)	(9) Fed. Funds Wt. (Col. 2 / Total Funds)	Weighted Step One Base Figure (Col. 9 X Col. 8)
Titusville		541330	49	599	0.0818	0.1000			
Venango Co.	\$360,000	23621	8	39	0.2051	0.9000	0.1924*	0.0092	0.0018
		541330	56	718	0.0780	0.1000			
Washington Co. (1)	\$465,000	238210	35	874	0.0400	0.9000	0.0677*	0.0118	0.0008
		541330	59	799	0.0738	0.1000			
Washington Co. (2)	\$1,620,000	237310	36	169	0.2130	0.9000	0.1991*	0.0412	0.0082
		541330	59	799	0.0738	0.1000			
Wings Field	\$225,000	541330	137	2285	0.0600	1.0000	0.0600	0.0057	0.0003
FFY 2024 Grants									
Beaver Co.	\$150,000	238910	48	549	0.0874	0.9000	0.0871*	0.0038	0.0009
		541330	54	639	0.0845	0.1000			
Bedford Co.	\$337,500	238210	5	443	0.0113	0.9000	0.0145*	0.0086	0.0001
		541330	13	298	0.0436	0.1000			
Bloomsburg	\$450,000	236210	22	3	0.1364	0.9000	0.1269*	0.0115	0.0015
		541330	23	554	0.0415	0.1000			
Bradford Co.	\$135,000	541330	4	177	0.0226	1.0000	0.0226	0.0034	0.0001
Brandywine (1)	\$662,000	238210	34	2476	0.0137	0.9000	0.0185*	0.0169	0.0003
		541330	119	1938	0.0614	0.1000			
Brandywine (2)	\$180,000	238210	34	2476	0.0137	1.0000	0.0137	0.0046	0.0003
Chester Co.	\$900,000	237310	71	345	0.2058	0.7150	0.1595*	0.0229	0.0037
		541330	119	2747	0.0433	0.2850			
	\$300,000	237310	8	24	0.3333	0.9000	0.3047*	0.0076	0.0023

(1) Airport	(2) Federal Funds	(3) NAICS Codes	(4) DBE	(5) EU	(6) NAICS Code Base Figure (Col. 4/ Col.5)	(7) NAICS Code Wt. within project	(8) Step-1 Base Fig. (Col. 7 X Col. 6)	(9) Fed. Funds Wt. (Col. 2 / Total Funds)	Weighted Step One Base Figure (Col. 9 X Col. 8)
Clearfield-Lawrence		541330	7	149	0.0470	0.1000			
Ebensburg	\$414,000	238210	36	667	0.0540	0.0900	0.0569*	0.0105	0.0006
		541330	58	695	0.0835	0.1000			
Greenville	\$90,000	541330	59	1101	0.0536	1.0000	0.0536	0.0023	0.0001
Grove City	\$300,000	236210	9	42	0.2143	0.9000	0.2011*	0.0076	0.0015
		541330	55	668	0.0523	0.1000			
Indiana Co.	\$414,000	541330	56	676	0.0828	1.0000	0.0828	0.0105	0.0009
Jos. A. Hardy	\$150,000	541330	55	654	0.0841	1.0000	0.0841	0.0038	0.0003
Mifflin Co.	\$150,000	238210	9	596	0.0151	0.9000	0.0179*	0.0038	0.0001
		541330	21	486	0.0432	0.1000			
New Castle	\$710,000	237310	35	148	0.2365	0.9000	0.2209*	0.0181	0.0040
		541330	55	680	0.0809	0.1000			
New Garden (1)	\$190,000	238210	36	3654	0.0136	0.9000	0.0183*	0.0048	0.0001
		541330	125	2056	0.0608	0.1000			
New Garden (2)	\$900,000	237310	68	297	0.2290	0.9000	0.2121*	0.0229	0.0049
		541330	125	2056	0.0608	0.1000			
Northumberland	\$150,000	237310	20	97	0.2062	0.9000	0.1903*	0.0038	0.0007
		541330	27	571	0.0473	0.1000			
Penn Valley	\$300,00	238910	10	492	0.0203	0.9000	0.0228*	0.0076	0.0002
		541330	20	440	0.0455	0.1000			
Pittsburgh-Butler (1)	\$150,000	237310	35	147	0.2381	0.9000	0.2222*	0.0038	0.0008
		541330	55	696	0.0790	0.1000			

