

The Vermont Agency of Transportation's Disadvantaged Business Enterprise (DBE) Triennial Goal And Goal Setting Methodology for FFY 2018-2020

Introduction and Overview of Goal Setting Process:

The Vermont Agency of Transportation (VTrans) has availed itself of a variety of techniques to comply with the goal setting provisions for participation by disadvantaged business enterprises (DBEs) in its DOT-assisted contracting program, as required by Section 26.45 of the DBE Regulations.

VTrans has solicited ideas and suggestions for developing and implementing overall goals by inviting input from the women, minority, and general contracting community. In keeping with our past process, we utilized a collaborative and inclusive approach to formulating a goal setting methodology, which included a series of open meetings with industry and community groups, and prime and DBE contractors and consultants.

Information concerning the purpose and elements of the DBE Program were widely disseminated in writing, and through a series of presentations and public meetings involving a diverse range of individuals and organizations, including our currently certified DBEs, our non-DBE contractors and consultants, the Associated General Contractors - Vermont Chapter, the American Council of Engineering Consultants, the Vermont Commission on Women, the U.S. Small Business Administration, the Vermont Public Transportation Association, the Vermont Procurement Technical Assistance Center, the Vermont Agency of Commerce and Community Development, the Vermont Women's Business Center, the Vermont Small Business Development Centers, the Vermont Community Action Agencies, the Vermont Department of Labor, the Micro Business Development Program, the Women's Small Business Program, Vermont Works for Women (formerly Northern New England Tradeswomen), Vermont Chambers of Commerce, Vermont Regional Planning Commissions, the Vermont League of Cities and Towns, the University of Vermont Transportation Research Center, public transit providers and various towns and municipalities.

Feedback from these individuals and organizations included information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the scope and effectiveness of VTrans' efforts to establish a level playing field for the participation of DBEs.

The final goal for each of our USDOT-assisted contracting programs was established through an ongoing dialogue with all our stakeholders and represents an informed consent by stakeholder groups.

In accordance with the requirements of 49 CFR Part 26, Section 26.45 VTrans publishes the goals in various media to solicit public comment.

To comply with the goal setting provisions of the DBE regulations, VTrans has employed the two step process outlined in Section 26.45, by first creating a baseline figure reflecting the relative availability of "ready, willing and able DBEs" in our marketplace, and then examining all relevant

evidence, including past DBE participation, to determine what adjustments, if any, are needed to arrive at our overall goal.

VTrans has affirmed its commitment to meeting the maximum feasible portion of our overall goal using race-neutral means. In addition to summarizing our current race-neutral program components, we have identified a variety of new strategies, the implementation of which will serve as additional program performance measures.

Amount of Goal:

Federal Transit Administration (FTA) Goal:

In FY 2018 – FY 2020, VTrans intends to expend 1.65% of the federal financial assistance received from the Federal Transit Administration with small business concerns owned and controlled by socially and economically disadvantaged individuals (DBEs). It is the intent of VTrans that this expenditure be obtained through a race and gender neutral program.

Goal Methodology:

Goal Methodology: Federal Transit Administration (FTA) Goal:

Pursuant to February 2010 USDOT rule amendments to 49 CFR Section 26.45, VTrans' overall annual goal of 1.65% on FTA funded contracts is effective for a period of three years: FY 2018 – FY 2020. The following describes the goal methodology used to determine this three year goal:

Step 1: Base Figure for the Relative Availability of DBEs

As specified in Section 26.45(c) of the DBE Regulations, the method used to calculate the relative availability of DBEs ("base figure") for Step 1 of the goal setting process is a percentage figure calculated by dividing a number representing available DBEs by a number representing all available firms (Method 1). VTrans employed the use of our DBE directory and Census Bureau Data for calculating a base figure. We obtained our data and calculated the relative availability percentage in the following manner:

- We reviewed VTrans past spending for FY15-16 on direct contracts from the agency, and tabulated our subrecipients (rural transit providers in Vermont) for their operating and planning spending for this period. This spending was subdivided by line item, and all spending for wages and other non-contract spending was excluded. To these operating and planning figures, we added projected capital spending for the FY18-FY20 period based on capital requests from the subrecipients and a VTrans forecast as to which items are likely to be funded. The itemized spending was then categorized by six-digit North American Industry Classification System (NAICS) code. The average spending for operations and planning was multiplied by three (to represent the coming three-year period) and the capital spending projections were added to those figures. This collection of codes, federal spending, and their descriptions are shown below in Table 1.

