

Southeastern Regional Transit Authority



Disadvantaged Business Enterprise (DBE) Goal Methodology

FFY2025-FFY2027

Table of Contents

DBE Goal Submission for Federal Fiscal Years 2025-2027	3
New Goals	3
Publication	3
Minority / Women Contracting Groups	3
Goal Construction	4
Projects	4
Market Area / Geographic Region	5
Information Sources.....	5
Goal Setting Process	6
Step One: Base Figure	6
Federal Fiscal Year 2025.....	7
Federal Fiscal Year 2026.....	9
Federal Fiscal Year 2027.....	10
FY2025-27 Summary of Base Weighted Figures (with Average / Median).....	12
Step Two: Adjustment.....	12
Race-Neutral and Race Conscious Participation	13
Past Goal Attainment.....	13

DBE Goal Submission for Federal Fiscal Years 2025-2027

New Goals

The Southeastern Regional Transit Authority's (SRTA) overall goal for Disadvantaged Business Enterprise (DBE) participation, for the time period of FFY2025 – FFY2027 (October 1, 2024 through September 30, 2027), is set at 2.27% of the Federal financial assistance. The SRTA will expend in DOT-assisted contracts, exclusive of FTA funds to be used for the purchase of transit vehicles as well as non-applicable opportunities, \$2,832,750.00 (DBE Goal: \$64,303.43) in FFY25, \$2,925,082.50 (DBE Goal: \$66,399.37) in FFY26, and \$3,022,644.98 (DBE Goal: \$68,614.04).

In total, over the next three Federal Fiscal Years (FFY25-27), the SRTA has set a goal of expending \$199,316.84 with DBE certified firms. The SRTA estimates that, in meeting this overall goal of 2.27% or \$199,316.84, that the Authority will obtain 2.27% from Race-Neutral participation and 0.00% through Race-Conscious measures.

Publication

The SRTA published a notice announcing the DBE Goal and Methodology established as a part of the DBE program of each applicable Federal Fiscal Year (FFY25-27) on the SRTA (website www.srtabus.com). The SRTA's DBE Goal will continue to be actively shared with the local Chambers (One Southcoast Chamber), Minority Activist groups, and periodically promoted on the SRTA's social media and outreach platforms, as deemed appropriate. Proof of publications can be found with Attachment 1.

The aforementioned notice informed the public that a DBE participation program – including DBE goals and a description (methodology) demonstrating how these goals were developed – will be made available for inspection during normal business hours at the Administrative office (700 Pleasant Street, Suite 530, New Bedford, MA 02740) of the Authority. Notwithstanding, the SRTA and the Department of Transportation will accept comments throughout this period.

Minority / Women Contracting Groups

The SRTA will continue to utilize the newly formed One SouthCoast Chamber for assistance in identifying Chamber members and small business associations in the area. The SRTA anticipates that the Chamber will be a valuable resource for outreach and establishment of relationships with small and minority owned businesses.

In addition to the local Chamber of Commerce organization, the SRTA participates in the Unified Certification Program (UCP) managed by the Massachusetts Department of Transportation (MassDOT). The UCP provides DBE certification for eligible businesses and conducts outreach and training across the state. The SRTA also uses the database maintained by the UCP to locate and verify DBE-certified businesses.

Traditionally, the SRTA has collaborated with peer Regional Transit Authorities to create greater interest in RTA projects from the DBE community. The SRTA intends to continue and expand upon these partnerships in future years.

Goal Construction

Projects

The SRTA is the direct recipient of appropriated, formula section 5307 funds as well as limited section 5339 federal funds – appropriated and small urban – of which are programmed to support various projects, ranging from small-scale operating projects to larger-scale capital projects. Consistent with the previous Goal Methodology reports and historical Semi-Annual Uniform Performance reporting, the SRTA has opted to include traditional operating (operations, maintenance, administrative) expenditures that the SRTA reasonably expects to expend during the next three (3) Federal Fiscal Years (FY25-27).

The following projects will be completed during the period of Federal Fiscal Year 2025 through Federal Fiscal Year 2027 and intended to be accomplished with DOT financial assistance.