(1) Airport	(2) Federal Funds	(3) NAICS Codes	(4) DBE	(5) EU	(6) NAICS Code Base Figure (Col. 4/ Col.5)	(7) NAICS Code Wt. within project	(8) Step-1 Base Fig. (Col. 7 X Col. 6)	(9) Fed. Funds Wt. (Col. 2 / Total Funds)	Weighted Step One Base Figure (Col. 9 X Col. 8)
Pittsburgh-Butler (2)	\$90,000	541330	55	696	0.0790	1.0000	0.0790	0.0023	0.0002
Pocono Mountain	\$1,150,000	237310	48	368	0.1304	0.9000	0.1224*	0.0293	0.0036
		541330	110	2185	0.0503	0.1000			
Pottstown	\$150,000	237310	53	233	0.2275	0.9000	0.2110*	0.0038	0.0002
		541330	101	1597	0.0632	0.1000			
Punxsutawney	\$90,000	237310	34	116	0.2931	0.9000	0.2722*	0.0023	0.0002
		541330	54	639	0.0845	0.1000			
Quakertown	\$150,000	541330	129	2178	0.0592	1.0000	0.0592	0.0038	0.0002
Titusville	\$150,000	238210	29	663	0.0437	0.9000	0.0475*	0.0038	0.0002
		541330	49	599	0.0818	0.1000			
Venango Co. (1)	\$2,227,500	237310	37	149	0.2483	0.9000	0.2313*	0.0567	0.0131
		541330	56	718	0.0780	0.1000			
Venango Co. (2)	\$285,000	238210	37	765	0.0484	0.9000	0.0513*	0.0073	0.0004
Wellsboro-Johnston	\$90,000	541330	3	146	0.0205	1.0000	0.0205	0.0023	0.0000
Wings Field	\$1,170,000	237310	68	359	0.1894	0.9000	0.1765*	0.0298	0.0053
		541330	137	2285	0.0600	0.1000			
Zelienople	\$450,000	236210	8	33	0.2424	0.9000	0.2268*	0.0115	0.0026
		541330	54	630	0.0857	0.1000			
FFY 2025 Grants									
Beaver Co.	\$63,000	541330	54	639	0.0845	1.0000	0.0845	0.0016	0.0001
Bedford Co.	\$337,500	238210	5	443	0.0113	0.9000	0.0145*	0.0086	0.0001
		541330	13	298	0.0436	0.1000			

(1) Airport	(2) Federal Funds	(3) NAICS Codes	(4) DBE	(5) EU	(6) NAICS Code Base Figure (Col. 4/ Col.5)	(7) NAICS Code Wt. within project	(8) Step-1 Base Fig. (Col. 7 X Col. 6)	(9) Fed. Funds Wt. (Col. 2 / Total Funds)	Weighted Step One Base Figure (Col. 9 X Col. 8)
Bloomsburg	\$150,000	541330	23	554	0.0415	1.0000	0.0415	0.0038	0.0002
Bradford (1)	\$630,000	237310	6	48	0.1250	0.9000	0.0023*	0.0160	0.0000
		541330	4	177	0.0226	0.1000			
Bradford (2)	\$90,000	541330	4	177	0.0226	1.0000	0.0226	0.0023	0.0001
Brandywine	\$150,000	238910	56	1074	0.0521	0.9000	0.0531*	0.0038	0.0002
		541330	119	1938	0.0614	0.0933			
Clearfield-Lawrence	\$210,000	541330	7	149	0.0470	0.2500	0.3220*	0.0053	0.0017
		541320	11	21	0.5238	0.2000			
		541370	17	44	0.3864	0.2000			
		541340	14	19	0.7368	0.1000			
		323111	4	155	0.0258	0.0500			
		541820	14	36	0.3889	0.0500			
		541620	23	102	0.2355	0.1500			
Corry-Lawrence	\$90,000	541330	52	811	0.0641	1.0000	0.0641	0.0023	0.0001
Doylestown (1)	\$450,000	238210	29	1996	0.0145	0.9000	0.0190*	0.0115	0.0002
		541330	96	1616	0.0594	0.1000			
Doylestown (2)	\$90,000	541330	96	1616	0.0594	1.0000	0.0594	0.0023	0.0001
Grove City	\$150,000	541330	55	668	0.0823	1.0000	0.0823	0.0038	0.0003
Heritage	\$540,000	238210	29	2038	0.0142	0.9000	0.0167*	0.0137	0.0002
		541330	101	1597	0.0632	0.1000			
Indiana Co.	\$2,700,000	237310	38	140	0.2714	0.9000	0.2526*	0.0687	0.0174
		541330	57	689	0.0827	0.1000			

