

TANGIPAHOA PARISH DBE – Overall Goal Calculation & Breakout of Estimated Race-Neutral and Race-Conscious Participation

FTA DBE GOAL SETTING METHODOLOGY

Goal Period: FY2023-FY2025 – Nov. 1, 2023 – October 31, 2025

DBE Goal: 4.9% proposed

Total estimated dollar amount goal to be expended on DBEs: during this period: \$248,052 (more funding than the last 3 year period goal period but a smaller percentage of project funding.

Describe the Number and Type of Projects for this 3-year cycle: *The Parish will contract with a third-party operations service provider to provide public transit services for the Parish. From past procurements, this is an item for which no certified DBEs were located within the market area that were willing and able to operate a small system like Tangipahoa Parish's. So the Parish has expanded its market area to include at least one other DBE. This is a significant expenditure of FTA funds during this 3 year period, totaling about 45% of the proposed expenditures.*

The Parish also expects to have two contracts with sidewalk engineering firms, and construction contracts for those ADA accessible sidewalks along or near bus stops. Based upon information from past public bids and quotes, the Parish has found that engineers and construction firms from New Orleans and Baton Rouge, along with those based in 3 Northshore Parishes (Tangipahoa, St. Tammany, and Livingston) form the primary basis of interested willing and able to bid companies. It is expected that DBE certified companies can be included as primary entities or sub-contractors for the type of design and construction work, including transit planning consultant services that are procured for planning purposes. The estimated percentage of expenditures in this category in the next 3 years is about 47%.

The Parish also expects to procure limited marketing services (\$50,000) during this period and several bus stop benches or bus stop canopies (\$50,000). The Parish expects to market to the numerous DBEs in this category.

Market Area: *The Tangipahoa Parish market area consists of the entire State of Louisiana although the parishes of Tangipahoa, Livingston, and St. Tammany parishes, as well as including E. Baton Rouge and New Orleans, are the primary local Parishes that could provide DBE firms. Since the Parish was not able to reach its 7% DBE goal during the last 3 year analysis period, the Parish decided it needed to enlarge the market area to include more possible certified DBE firms.*

Determination of Market Area: *The State of Louisiana and all adjoining counties (or parishes) were included, as well as the largest and nearest large cities to Tangipahoa Parish, which are New Orleans and Baton Rouge. This was based upon the analysis of bidders lists and procurement during the past 7- year period and the greater attempt to market the transit program to certified DBE firms. We note on the DBE Base Goal Analysis the Parish has widened its market net to*

include a greater number of DBE firms and primarily targets those that can provide the services for the Parish's transit program.

This large market area was determined *to help Tangipahoa Parish locate DBE-certified firms, and to spend additional funding with DBE certified firms.*

Step 1. Base Goal Analysis: Actual relative availability of DBEs Ready and Willing

The Parish used DBE Directories from DOTD, as well as U.S. Census Business Patterns Data, and information provided by other nearby FTA funded agencies in arriving at a base figure as shown below. This is only for those proposed spending categories related to the Parish's 5307 transit program (Tangipahoa Parish has no FTA funded airports, trains, subways or ferries). The Parish also provided opportunities for public input and notified a list of interested parties that may want to provide input into goal setting. The Parish works closely with the regional Small Business Development Center at Southeastern University to provide technical assistance to potential DBEs to gain certification.

The budget that the Parish will be working with during this 3-year project period includes supplemental FTA CARES funds and the Parish regular 5307 allocation. The DBE and Firm numbers outlined below relate only to the Louisiana state-wide market area. It compares the "Certified" DBE firms have been vetted through the State of Louisiana Department of Transportation with the U.S. Census listed DBE firms that have self-identified as DBE, but not necessarily certified as DBE.

DBE Base Goal Analysis (2023-2025)							
Tangipahoa Parish, LA							
LADOTD Code	NAICS Code	Type of Work - Transit as Funded by Tangi Program	Total DBEs	Total of All Firms	Estimated Cost in \$Dollars by Type of Work	Percentage of Total Funding	Weighted Percentage (C/D*F)
	A	B	C	D	E	F	G
D25	485999	Urban/Rural Transportation Services	1	32	2,250,000.00	45.08%	1.41%
C14	541611	Transit Planning	15	791	60,000.00	1.20%	0.02%
C09	541330	Engineering Design	51	1104	329,000.00	6.59%	0.30%
706	237310	Construction (concrete, drainage)	112	181	2,252,000.00	45.12%	27.92%
N/A	423210	Other fabricated metal	1	37	50,000.00	1.00%	0.03%
C36	541613	Marketing	28	262	50,000.00	1.00%	0.11%
					4,991,000.00	100%	4.97%
Ready, willing, and able DBEs: 130 (Certified DBEs in market area) = 0.12% (Source: LADOTD)							
All firms ready, willing, and able = 107,464 (Source: U.S. Census)							

Since Tangipahoa Parish has only a short past history in administering DBE programs, it decided to use the State of LA DOTD listing of ready and willing DBE firms compared to the listing of all business firms located in the market area, since the State list is considered active, ready and willing.