Capital Projects and Purchases

The SRTA has programmed various capital replacement and improvement initiatives into the FFY2025, FFY2026, and FFY2027 suite of projects, such as follows:

- Support Vehicle
 - The SRTA has programmed the purchase of operations and maintenance non-revenue / support vehicles in FFY2025, FFY2026, and FFY2027
- Support Equipment
 - The SRTA has programmed the purchase of miscellaneous operations and maintenance support equipment in FFY2025, FFY2026, and FFY2027
- Surveillance and Security Equipment
 - The SRTA has programmed for the replacement and upgrade of essential systemwide surveillance and security (camera) systems in FFY2025
- Transit Enhancements
 - The SRTA has programmed the purchase of transit enhancement items in FFY2025, FFY2026 and FFY2027
- Intelligent Transportation System (ITS)
 - The SRTA has programmed multiple intelligent transportation systems (ITS) projects in FFY2025, FFY2026, and FFY2026.
- Information Technology / Computer Equipment
 - The SRTA has programmed for the replacement of various critical information technology systems in FFY2025, FFY2026, and FFY2026
- Tires
 - The SRTA has programmed the purchase of leased transit vehicles tires in FFY2025, FFY2026, and FFY2027, with the intent of releasing the next multi-year procurement in the second quarter of FFY2027
- Architectural and Engineering Services
 - The SRTA has programmed on-call architectural and engineering support services in FFY2025, FFY2026, and FFY2027, with the intent of releasing the next multi-year procurement in the first quarter of FFY2027

Operating Projects and Purchases

The SRTA has programmed various ongoing operations and maintenance initiatives into the FFY2025, FFY2026, and FFY2027 suite of projects. Ongoing operations and maintenance expenses typically include the following:

- Operations / Maintenance – Rolling Stock
 - Motor Vehicle Supplies
 - Supplies for use in the maintenance of vehicles such as cleaning supplies / disinfectant, paper towels, bus wash soap, and windshield fluid, etc.
 - Motor Vehicle Parts
 - Replacement (preventative and repair) parts such as filters, brake rotors, brake pads, bulbs, and other related items
 - Fuel, Fluid, and Lubes
 - Fuel (Gasoline / Diesel), oil, and other necessary fluids
- Operations / Maintenance – Facilities
 - Shop / Facilities Supplies
 - General supplies for use in facilities, such as paper towels, cleaning compounds, soaps / sanitization solutions, bulbs, and other related items
 - Administrative Supplies
 - Office and industrial supplies
 - Waste Removal
 - Solid waste and recyclable material collection services
 - Security Guard Services
 - Security guard and property protection services

Facility Rehabilitation and Renovation Projects

The SRTA will use 5339 funds to accomplish a number of small to mid-size rehabilitation and renovation projects at multiple facilities – including the New Bedford Terminal, New Bedford Maintenance Facility, Fall River Terminal, and Fall River Maintenance Facility – throughout the three-year period (FFY2025-27) of this goal methodology. The anticipated projects are estimated to range from \$30,000 to \$180,000. Applicable project scopes and costs will be fine-tuned with the assistance of the SRTA’s current on-call architectural and engineering firm.

Market Area / Geographic Region

The SRTA has determined the State of Massachusetts as the applicable market area or geographic region. The SRTA established this area based on a substantial number of past projects being awarded to firms from across the State, further demonstrating the SRTA’s wide-spread reach across the Commonwealth.

Information Sources

The SRTA utilized a combination of sources to develop the program of projects associated with this DBE Goal Methodology.

The SRTA is required to submit a 5-year Capital Improvement Plan (CIP) to the Massachusetts Department of Transportation (MassDOT). At this time, the FY24-28 CIP (FFY2024 through FFY2028) is considered to be the “Active” project listing for capially funded projects.

Note: The SRTA’s FY25-29 CIP submission has since been endorsed and will be considered active upon October 1.

Additionally, on an annual basis, the SRTA collaborates with the Authority’s Contract Operator to develop a “Needs Assessment and Listing” in order to determine the various projects that are reasonably expected to occur within the immediate 1 to 3-year horizon. This exercise is performed to uncover both operational and capital projects.