(1) Airport	(2) Federal Funds	(3) NAICS Codes	(4) DBE	(5) EU	(6) NAICS Code Base Figure (Col. 4/ Col.5)	(7) NAICS Code Wt. within project	(8) Step-1 Base Fig. (Col. 7 X Col. 6)	(9) Fed. Funds Wt. (Col. 2 / Total Funds)	Weighted Step One Base Figure (Col. 9 X Col. 8)
Jake Arner	\$450,000	238210	28	1985	0.0141	0.9000	0.0193*	0.0115	0.0002
		541330	103	1563	0.0659	0.1000			
Jos. A. Hardy	\$2,584,000	237310	37	128	0.2891	0.9000	0.2686*	0.0658	0.0177
		541330	55	654	0.0841	0.1000			
New Garden	\$157,500	541330	125	2056	0.0608	1.0000	0.0608	0.0040	0.0002
Northumberland	\$47,500	541330	27	571	0.0473	1.0000	0.0473	0.0012	0.0001
Penn Valley	\$150,000	238910	10	492	0.0203	0.9000	0.0228*	0.0038	0.0001
		541330	20	440	0.0455	0.1000			
Pittsburgh-Butler (1)	\$360,000	237310	35	147	0.2381	0.9000	0.2222*	0.0092	0.0020
		541330	55	696	0.0790	0.1000			
Pittsburgh-Butler (2)	\$45,000	541330	55	696	0.0790	1.0000	0.0790	0.0011	0.0001
Punxsutawney	\$90,000	541310	23	192	0.1198	1.0000	0.1198	0.0023	0.0003
Schuylkill Co. (1)	\$450,000	237310	57	254	0.2244	0.9000	0.2081*	0.0115	0.0024
		541330	101	1646	0.0614	0.1000			
Schuylkill Co. (2)	\$45,000	541330	101	1646	0.0614	1.0000	0.0614	0.0031	0.0002
Somerset Co.	\$300,000	237310	37	123	0.3008	0.9000	0.2792*	0.0076	0.0021
		541330	55	652	0.0844	0.1000			
Titusville	\$150,000	238210	29	663	0.0437	0.9000	0.0475*	0.0038	0.0002
		541330	49	599	0.0818	0.1000			
Washington Co.	\$300,000	238910	55	835	0.0659	0.9000	0.0667*	0.0076	0.0005
		541330	59	799	0.0738	0.1000			

(1) Airport	(2) Federal Funds	(3) NAICS Codes	(4) DBE	(5) EU	(6) NAICS Code Base Figure (Col. 4/ Col.5)	(7) NAICS Code Wt. within project	(8) Step-1 Base Fig. (Col. 7 X Col. 6)	(9) Fed. Funds Wt. (Col. 2 / Total Funds)	Weighted Step One Base Figure (Col. 9 X Col. 8)
Wellsboro- Johnston	\$450,000	237310	2	18	0.1111	0.9000	0.1021*	0.0115	0.0012
		541330	3	146	0.0205	0.1000			
Wilkes-Barre / Wyo. Valley	\$450,000	237310	42	203	0.2069	0.9000	0.1926*	0.0115	0.0022
		541330	80	1251	0.0639	0.1000			
Wm. T. Piper	\$450,000	237310	7	24	0.2917	0.9000	0.2663*	0.0115	0.0031
		541330	6	157	0.0382	0.1000			
Total	\$39,286,833							1.0000	0.1714

**Represents the sum of weighted NAICS code base figures.
Numbers in this table are rounded for display purposes.*

Step-2 Calculations (Adjustment)

PAST PARTICIPATION ADJUSTMENTS

The table below shows DBE Participation on FAA-assisted contracts over the last five years,

Table 2. Past DBE Participation on FAA-assisted projects by year.

FFY	Total Dollars	DBE Dollars	Percent
2021	\$7,006,535	\$542,757	0.0698
2020	\$3,894,952	\$208,564	0.0577
2019	\$9,661,978	\$353,088	0.0399
2018	\$20,133,621	\$1,796,569	0.1452
2017	\$735,910	\$70,117	0.0953
Median			0.0698

Numbers are rounded for display purposes.

