



COUNTY OF LEBANON TRANSIT AUTHORITY
DISADVANTAGED BUSINESS ENTERPRISE GOALS
FEDERAL FISCAL YEARS (FFY's) 2021, 2022 and 2023

Regulatory Mandate

Recipients of Federal Transit Administration (FTA) funds are required to submit triennial overall goals for Disadvantaged Business Enterprise (DBE) participation using the 2 Step Goal Setting Process set forth in Section 26.45 Part 26. The DBE Goal Setting Process requires the following:

- The establishment of a base figure for the relative availability of DBE's market;
- Describing the evidence with which it was calculated;
- Adjusting that figure to make it as precise as possible where appropriate; and
- Describing the evidence relied upon for such adjustments.

Overall Goal

The County of Lebanon Transit Authority, referred to as Lebanon Transit, has developed its DBE Goal and Goal Setting Methodology in accordance with the Federal regulatory mandate set forth in Title 49 Code of Federal Regulations Part 26.

Lebanon Transit's Overall Goal for participation by DBEs in Federal Fiscal Years (FFY's) 2021, 2022 and 2023 will be 1.0% of Federal Financial Assistance to be expended on DOT-assisted contracts. The Goal will be made through Race-Neutral measures. This Goal is exclusive of FTA funds used for the purchase of transit vehicles.

Lebanon Transit expects to award at least \$6,131.00 out of \$605,525.00 to DBE's in each of the next three (3) years to achieve its Goal of 1.0%.

Method for Determining the Goal Step 1

Step 1 calls for the calculation of a base figure reflecting the relative availability of DBE's who are ready, willing and able to perform work on FTA's DOT-Assisted projects.

First, Lebanon Transit identified the contracting opportunities expected to award in FFY's 2021, 2022 and 2023 by listing each projected opportunity by the North American Industry Classification System

(NAICS) Code, the type of business, the number of all firms available to perform the work, the number of DBE firms available to perform the work and the dollar value of FTA DOT-Assisted Funds for each project.

Next, Lebanon Transit gathered information on Certified DBE’s from the PA UCP Website located at <https://www.dotsbe.pa.gov/PAUCPWeb/paucp/viewHome.do>. From the PA UCP Home Page, Lebanon Transit searched the following Pennsylvania Counties; Berks, Dauphin, Lancaster, Lebanon and Schuylkill for a list of available DBE’s to perform the type of work by NAICS expected to be awarded during the covered years.

Next, Lebanon Transit gathered information on all firms from the County Business Patterns Website located at <https://www.census.gov/programs-surveys/cbp.html>. From the Home Page, Lebanon Transit searched the 2017 County Tables and sorted the data by the following Pennsylvania Counties; Berks, Dauphin, Lancaster, Lebanon and Schuylkill for a list of all firms by NAICS expected to be awarded during the covered years.

The following Graph is a list of Lebanon Transit’s contracting opportunities over the next three (3) years.

NAICS	TYPE OF BUSINESS	CONTRACTING OPPORTUNITY	NUMBER OF ALL FIRMS AVAILABLE (INCLUDING DBE'S)	NUMBER OF DBE FIRMS AVAILABLE	RELATIVE AVAILABILITY OF DBE'S	THREE (3) YEAR BUDGET 2021-2023	DBE DOLLARS	WEIGHT	WEIGHTED BASE FIGURE (I*F)
424720	WHOLESALE TRADE	FUEL	26	0	0.0000	260,000.00	\$ -	0.4294	0.0000
441310	RETAIL TRADE	PARTS	330	1	0.0030	150,000.00	\$ 454.55	0.2477	0.0008
441320	RETAIL TRADE	TIRES/TUBES	128	0	0.0000	30,000.00	\$ -	0.0495	0.0000
453210	RETAIL TRADE	OFFICE SUPPLIES/STATIONARY	34	4	0.1176	15,000.00	\$ 1,764.71	0.0248	0.0029
517311	INFORMATION	WIRED COMM.	229	0	0.0000	15,000.00	\$ -	0.0248	0.0000
517312	INFORMATION	WIRELESS COMM.	180	0	0.0000	15,000.00	\$ -	0.0248	0.0000
518210	INFORMATION	WEBHOSTING	59	2	0.0339	18,300.00	\$ 620.34	0.0302	0.0010
541214	PROFESSIONAL, SCIENTIFIC, TECHNICAL	PAYROLL SERVICES	15	0	0.0000	7,500.00	\$ -	0.0124	0.0000
541519	PROFESSIONAL, SCIENTIFIC, TECHNICAL	ITS	58	5	0.0862	20,250.00	\$ 1,745.69	0.0334	0.0029
541613	PROFESSIONAL, SCIENTIFIC, TECHNICAL	MARKETING JANITORIAL SERVICES/LANDSCAPING	156	4	0.0256	52,500.00	\$ 1,346.15	0.0867	0.0022
561720	ADMINISTRATIVE AND SUPPORT	SECURITY SYSTEMS SERVICES	1722	2	0.0012	14,475.00	\$ 16.81	0.0239	0.0000
561621	ADMINISTRATIVE AND SUPPORT	SERVICES	41	1	0.0244	7,500.00	\$ 182.93	0.0124	0.0003
			2978	19	0.64%	605,525.00	6,131.17	100.00%	1.01%