The costs of the projects were weighted in order to provide a more realistic goal than one which would have resulted if we were merely divided the Total DBEs by the Total All Firms for the project, which would have resulted in a goal of less than 1 percent.

Step 2. Adjustment to Base Goal

During the previous three fiscal years, Tangipahoa Parish has documented its overall DBE participation as required by the FTA.

The three previous fiscal year's participation rates are as follows: _____

(____% base goal + ____ median)/2=____% new adjusted DBE goal.

Consultation – The following people or organizations were contacted for comments and to provide personal input into the goal setting:

1. Mr. Casey Lewis, DOTD, Louisiana
2. Hammond Chamber of Commerce
3. City of Hammond DBE program and their Director
4. Minority Parish Councilmen (2) and Female Councilwomen (2)
5. Personnel Director of Tangipahoa Parish
6. Regional Planning Commission, New Orleans and their DBE program
7. St. Tammany FTA transit program and their Director and DBE program
8. Southeastern LA Business Development Program in Hammond
9. State of Louisiana, DOTD DBE Program Manager
10. General public notice and input through newspaper notices and website

These discussions were not in an announced meeting, but because of a poor understanding of the local DBE programming, personal conversations were arranged and held in person or by phone with each of the persons above, most of which are either minorities or females themselves, or now work with programs that could be associated with the Tangipahoa DBE. The DBE local program was then explained, the goal setting reviewed, and the feedback, input, or questions solicited. This was also done because the public notice (attached hereto) in the newspaper did not solicit any written responses or phone calls to the Parish. The Parish also posted its DBE public input notice on its Facebook site and on its website.

The goal and methodology that was used was described to each person showing interest. They were asked for comments pertaining to the process in which the DBE goal was obtained, the goal itself, and the DBE plan being implemented. Based upon this, the interviewees asked questions to better understand the local DBE goal and program, and also provided input. Two persons with

other DBE programs thought that the Parish past DBE goal of 7% may be high to start a somewhat new program but that a 4.9% as proposed this period was realistic. Several other people only wanted more information on getting local companies certified as a DBE and did not know such an option existed. All of the interviewees believed that the DBE programming and goal setting were good, positive steps for the Parish to take.

STEP 2: Adjustments to Goal

Tangipahoa Parish would consider disparity studies and past DBE participation in determining the need for adjustments to the Base Figure above, if it had such available. However, it did not find a disparity study that would be beneficial for this purpose but does now have past Parish DBE participation program that the Parish can draw information from. The Parish interviewed existing and recent past companies that did work with the Parish's other projects, including past FTA funded projects and activities and also several DBE programs from other communities that use FTA funds. It found that the Parish has been successful in attracting and procuring several DBE certified companies or sub-contractors to the primary bidder. Many of these were not FTA funded projects. This occurred through race neutral participation and with no DBE goals set by the Parish for that type of work. But the Parish also used information gleaned from its FTA DBE program during the past 3 years.

Breakout of Estimated Race-Neutral (RN) and Race-Conscious (RC) Participation. (26.51b)(1-9)

Tangipahoa Parish Government plans to fully meet its DBE goals by using race-neutral measures; however, if the Parish Administration determines that a race-conscious means would be needed to increase DBE participation, it will make changes to DBE program, using the following methods to accomplish this:

1. Providing additional incentives to encourage race-conscious participation and use within public bid documents and solicitations for professional services.
2. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate DBE and other small business participation and provide a wider reach outside of the designated market area.
3. Providing assistance in overcoming limitations, such as inability to bonding or financing.
4. Carrying out information and communication programs on contracting procedures and specific contract opportunities.
5. Providing technical assistance and other services that can include certifying the business as a DBE.
6. 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.
7. 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.

8. Ensuring distribution of the Parish's DBE Directory, through printed or electronic means, to the widest feasible universe of potential prime contractors.
9. Assisting DBEs and other small businesses to develop their capability to utilize emerging technology and conduct business through electronic mail.