Table 1. NAICS Codes

NAICS Code	Description	FY18-20 Spending	% of Total
237310	Highway, Street, and Bridge Construction	\$10,980	0.1%
238110	Poured Concrete Foundation and Structure Contractors	\$68,725	0.4%
238130	Framing Contractors	\$48,000	0.3%
238150	Glass and Glazing Contractors	\$2,614	0.0%
238160	Roofing Contractors	\$50,944	0.3%
238190	Other Foundation, Structure, and Building Exterior Contractors	\$124,317	0.8%
238210	Electrical Contractors and Other Wiring Installation Contractors	\$104,755	0.6%
238220	Plumbing, Heating, and Air-Conditioning Contractors	\$37,288	0.2%
238290	Other Building Equipment Contractors	\$283,401	1.7%
238310	Drywall and Insulation Contractors	\$187,831	1.1%
238320	Painting and Wall Covering Contractors	\$67,000	0.4%
238350	Finish Carpentry Contractors	\$87,139	0.5%
238390	Other Building Finishing Contractors	\$9,242	0.1%
238910	Site Preparation Contractors	\$3,891	0.0%
321992	Prefabricated Wood Building Manufacturing	\$29,600	0.2%
323111	Commercial Printing (except Screen and Books)	\$56,248	0.3%
333921	Elevator and Moving Stairway Manufacturing	\$7,011	0.0%
334220	Radio and Wireless Communications Equipmt. Manufacturing	\$32,607	0.2%
334310	Audio and Video Equipment Manufacturing	\$125,924	0.8%
334519	Other Measuring and Controlling Device Manufacturing	\$331,600	2.0%
335129	Other Lighting Equipment Manufacturing	\$8,400	0.1%
339950	Sign Manufacturing	\$15,642	0.1%
423110	Automobile and Other Motor Vehicle Merchant Wholesalers	\$126,000	0.8%
423430	Computer Equipment and Software Merchant Wholesalers	\$476,457	2.9%
423820	Farm and Garden Machinery and Equipment Merchant Wholesalers	\$74,480	0.5%
423830	Industrial Machinery and Equipment Merchant Wholesalers	\$244,808	1.5%
424320	Men's and Boys' Clothing and Furnishings Merchant Wholesalers	\$106,122	0.6%
441310	Automotive Parts and Accessories Stores	\$888,663	5.4%
441320	Tire Dealers	\$238,982	1.5%
442110	Furniture Stores	\$17,401	0.1%
442210	Floor Covering Stores	\$15,600	0.1%
444110	Home Centers	\$45,450	0.3%
443141	Household Appliance Stores	\$5,192	0.0%
444130	Hardware Stores	\$14,675	0.1%
444190	Other Building Material Dealers	\$32,938	0.2%
451212	News Dealers and Newsstands	\$2,367	0.0%
453210	Office Supplies and Stationery Stores	\$396,497	2.4%
453220	Gift, Novelty, and Souvenir Stores	\$1,336	0.0%
454210	Vending Machine Operators	\$2,065	0.0%
454310	Fuel Dealers	\$3,001,158	18.4%