If at any time the existing plan (or plans) indicated above experience significant changes, the SRTA will revisit the DBE goal to ensure that the number of projects or opportunities has stayed within reason.

The SRTA used two (2) sources to determine the availability of total firms and the number of DBE’s certified in the established market area or geographic region.

1. To determine the overall number of firms – per applicable NAICS code – within the established market area or geographic region, the SRTA referenced the Census Bureau's County Business Pattern (CBP) database that is made available by the U.S. Census. The Census Bureau's County Business Pattern (CBP) database is searchable by various criteria such as state, county, NAICS code as well as firm status or size.

The SRTA identified 12, 608 firms – via the Census Bureau's County Business Pattern (CBP) database – that are associated with the applicable NAICS code(s) and located within the same market area or geographic region.

2. The SRTA is part of the Unified Certification Program (UCP) of the Commonwealth of Massachusetts and the Massachusetts Department of Transportation. The Commonwealth’s Supplier Diversity Office (SDO) works to certify Disadvantage Business Enterprises and, in doing so, keeps a directory of these businesses on their website. This is a searchable and downloadable directory, which allows for DBE certified businesses to be sorted by NAICS code.

The SRTA downloaded the SDO directory, then categorized, sorted, and checked for duplicate listings in similar categories. Ultimately, in doing so, the SRTA identified 422 DBE certified firms associated with the applicable NAICS codes.

Goal Setting Process

Step One: Base Figure

In order to determine the overall goal, the SRTA first established a base figure – using project weights and relative availability of associated DBEs – of which has been outlined below.

In developing the project weights, each of the projects, as indicated previously, were assigned to the most relevant NAICS code and weighted by the associated project costs (as compared to the total cost of projects) in order to demonstrate equity across the associated projects.

In developing the baseline figure for the relative availability of DBE firms per NAICS code, the SRTA utilized the Massachusetts Supplier Diversity Office (SDO) DBE Directory to define the number of ready, willing, and able DBEs located within SRTA's market area for each of the projects, as previously indicated.

Next, the SRTA utilized the Census Bureau's County Business Pattern (CBP) database to determine the total number of ready, willing, and able firms available within the SRTA's market area that perform work associated with the assigned NAICS codes. After determining the number of DBE firms and the number of all (ready, willing, and able) firms in each applicable NAICS code, the SRTA divided the number of DBE firms by the total number of all (ready, willing, and able) firms in each applicable NAICS.

Federal Fiscal Year 2025

For Step 1, the Authority determined the weight of associated projects by NAICS Code:

Weight of each type of work by NAICS Code

NAICS Code	Description	FTA Funds on Project	% of total FTA funds (weight)
236220	Commercial and Institutional Building Construction	\$ 720,000	0.1510
238990	Specialty Trade Contractors - Asphaltting, Parking Area	\$ 348,480	0.0731
339950	Sign Manufacturing	\$ 401,000	0.0841
423120	Motor Vehicle Supplies & Parts	\$ 730,400	0.1532
423430	Computer Equipment and Software Merchant Wholesalers	\$ 174,000	0.0365
423840	Industrial Supplies Merchant Wholesalers	\$ 60,000	0.0126
423860	Support Equipment / Transit Enhancements	\$ 88,000	0.0185
424720	Petroleum Products (Fluids / Lubes)	\$ 74,676	0.0157
441110	Support Vehicle	\$ 88,000	0.0185
441310	Automotive Parts & Accessories	\$ 109,600	0.0230
453210	Office Supplies	\$ 55,000	0.0115
454310	Fuel	\$ 1,732,000	0.3632
541511	Computer Programming Services	\$ 24,000	0.0050
561621	Investigative and Security System Installation and Services	\$ 120,000	0.0252
561730	Landscaping Services	\$ 10,000	0.0021
562111	Waste Collection	\$ 33,900	0.0071
Total		\$ 4,769,056	1.0000

For Step 2, the Authority determined the relative availability of DBE firms by NAICS Code:

Relative availability of DBE's by NAICS Code

<i>NAICS Code</i>	<i>Project</i>	<i>Number of DBEs Available to Perform This Work</i>	<i>Number of All Firms Available (Including DBEs)</i>	<i>Relative Availability</i>
236220	Commercial and Institutional Building Construction	53	795	0.0667
238990	Specialty Trade Contractors - Asphalt, Parking Area	73	933	0.0782
339950	Sign Manufacturing	7	117	0.0598
423120	Motor Vehicle Supplies & Parts	5	212	0.0236
423430	Computer Equipment and Software Merchant Wholesalers	4	204	0.0196
423840	Industrial Supplies Merchant Wholesalers	12	128	0.0938
423860	Support Equipment / Transit Enhancements	19	32	0.5938
424720	Petroleum Products (Fluids / Lubes)	3	32	0.0938
441110	Support Vehicle	0	489	0.0000
441310	Automotive Parts & Accessories	0	654	0.0000
453210	Office Supplies	0	92	0.0000
454310	Fuel	2	395	0.0051
541511	Computer Programming Services	70	1,885	0.0371
561621	Investigative and Security System Installation and Services	4	141	0.0284
561730	Landscaping Services	23	4,539	0.0051
562111	Waste Collection	6	274	0.0219
Total		281	10,922	0.0257

For Step 3, the Authority determined the weighted availability of associated projects by NAICS Code:

Weighted Base Figure

<i>NAICS Code</i>	<i>Project</i>	<i>Weight</i>	<i>Availability</i>	<i>Weighted Base Figure</i>
236220	Commercial and Institutional Building Construction	0.1510	0.0667	0.0101
238990	Specialty Trade Contractors - Asphalt, Parking Area	0.0731	0.0782	0.0057
339950	Sign Manufacturing	0.0841	0.0598	0.0050
423120	Motor Vehicle Supplies & Parts	0.1532	0.0236	0.0036
423430	Computer Equipment and Software Merchant Wholesalers	0.0365	0.0196	0.0007
423840	Industrial Supplies Merchant Wholesalers	0.0126	0.0938	0.0012
423860	Support Equipment / Transit Enhancements	0.0185	0.5938	0.0110
424720	Petroleum Products (Fluids / Lubes)	0.0157	0.0938	0.0015
441110	Support Vehicle	0.0185	0.0000	0.0000
441310	Automotive Parts & Accessories	0.0230	0.0000	0.0000
453210	Office Supplies	0.0115	0.0000	0.0000
454310	Fuel	0.3632	0.0051	0.0018
541511	Computer Programming Services	0.0050	0.0371	0.0002
561621	Investigative and Security System Installation and Services	0.0252	0.0284	0.0007
561730	Landscaping Services	0.0021	0.0051	0.0000
562111	Waste Collection	0.0071	0.0219	0.0002
Total				0.0416
Total Expressed as Percent				4.16%

Federal Fiscal Year 2025 Base Weighted Figure: 4.16%

Federal Fiscal Year 2026

For Step 1, the Authority determined the weight of associated projects by NAICS Code:

Weight of each type of work by NAICS Code

NAICS Code	Description	FTA Funds on Project	% of total FTA funds (weight)
236220	Commercial and Institutional Building Construction	\$ 105,000	0.0282
339950	Sign Manufacturing	\$ 1,050	0.0003
423120	Motor Vehicle Supplies & Parts	\$ 766,920	0.2062
423430	Computer Equipment and Software Merchant Wholesalers	\$ 519,500	0.1397
423840	Industrial Supplies Merchant Wholesalers	\$ 63,000	0.0169
423860	Support Equipment / Transit Enhancements	\$ 88,000	0.0237
424720	Petroleum Products (Fluids / Lubes)	\$ 78,410	0.0211
441110	Support Vehicle	\$ 60,000	0.0161
441310	Automotive Parts & Accessories	\$ 115,080	0.0309
453210	Office Supplies	\$ 57,750	0.0155
454310	Fuel	\$ 1,818,600	0.4889
561730	Landscaping Services	\$ 10,500	0.0028
562111	Waste Collection	\$ 35,595	0.0096
Total		\$ 3,719,405	1.0000