The Parish estimates that in meeting the overall goal of 4.9%, it will obtain that percentage from race-neutral participation and 0% through race-conscious measures. The Parish intends to step up its procurement efforts for DBE participation in its projects and funding, along with the increase in getting DBEs certified through the State DOTD certification process.

In order to ensure that our DBE program will be narrowly tailored to overcome any impact of possible discrimination, if the Parish uses contract goals, the Parish will in future goal analysis, adjust the estimated breakout of race-neutral and race-conscious participation, as needed to reflect actual DBE participation. (See 16.51f). And the Parish will track and report race-neutral and race-conscious participation separately.

For reporting purposes, race-neutral DBE participation includes, but is not necessarily limited to, the following:

1. DBE participation through a prime contract a DBE obtains through customary competitive procurement procedures.
2. DBE participation through a subcontract on a prime contract that does not carry a DBE goal.
3. DBE participation on a prime contract exceeding a contract goal.
4. DBE participation through a subcontract from a prime contractor that did not consider a firm's DBE status in making the award.

The Parish will maintain data separately on DBE achievements, in those contracts with or without contract goals, respectively.

Public Participation

Consultation

Section 26.45(g)(1). Before establishing its overall goal, the Parish consulted with the organizations listed in Step 2 above to obtain pertinent information concerning the availability of disadvantaged and non-disadvantaged businesses and the effects of discrimination on opportunities for DBEs. During this consultation process, the Parish attempted to determine if there are any complaints, comments, or other information about any barriers that would hinder or otherwise prevent DBE participation. To date, no instances of the above circumstance that would be relevant to the Parish have been discovered. The Parish has also been keeping a listing of DBE ready, willing, and able consultants, contractors, and sub-contractors that could possibly be interested in the work that the Parish is doing with its FTA funding.

Publication of Goal

The Parish has published a notice of the proposed overall goal, and posted on its website and on Facebook posts, informing the public that the proposed goal and its rationale are available for inspection during normal business hours of the Tangipahoa Parish Government Offices, 206 East Mulberry Street, Amite, LA 70422. This notice also informed the public that these documents were available for thirty (30) days following the date of the published notice and that the Parish would accept comments on the goals for forty-five (45) days from the date of notice. This notice was also published on July 13, 2023 in the official journal for the Parish, which is the Hammond Daily Start. There are no minority newspapers or trade publications known in Tangipahoa Parish nor in the immediate area. The notice included addresses to which comments may be sent and locations where proposals may be reviewed, including the use of public library posting services.

The Parish also posted the DBE public comment notice in a noticeable location on the entry doors to its public buildings.

Note that the Parish received no written comments from the public based upon the notice in the newspaper but spoke with or interviewed the persons listed in the “consultation” section above, which included primarily female or minority persons with appropriate knowledge of business or DBE participation in Tangipahoa Parish.

The Parish will notify FTA of any changes to the overall project goal immediately, as a result of any feedback the Parish may receive from the public notice.

Contract Goals

The Parish will use contract goals to meet any portion of the overall goal that the Parish does not project being able to meet using race-neutral means. Contract goals are established so that, over the period to which overall goal applies, these would be cumulative results in meeting any portion of the Parish’s overall goal that is not projected to be met through the use of race-neutral means.

The Parish will establish contract goals only on those FTA-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).

In accordance with this Section 26.45(f) of the Parish’s DBE Program, the Parish will submit its overall goal to FTA before August 1 of each year, or as required by the Federal agency, if later. Following public consultation, the Parish will publish a notice of the proposed overall goals, or changes to the goals, to inform the public that the proposed goal and its rationale are available for inspection during normal business hours at Tangipahoa Parish Government’s Purchasing Department at 206 Mulberry Street, Amite, LA 70422 for 30 days following the date of the notice, and informing the public that the Parish and FTA will accept comments on the goals for 45 days

from the date of the notice. Notice will be issued in general circulation media and available to and identified minority-focus media. Normally, the Parish will issue this notice by June 1 of each year. The notice will include addresses to which comments may be sent and addresses (including offices and websites) where the proposal may be reviewed.

The Parish's overall goal submission to FTA will include: the goal, a copy of the methodology, worksheets, etc. used to develop the goal; a summary of information and comments received during this public participation process and responses; and proof of publication of the goal in media outlets listed above.

Tangipahoa Parish will begin using its overall goal on November 1 of each year unless it has received other instructions from FTA. If the Parish establishes a goal on a project basis, it will begin using that goal by the time of the first solicitation for a FTA-assisted contract for the project.