485310	Taxi Service	\$549,187	3.4%
485991	Special Needs Transportation	\$420,135	2.6%
488410	Motor Vehicle Towing	\$13,714	0.1%
511110	Newspaper Publishers	\$107,037	0.7%
511210	Software Publishers	\$422,120	2.6%
515112	Radio Stations	\$1,074	0.0%
517110	Wired Telecommunications Carriers	\$165,254	1.0%
517210	Wireless Telecommunications Carriers (except Satellite)	\$184,046	1.1%
518210	Data Processing, Hosting, and Related Services	\$5,294	0.0%
519130	Internet Publishing and Broadcasting and Web Search Portals	\$33,377	0.2%
524126	Direct Property and Casualty Insurance Carriers	\$1,902,311	11.6%
524128	Other Direct Insurance (except Life, Health, and Medical) Carriers	\$160,253	1.0%
532420	Office Machinery and Equipment Rental and Leasing	\$29,451	0.2%
541110	Offices of Lawyers	\$108,339	0.7%
541211	Offices of Certified Public Accountants	\$272,705	1.7%
541310	Architectural Services	\$18,826	0.1%
541430	Graphic Design Services	\$4,234	0.0%
541512	Computer Systems Design Services	\$540,610	3.3%
541611	Administrative Management and Management Consulting Services	\$987,300	6.0%
541613	Marketing Consulting Services	\$234,596	1.4%
541620	Environmental Consulting Services	\$4,406	0.0%
541690	Other Scientific and Technical Consulting Services	\$1,083,451	6.6%
541890	Other Services Related to Advertising	\$142,008	0.9%
541921	Photography Studios, Portrait	\$21,588	0.1%
561621	Security Systems Services (except Locksmiths)	\$4,641	0.0%
561720	Janitorial Services	\$266,040	1.6%
561730	Landscaping Services	\$40,712	0.2%
561790	Other Services to Buildings and Dwellings	\$32,453	0.2%
562111	Solid Waste Collection	\$25,508	0.2%
611430	Professional and Management Development Training	\$5,690	0.0%
621111	Offices of Physicians (except Mental Health Specialists)	\$1,200	0.0%
621910	Ambulance Services	\$61,922	0.4%
621999	All Other Miscellaneous Ambulatory Health Care Services	\$74,716	0.5%
722513	Limited-Service Restaurants	\$14,747	0.1%
811111	General Automotive Repair	\$874,600	5.4%
811212	Computer and Office Machine Repair and Maintenance	\$95,122	0.6%
811310	Commercial and Industrial Machinery and Equipmt. Maintenance	\$53,399	0.3%
	TOTAL	\$16,400,149	100.0%

- We determined the number of ready, willing and able DBEs in our market from our DBE directory for each of these NAICS codes. Then, using the Census Bureau's County Business Pattern (CBP) database, we determined the number of all ready, willing and able businesses available in our market that perform work in the same NAICS codes. For the purpose of

setting an overall DBE goal for funds received from FTA, it was determined that our market or service area was the State of Vermont, with a few exceptions.

- The first listed code, Highway, Street and Bridge Construction had 24 DBEs in the registry, but only four of these were actually based in Vermont. Eleven of the DBEs in the registry were based in Massachusetts or New York. Thus, the total number of Massachusetts and New York establishments in this category were added to the 29 total establishments in Vermont to better reflect the market area for this service.
- Five codes in the 5415-5416 series were treated similarly. These codes have the highest number of DBE firms in the VAOT registry, but the great majority of these DBE firms are from outside of Vermont. The work done under these codes, mostly consulting services, can be more easily done by firms from anywhere in the country compared to most of the other NAICS codes which are more easily done by firms in Vermont. For each code, the most common source states for the DBEs were identified, so that states housing at least half of the DBE firms would be represented. The states included for each of these codes are shown below. All of the states are in the northeastern part of the US.

NAICS Code	DBE firms in VAOT registry	VT DBE firms in VAOT registry	Other states with firms in registry	DBE firms in registry coming from these states
541512	16	0	MA NH MD PA	8
541611	26	3	MA MD PA	11
541613	10	1	MA	4
541620	24	9	MA NH	10
541690	16	2	MA NH NJ	9

Table 2 shows the number of VAOT-certified DBE firms in each of these categories and calculates the unweighted relative availability of DBEs.