For Step 2, the Authority determined the relative availability of DBE firms by NAICS Code:

Relative availability of DBE's by NAICS Code

NAICS Code	Project	Number of DBEs Available to Perform This Work	Number of All Firms Available (Including DBEs)	Relative Availability
236220	Commercial and Institutional Building Construction	53	795	0.0667
339950	Sign Manufacturing	7	117	0.0598
423120	Motor Vehicle Supplies & Parts	5	212	0.0236
423430	Computer Equipment and Software Merchant Wholesalers	4	204	0.0196
423840	Industrial Supplies Merchant Wholesalers	12	128	0.0000
423860	Support Equipment / Transit Enhancements	19	32	0.5938
424720	Petroleum Products (Fluids / Lubes)	3	32	0.0938
441110	Support Vehicle	0	489	0.0000
441310	Automotive Parts & Accessories	0	654	0.0000
453210	Office Supplies	0	92	0.0000
454310	Fuel	2	395	0.0051
561730	Landscaping Services	23	4,539	0.0051
562111	Waste Collection	6	274	0.0219
Total		134	7,963	0.0168

For Step 3, the Authority determined the weighted availability of associated projects by NAICS Code:

Weighted Base Figure

NAICS Code	Project	Weight	Availability	Weighted Base Figure
236220	Commercial and Institutional Building Construction	0.0282	0.0667	0.0019
339950	Sign Manufacturing	0.0003	0.0598	0.0000
423120	Motor Vehicle Supplies & Parts	0.2062	0.0236	0.0049
423430	Computer Equipment and Software Merchant Wholesalers	0.1397	0.0196	0.0027
423840	Industrial Supplies Merchant Wholesalers	0.0169	0.0000	0.0000
423860	Support Equipment / Transit Enhancements	0.0237	0.5938	0.0140
424720	Petroleum Products (Fluids / Lubes)	0.0211	0.0938	0.0020
441110	Support Vehicle	0.0161	0.0000	0.0000
441310	Automotive Parts & Accessories	0.0309	0.0000	0.0000
453210	Office Supplies	0.0155	0.0000	0.0000
454310	Fuel	0.4889	0.0051	0.0025
561730	Landscaping Services	0.0028	0.0051	0.0000
562111	Waste Collection	0.0096	0.0219	0.0002

Total	0.0282
Total Expressed as Percent	2.82%

Federal Fiscal Year 2023 Base Weighted Figure: 2.82%

Federal Fiscal Year 2027

For Step 1, the Authority determined the weight of associated projects by NAICS Code:

Relative availability of DBE's by NAICS Code

NAICS Code	Project	Number of DBEs Available to Perform This Work	Number of All Firms Available (Including DBEs)	Relative Availability
236220	Commercial and Institutional Building Construction	53	795	0.0667
339950	Sign Manufacturing	7	117	0.0598
423120	Motor Vehicle Supplies & Parts	5	212	0.0236
423130	Tire (Tire and Tube Wholesalers)	4	204	0.0196
423430	Computer Equipment and Software Merchant Wholesalers	4	204	0.0196
423840	Industrial Supplies Merchant Wholesalers	12	128	0.0000
423860	Support Equipment / Transit Enhancements	19	32	0.5938
424720	Petroleum Products (Fluids / Lubes)	3	32	0.0938
441110	Support Vehicle	0	489	0.0000
441310	Automotive Parts & Accessories	0	654	0.0000
453210	Office Supplies	0	92	0.0000
454310	Fuel	2	395	0.0051
561612	Security Guard Services	5	170	0.0294
561730	Landscaping Services	23	4,539	0.0051
562111	Waste Collection	6	274	0.0219

Total	143	8,337	0.0172
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For Step 2, the Authority determined the relative availability of DBE firms by NAICS Code:

Weight of each type of work by NAICS Code

NAICS Code	Description	FTA Funds on Project	% of total FTA funds (weight)
236220	Commercial and Institutional Building Construction	\$ 110,250	0.0243
339950	Sign Manufacturing	\$ 1,103	0.0002
423120	Motor Vehicle Supplies & Parts	\$ 805,266	0.1777
423130	Tire (Tire and Tube Wholesalers)	\$ 378,000	0.0834
423430	Computer Equipment and Software Merchant Wholesalers	\$ 293,075	0.0647
423840	Industrial Supplies Merchant Wholesalers	\$ 66,150	0.0146
423860	Support Equipment / Transit Enhancements	\$ 8,000	0.0018
424720	Petroleum Products (Fluids / Lubes)	\$ 82,331	0.0182
441110	Support Vehicle	\$ 124,000	0.0274
441310	Automotive Parts & Accessories	\$ 120,834	0.0267
453210	Office Supplies	\$ 60,638	0.0134
454310	Fuel	\$ 1,909,530	0.4214
561612	Security Guard Services	\$ 524,160	0.1157
561730	Landscaping Services	\$ 11,025	0.0024
562111	Waste Collection	\$ 37,375	0.0082
Total		\$ 4,531,737	1.0000

For Step 3, the Authority determined the weighted availability of associated projects by NAICS Code:

Weighted Base Figure

NAICS Code	Project	Weight	Availability	Weighted Base Figure
236220	Commercial and Institutional Building Construction	0.0243	0.0667	0.0016
339950	Sign Manufacturing	0.0002	0.0598	0.0000
423120	Motor Vehicle Supplies & Parts	0.1777	0.0236	0.0042
423130	Tire (Tire and Tube Wholesalers)	0.0834	0.0196	0.0016
423430	Computer Equipment and Software Merchant Wholesalers	0.0647	0.0196	0.0013
423840	Industrial Supplies Merchant Wholesalers	0.0146	0.0000	0.0000
423860	Support Equipment / Transit Enhancements	0.0018	0.5938	0.0010
424720	Petroleum Products (Fluids / Lubes)	0.0182	0.0938	0.0017
441110	Support Vehicle	0.0274	0.0000	0.0000
441310	Automotive Parts & Accessories	0.0267	0.0000	0.0000
453210	Office Supplies	0.0134	0.0000	0.0000
454310	Fuel	0.4214	0.0051	0.0021
561612	Security Guard Services	0.1157	0.0294	0.0034
561730	Landscaping Services	0.0024	0.0051	0.0000
562111	Waste Collection	0.0082	0.0219	0.0002
Total				0.0172
Total Expressed as Percent				1.72%

Federal Fiscal Year 2024 Base Weighted Figure: 4.37%

FY2025-27 Summary of Base Weighted Figures (with Average / Median)

Year	Goal (Decimal)	Goal (%)
2025	0.0416	4.16%
2026	0.0282	2.82%
2027	0.0172	1.72%
Average	0.0290	2.90%
Median	0.0282	2.82%

Step Two: Adjustment

Utilizing the median Base Weighted Figure from Step 1 (2.82%), the SRTA's Adjusted Figure would be calculated as follows:

Adjusted Calculation of Weighted Base Figure	
Step One Calculation	2.82%
a) Past Participation Median	1.71%
a) Adjustment due to Past Participation	2.27%
b) Adjustments due to Disparity Studies	0.00%
Total Adjusted Goal	2.27%

The SRTA examined all the evidence available in the SRTA's jurisdiction to determine what adjustment, if any, would be needed to the base figure in order to arrive at an overall goal (i.e. past participation, disparity studies, etc.). A summary of findings is as follows:

1. Past Participation

The SRTA's historical DBE participation has proven to be irregular and, unfortunately, the SRTA is not expected to reach the DBE goal (2.98%) set during the prior 3-year reporting period (FFY22-24 Goal-Setting Period).

The SRTA attributes this shortfall to the focus and commitment to ongoing, multi-year mid to large scale projects resulting in fewer alternative / small projects – that may or may not have attracted additional DBE firms – being undertaken during this 3-year period. Additionally, throughout the past 3 years, the SRTA has periodically shifted resources and bandwidth to support the industry-wide greenhouse gas emission reduction initiatives.