Because the median past participation figure is significantly different than the Step-1 base figure, PennDOT is adjusting the base figure by averaging the two.

$$(17.14\% + 6.98\%)/2 = 12.06\%$$

RACE-CONSCIOUS/RACE-NEUTRAL ALLOCATION

The table below shows PENNDOT's race-conscious and race-neutral attainment on FAA-assisted contracts over the last five years.

Table 3. Race-conscious and race-neutral attainment on FAA-assisted contracts by year.

FFY	RC Attainment	RN Attainment
2021	0.0360	0.0415
2020	0.0087	0.0448
2019	0.0209	0.0156
2018	0.0737	0.0155
2017	0.0000	0.0000
Median		0.0156

Numbers are rounded for display purposes.

Based on median past race-neutral attainment, PENNDOT projects it will achieve 1.56% race-neutral attainment on FAA-assisted projects over the next three years. The remaining 10.50% will be achieved through race-conscious means.

FINAL GOAL CALCULATION

PENNDOT’s overall goal for FAA grants for FFYs 2023-25 is 12.06%, of which 10.50 % will be obtained by race-conscious means and 1.56% by race-neutral means. As required by Section 26.45 of the DBE rule, the proposed goal will be forwarded to the Federal Aviation Administration (FAA).

GOOD FAITH EFFORTS

There have been no good faith efforts proceedings on FAA-assisted projects in the last three years. Therefore, the Department will make no changes to the goal methodology based on the good faith efforts process.

DISPARITY STUDIES

BBC Research and Consulting (BBC) conducted two disparity studies in 2018. The first examined the Commonwealth’s Department of General Services (DGS) contracts. Although some overlap exists, the Department does not consider the DGS disparity study narrowly-tailored enough to use for this methodology.

BBC also conducted a disparity study of Pennsylvania Department of Transportation contracts funded with Federal Highway Administration (FHWA) funds. This also is not narrowly-tailored enough to FAA-funded projects to be of use in this methodology.

ONGOING MONITORING AND UPDATING

While the USDOT only requires the Department to submit goals every three years, PennDOT reserves the right to make corrections to individual grant goals as new data becomes available. The Department has always attempted to use the best data available when calculating goals and will continue to do so.

DATA SOURCES

1. All block grant data came from PENNDOT's Bureau of Aviation.
2. Enterprise unit information is taken from the U.S. Census Bureau's County Business Patterns for 2020. (The most recent year available.)
3. All DBE information obtained from the Pennsylvania UCP at <http://www.paucp.com>

2023-2025 FAA DBE METHODOLOGY AND GOAL PUBLIC CONSULTATION
FORUM
SUMMARY OF COMMENTS AND RESPONSES

C. Is the Enterprise Universe (EU) comprised of Pennsylvania (PA) firms with primary residence in PA?

R. The EU are firms which are located within the counties of the geographic markets. Some firms do spill over state lines. We defer to the Census Bureau of where a business is located because they develop those stats within the EU.

C. How could a contract have no DBE goal?

R. It is not required to put a DBE contract goal on every contract. For instance, if there are no DBEs who perform the work there wouldn't be a goal and there are contracts which have no subcontracting opportunity. You can always have race neutral participation.

C. I understand the DBE past participation is 6.98% but shouldn't this be looked at by county level? For example, Columbia County is more rural and there are less businesses in the area that have experience working in airports.

R. We adapt each project to the local area and DBE availability in that area.

C. Where is the location where this information will be made available?

R. The Methodology and goal documents is located at: <http://padbegoals.com/FAA-Goals> and <https://www.penndot.pa.gov/about-us/EqualEmployment/Pages/default.aspx>.

C. Is there a DBE Program Document?

R. The DBE Program Document is Publication 404 on PennDOT's website at <https://www.dot.state.pa.us/public/PubsForms/Publications/PUB%20404.pdf>.

C. Any consideration in breaking projects down further beyond the two NAICS Codes in the methodology? Construction Vendors = 60% etc.

R. As we get closer to the time the project is being let, we get into more NAICS code and that influences what the final project goal will be.

C. For calculating a three-year DBE goal for an airport, should the Airport use its three-year programmed federal funded projects in JACIP?

R. Yes, that is the source used in the methodology.

C. Are there DBE firms who specialize in developing airport goals?

R. Not that we know of. There could be opportunity for a potential market.

C. What contact should we use for questions outside of this forum?

R. For questions regarding the DBE Program, please email the Bureau of Equal Opportunity at penndotdbgoal@pa.gov.