Table 2. Relative Availability of DBE Firms by NAICS Code

NAICS Code	Description	VT DBE Firms	CBP Total for VT
237310	Highway, Street, and Bridge Construction	24	726*
238110	Poured Concrete Foundation and Structure Contractors	2	65
238130	Framing Contractors	1	53
238150	Glass and Glazing Contractors	1	12
238160	Roofing Contractors	2	78
238190	Other Foundation, Structure, and Building Exterior Contractors	2	11
238210	Electrical Contractors and Other Wiring Installation Contractors	8	271
238220	Plumbing, Heating, and Air-Conditioning Contractors	3	302
238290	Other Building Equipment Contractors	3	21
238310	Drywall and Insulation Contractors	2	69
238320	Painting and Wall Covering Contractors	5	153
238350	Finish Carpentry Contractors	0	99
238390	Other Building Finishing Contractors	2	13
238910	Site Preparation Contractors	17	324
321992	Prefabricated Wood Building Manufacturing	0	8
323111	Commercial Printing (except Screen and Books)	1	44
333921	Elevator and Moving Stairway Manufacturing	0	0

334220	Radio and Wireless Communications Equipmt. Manufacturing	0	0
334310	Audio and Video Equipment Manufacturing	0	0
334519	Other Measuring and Controlling Device Manufacturing	0	3
335129	Other Lighting Equipment Manufacturing	0	1
339950	Sign Manufacturing	1	11
423110	Automobile and Other Motor Vehicle Merchant Wholesalers	0	13
423430	Computer Equipment and Software Merchant Wholesalers	2	14
423820	Farm and Garden Machinery and Equipment Merchant Wholesalers	0	30
423830	Industrial Machinery and Equipment Merchant Wholesalers	0	41
424320	Men's and Boys' Clothing and Furnishings Merchant Wholesalers	0	9
441310	Automotive Parts and Accessories Stores	0	102
441320	Tire Dealers	0	46
442110	Furniture Stores	0	58
442210	Floor Covering Stores	0	33
444110	Home Centers	0	17
443141	Household Appliance Stores	0	33
444130	Hardware Stores	0	79
444190	Other Building Material Dealers	4	116
451212	News Dealers and Newsstands	0	1
453210	Office Supplies and Stationery Stores	0	19
453220	Gift, Novelty, and Souvenir Stores	0	76
454210	Vending Machine Operators	0	6
454310	Fuel Dealers	0	110
485310	Taxi Service	0	13
485991	Special Needs Transportation	1	6
488410	Motor Vehicle Towing	1	18
511110	Newspaper Publishers	0	42
511210	Software Publishers	1	29
515112	Radio Stations	0	22
517110	Wired Telecommunications Carriers	0	105
517210	Wireless Telecommunications Carriers (except Satellite)	0	20
518210	Data Processing, Hosting, and Related Services	3	34
519130	Internet Publishing and Broadcasting and Web Search Portals	0	21
524126	Direct Property and Casualty Insurance Carriers	0	41
524128	Other Direct Insurance (except Life, Health, and Medical) Carriers	0	1
532420	Office Machinery and Equipment Rental and Leasing	0	1
541110	Offices of Lawyers	1	423
541211	Offices of Certified Public Accountants	3	143
541310	Architectural Services	4	78
541430	Graphic Design Services	7	78
541512	Computer Systems Design Services	16	5,559*
541611	Administrative Management and Management Consulting Services	26	6,365*
541613	Marketing Consulting Services	10	986*
541620	Environmental Consulting Services	24	390*
541690	Other Scientific and Technical Consulting Services	16	1,049*
541890	Other Services Related to Advertising	0	17
541921	Photography Studios, Portrait	0	15
561621	Security Systems Services (except Locksmiths)	0	10
561720	Janitorial Services	1	173
561730	Landscaping Services	6	438

561790	Other Services to Buildings and Dwellings	2	44
562111	Solid Waste Collection	1	43
611430	Professional and Management Development Training	4	30
621111	Offices of Physicians (except Mental Health Specialists)	1	315
621910	Ambulance Services	0	37
621999	All Other Miscellaneous Ambulatory Health Care Services	1	13
722513	Limited-Service Restaurants	0	398
811111	General Automotive Repair	0	329
811212	Computer and Office Machine Repair and Maintenance	2	17
811310	Commercial and Industrial Machinery and Equipmt. Maintenance	0	50
		211	20,420

*Includes establishments from other states

The 211 ready, willing, and able DBE firms in the Vermont DBE Registry, divided by the 20,420 total Vermont firms from the County Business Patterns database (plus other states for selected codes), yields an unweighted base figure of 1.0%.