The Authority's emphasis, over the upcoming 3-year period, is anticipated to continue to be targeted

toward State of Good Repair (SGR) – through the acquisition of vehicle replacements (rolling stock and non-rolling stock) and facility repairs / renovations – as well as the advancement of the ongoing, multi-year Intelligent Transportation Systems (ITS) project.

2. Disparity Studies

The SRTA researched disparity studies that have been conducted for the Commonwealth of Massachusetts and could only find one for our state. This study was done by NERA Economic Consulting for a joint effort by the Commonwealth’s Division of Capital Asset Management and the Massachusetts Housing Finance Agency in September 2010. *Race, Sex, and Business Enterprise: Evidence from the Commonwealth of Massachusetts: Volume II* shows evidence of racial disparity in the market area (State of Massachusetts). The Massachusetts Department of Transportation has undertaken a diversity study that would be more applicable to an agency such as the SRTA; but that study has not been completed at this time. Although not everything in the DCAM study is relevant to the SRTA, the data on construction and design can be used, as well as the statistical disparities in the ability of DBE has to get financing, bonding, and insurance to participate. The study encourages an upward adjustment to baseline estimates of DBE availability to account for the continuing effects of discrimination on minority and women-owned businesses. The disparity ratio cited in the study for Construction related businesses was 0.636¹(NERA Economic Consulting, 2010).

As indicated previously, the SRTA has one project line deliberately programmed for construction-related projects within the applicable 3-year period (FFY25-27) covered by this report. This construction-related project line will consist of a number of smaller projects, which in turn, are expected to be able to attract smaller and disadvantaged firms. Overall, this construction-related project line accounts for less than 25% of the total projects of the applicable fiscal period.

Based on this assessment and evidentiary information, as presented above, the SRTA will adjust its overall DBE goal from 2.82% to 2.27% in order to provide the most accurate and achievable goal for the SRTA.

Race-Neutral and Race Conscious Participation

Past Goal Attainment

It is anticipated that the SRTA will not reach the current goal of 2.98% for the past three fiscal periods (FFY2022-24) upon submission of the final Semi-Annual Uniform Reporting for FFY2024. Historical performance – over the presently active Goal period – is as follows:

1. In 2022, there was 1.62% DBE participation
2. In 2023, there was .92% DBE participation
3. In 2024, there was 1.71% DBE participation
 - a. 2024 information is for reporting period October 2023 through March 2024

¹ (NERA Economic Consulting, 2010) Table 5.21, page 118

Traditionally, the SRTA's past attainments have been made by Race-Neutral measures, meaning that no Race-Conscious or Contract Goals were set. Given this, the SRTA will continue to strive to meet the maximum feasible portion of its overall goal by using Race-Neutral means. The SRTA intends to continue to utilize specific race-neutral methods in order to meet the goal. This includes:

1. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate participation by DBEs and other small businesses and by making contracts more accessible to small businesses.
 - The SRTA will continue to allow potential bidders to conduct site visits at times of their choosing, making the site visit more convenient for the potential bidders.
2. Provide assistance in overcoming limitations such as inability to obtain bonding or financing (e.g., by such means as simplifying the bonding process, reducing bonding requirements, eliminating the impact of surety costs from bids, and providing services to help DBEs, and other small businesses, obtain bonding and financing);
3. Providing technical assistance and other services to potential bidders.
 - The SRTA will continue to work with potential bidders to ensure complete and concise understanding of applicable projects, including compliance with federal, state, or local regulations, respectively.
4. Providing instruction, guidance, and monitoring to current contractors, including the current Operating Contractor, on the utilization of DBE certified companies and proper reporting of such.
5. Carrying out information and communications programs on contracting procedures and specific contract opportunities (e.g., ensuring the inclusion of DBEs, and other small businesses, on recipient mailing lists for bidders; ensuring the dissemination to bidders on prime contracts of lists of potential subcontractors; provision of information in languages other than English, where appropriate).
 - The SRTA utilizes the MassDOT UCP as a directory of DBE certified firms. DBE certified companies will be directly contacted as part of the procurement process for each capital project.