In order to better reflect the availability of DBE contractors with regard to potential spending, we recalculated the relative availability using a weighted approach, so that the NAICS codes with higher spending are weighted more heavily. This is appropriate, since the historical awards to DBEs are based directly on spending, rather than on relative availability.

The percentages of total spending represented by each of the NAICS categories, shown in the rightmost column of Table 1, were multiplied by the percent availability of DBE contractors for each NAICS code. The results of this calculation are shown below in Table 3.

Table 3. Weighted Average of DBE Availability

NAICS Code	Number of DBEs available to perform this work	Number of all firms available (including DBEs)	Pct Available		Weight	Weighted Availability
237310	24	726	3.3%	x	0.1%	0.00%
238110	2	65	3.1%	x	0.4%	0.01%
238130	1	53	1.9%	x	0.3%	0.01%
238150	1	12	8.3%	x	0.0%	0.00%
238160	2	78	2.6%	x	0.3%	0.01%
238190	2	11	18.2%	x	0.8%	0.14%
238210	8	271	3.0%	x	0.6%	0.02%
238220	3	302	1.0%	x	0.2%	0.00%
238290	3	21	14.3%	x	1.7%	0.25%
238310	2	69	2.9%	x	1.1%	0.03%
238320	5	153	3.3%	x	0.4%	0.01%
238350	0	99	0.0%	x	0.5%	0.00%
238390	2	13	15.4%	x	0.1%	0.01%

238910	17	324	5.2%	x	0.0%	0.00%
321992	0	8	0.0%	x	0.2%	0.00%
323111	1	44	2.3%	x	0.3%	0.01%
333921	0	-	0.0%	x	0.0%	0.00%
334220	0	-	0.0%	x	0.2%	0.00%
334310	0	-	0.0%	x	0.8%	0.00%
334519	0	3	0.0%	x	2.0%	0.00%
335129	0	1	0.0%	x	0.1%	0.00%
339950	1	11	9.1%	x	0.1%	0.01%
423110	0	13	0.0%	x	0.8%	0.00%
423430	2	14	14.3%	x	2.9%	0.42%
423820	0	30	0.0%	x	0.5%	0.00%
423830	0	41	0.0%	x	1.5%	0.00%
424320	0	9	0.0%	x	0.6%	0.00%
441310	0	102	0.0%	x	5.4%	0.00%
441320	0	46	0.0%	x	1.5%	0.00%
442110	0	58	0.0%	x	0.1%	0.00%
442210	0	33	0.0%	x	0.1%	0.00%
444110	0	17	0.0%	x	0.3%	0.00%
443141	0	33	0.0%	x	0.0%	0.00%
444130	0	79	0.0%	x	0.1%	0.00%
444190	4	116	3.4%	x	0.2%	0.01%
451212	0	1	0.0%	x	0.0%	0.00%
453210	0	19	0.0%	x	2.4%	0.00%
453220	0	76	0.0%	x	0.0%	0.00%
454210	0	6	0.0%	x	0.0%	0.00%
454310	0	110	0.0%	x	18.4%	0.00%
485310	0	13	0.0%	x	3.4%	0.00%
485991	1	6	16.7%	x	2.6%	0.43%
488410	1	18	5.6%	x	0.1%	0.00%
511110	0	42	0.0%	x	0.7%	0.00%
511210	1	29	3.4%	x	2.6%	0.09%
515112	0	22	0.0%	x	0.0%	0.00%
517110	0	105	0.0%	x	1.0%	0.00%
517210	0	20	0.0%	x	1.1%	0.00%
518210	3	34	8.8%	x	0.0%	0.00%
519130	0	21	0.0%	x	0.2%	0.00%
524126	0	41	0.0%	x	11.6%	0.00%
524128	0	1	0.0%	x	1.0%	0.00%
532420	0	1	0.0%	x	0.2%	0.00%
541110	1	423	0.2%	x	0.7%	0.00%

541211	3	143	2.1%	x	1.7%	0.04%
541310	4	78	5.1%	x	0.1%	0.01%
541430	7	78	9.0%		0.0%	0.00%
541512	16	5,559	0.3%		3.3%	0.01%
541611	26	6,365	0.4%		6.0%	0.02%
541613	10	986	1.0%		1.4%	0.01%
541620	24	390	6.2%		0.0%	0.00%
541690	16	1,049	1.5%		6.6%	0.10%
541890	0	17	0.0%		0.9%	0.00%
541921	0	15	0.0%		0.1%	0.00%
561621	0	10	0.0%		0.0%	0.00%
561720	1	173	0.6%		1.6%	0.01%
561730	6	438	1.4%		0.2%	0.00%
561790	2	44	4.5%		0.2%	0.01%
562111	1	43	2.3%		0.2%	0.00%
611430	4	30	13.3%		0.0%	0.00%
621111	1	315	0.3%		0.0%	0.00%
621910	0	37	0.0%		0.4%	0.00%
621999	1	13	7.7%		0.5%	0.04%
722513	0	398	0.0%		0.1%	0.00%
811111	0	329	0.0%		5.4%	0.00%
811212	2	17	11.8%		0.6%	0.07%
811310	0	50	0.0%		0.3%	0.00%

The weighted average DBE availability is the sum of the weighted availabilities in the rightmost column, which comes out to 1.79%. This is the step 1 base figure.

Step 2: Adjustment to Base Figure

As specified in Section 26.45, once the relative availability of ready, willing and able DBEs in our marketplace has been determined, it is necessary to examine additional evidence and, if appropriate, make adjustments to the base figure, to ensure that our goal truly and accurately reflects the level of DBE participation we would expect absent the effects of discrimination. Table 4 below shows the historical awards to DBE firms by year for the past five years. The annual percent to DBEs was calculated by adding together the semi-annual reports for each year, and then dividing the DBE contracting by the total contracting figure.

Table 4. Historical Contract Awards to DBE Firms

Year	Total Dollars	Total to DBEs	Percent to DBEs
FY 2013	\$1,124,191	\$84,764	7.54%
FY 2014	\$4,133,713	\$38,673	0.94%
FY 2015	\$6,121,708	\$41,955	0.69%
FY 2016	\$4,986,586	\$104,044	2.09%
		Median	1.52%

It can be seen in Table 4 that the State of Vermont overachieved in DBE contracting in FY2013, but has fallen short of the goal (2.25%) since then. The majority of DBE contract dollars in FY 2013 (\$57,309) went to one DBE firm that was conducting a statewide policy plan for public transportation as well as an intercity bus plan. Those plans were completed in FY 2014. The uptick in DBE spending in FY2016 represented a single contract worth \$65,000 to the same firm that did the statewide policy plan.

The shortfall analyses completed for FY14, FY15, and FY16 explained the reasons why the goals were not met in those years. VTrans and its subrecipients continue to make strong efforts to encourage eligible firms to register as DBEs in Vermont and to make use of such firms whenever possible.

The experience thus far in FY17 suggests that meeting the DBE goal will continue to be a challenge. VTrans thus chooses to average the weighted base figure with the median figure from the past four years to result in a goal of 1.65%.

VTrans considered several other potential adjustments to the base figure before concluding the analysis:

- **Disparity Studies:** There has been no known disparity study performed in Vermont, New Hampshire, or Maine for any public agency or private sector company.
- **Statistical Disparities in the Ability of DBEs to Get the Financing, Bonding, and Insurance Required to Participate in the VTrans DBE Program:** VTrans has not collected and analyzed this data related to transit contracts. VTrans offers training, mentoring, and one-on-one business coaching to its DBEs through the VTrans Business Development Program, and partners with the Small Business Administration and other agencies to promote accessible financing, bonding, and insurance to all certified DBEs. This has not been identified as a barrier to contracting and procurement opportunities for DBEs in Vermont.
- **Data on Employment, Self-Employment, Education, Training and Union Apprenticeship Programs, to the Extent They Relate to the Opportunities for DBEs to Perform in the VTrans DBE Program:** VTrans has not collected and analyzed this data related to transit contracts. Through the VTrans Business Development Program, DBEs are assessed for training needs, and VTrans funds DBE training to remove barriers, build capacity, and enhance critical business skills.

After full consideration of these factors, VTrans concludes that the adjusted weighted base figure of 1.65% is an appropriate goal for FY 2018 – 2020 for our FTA-assisted contracts.

Breakout of Estimated Race-Neutral and Race-Conscious Participation

VTrans will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. VTrans uses the following race-neutral means to increase DBE participation:

- Providing technical assistance and other services to DBEs, directly and via consultants, seminars, partnerships with technical assistance providers and academic institutions;
- Administering a business development program, the Vermont Business Development Program (VBDP), for certified DBEs that provides one-on-one business counseling and needs assessments, business and marketing plan development, and training and networking opportunities.
- Carrying out information and communications programs on contracting procedures and specific contract opportunities;
- Producing and distributing free How To Do Business with the Agency of Transportation Guide and other resource materials;
- Providing formal and informal training and presentations to DBEs and other contractors.
- Implementing a supportive services program to develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for DBEs;
- Providing frequent updates to our DBEs on all bidding and subcontracting opportunities;
- Conducting periodic user surveys and needs assessments to better determine DBE needs (e.g., training, financing, etc.) and to obtain better contact info;
- Producing and distributing an electronic newsletter that showcases successful DBEs, introduces new DBEs, provides a calendar of events, and many web links to contracting and business development resources.
- Ensuring distribution of our DBE Directory, through print and electronic means, to the widest feasible universe of potential prime contractors, including mail distribution to all potential prime bidders, and widespread distribution at conferences, expos, and seminars;
- Developing and delivering small business training and networking opportunities, including the annual Government Contracting Conference, the annual Women's Economic Opportunity Conference, matchmaker events, etc.;
- Assisting DBEs to develop their capability to utilize emerging technology and conduct business through electronic media, and utilizing our website to disseminate information, including our Directory, bid opportunities, updated information on Part 26, and useful links;

- Providing services to help DBEs improve long-term development, increase opportunities to participate in a variety of different kinds of work, handle increasingly significant projects, successfully compete as prime contractors, and achieve eventual self-sufficiency;
- Serving on the Advisory Council of the Vermont Women’s Business Center (VWBC), and supporting the VWBC’s mission through collaborative efforts and sponsorship of training programs;
- Providing assistance in overcoming limitations such as an inability to obtain bonding or financing, and identify and eliminate other barriers to contracting with the VT Agency of Transportation;
- Networking with local, state and federal agencies, non-profits, academic and business communities to obtain maximum partnering opportunities and resources, and develop comprehensive resource and referral network with technical assistance and service providers;
- Coordinating with other state DBE Liaison Officers, to ensure certification reciprocity and to maximize interstate contracting opportunities; and
- Assisting DBEs to establish prequalification status.

In addition to the above-described race-neutral means that VTrans already employs to increase DBE participation, we propose implementing and expanding our efforts in the following ways:

- Providing more one-on-one business counseling services to our DBEs;
- Ensuring that our prime contractors consider the use of DBEs in all possible work categories, by providing quick reference guides detailing the expertise and capacities of our DBEs;
- Providing frequent updates to our DBEs on all bidding and subcontracting opportunities; and
- Providing more effective outreach with minority businesses.

Breakout of Estimated Race-Neutral and Race-Conscious Participation: FTA-Assisted Contracting Program:

On our FTA-assisted contracts, VTrans estimates that we will meet our entire overall goal of 1.65% through race-neutral participation, and that we will not have to resort to race-conscious measures.

Since 1999, VTrans has administered a race and gender neutral DBE Program, and has not resorted to race-conscious measures, including project specific DBE goals. Therefore, all past participation by DBE prime contractors and subcontractors since 1999 has been race and gender neutral.

We will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual DBE participation and we 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:

- DBE participation through a prime contract a DBE obtains 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.
- DBE participation through a subcontract from a prime contractor that did not consider a firm's DBE status in making the award.