Next, Lebanon Transit determined the weight of each type of work using the six (6) digit North American Industry Classification System (NAICS) Codes by projecting the dollar value of potential contracting opportunities Lebanon Transit expects to award during FFY’s 2021, 2022 and 2023.

Lebanon Transit used the information that was gathered from the PA UCP and the 2017 County Business Patterns by NAICS Codes from the following Pennsylvania Counties; Lebanon, Berks, Lancaster, Dauphin, and Schuylkill to determine the weight and relative availability of DBE’s.

The base figure is calculated by first identifying the number of DBE’s in the appropriate business categories (NAICS) that Lebanon Transit could potentially contract with for goods and/or services. That number was then divided by the total number of businesses in those same business categories found in

the 2017 County Business Patterns in the same Pennsylvania Counties; Lebanon, Berks, Lancaster, Dauphin and Schuylkill.

Lebanon Transit identified nineteen (19) DBE firms out of two-thousand nine-hundred and seventy-eight (2,978) firms for a Base Goal of 0.64%.

BASE FIGURE			
READY, WILLING, AND ABLE DBE'S		19	0.64%
ALL FIRMS, READY, WILLING, AND ABLE (INCLUDING DBE'S AND NON-DBE'S)		2,978	

Next, Lebanon Transit weighted the ratio by the projected expenditures within each of the NAICS Codes to determine the relative availability of DBE's. This ensures that the Step 1 base figure is as accurate as possible.

Step 1A consists of determining the weight of each type of work by NAICS Code by listing all proposed projects and or contracting opportunities and the dollar value Lebanon Transit expects to award.

Chart for Step 1A

Base Figure	STEP 1A: DETERMINE THE WEIGHT OF EACH TYPE OF WORK BY NAICS CODE			
***Enter all FTA-assisted projects below. Project amounts should be assigned relevant NAICS Codes.				
	NAICS	PROJECT	AMOUNT OF DOT FUNDS ON PROJECT	WEIGHT
1	424720	FUEL	260,000.00	0.4294
2	441310	PARTS	150,000.00	0.2477
3	441320	TIRES/TUBES	30,000.00	0.0495
4	453210	OFFICE SUPPLIES/STATIONARY	15,000.00	0.0248
5	517311	WIRED COMM.	15,000.00	0.0248
6	517312	WIRLESS COMM.	15,000.00	0.0248
7	518210	WEBHOSTING	18,300.00	0.0302
8	541214	PAYROLL SERVICES	7,500.00	0.0124
9	541519	ITS	20,250.00	0.0334
10	541613	MARKETING	52,500.00	0.0867
11	561720	JANITORIAL SERVICES/LANDSCAPING	14,475.00	0.0239
12	561621	SECURITY SYSTEMS SERVICES	7,500.00	0.0124
TOTAL FTA-ASSISTED CONTRACT FUNDS			605,525.00	1.00

Step 1B consists of determining the relative availability of DBE's listing contracting opportunities by NAICS and dividing the total number of DBE's by total number of all firms including DBE's.

Chart for Step 1B

STEP 1B: Determine the relative availability of DBE's by NAICS Code					
***Use DBE	NAICS	CONTRACTING OPPORTUNITY	Number of all firms available (including DBE's)	Number of DBE's available to perform this work	RELATIVE AVAILABILITY OF DBE'S
1	424720	FUEL	26	0	0.00%
2	441310	PARTS	330	1	0.30%
3	441320	TIRES/TUBES	128	0	0.00%
4	453210	OFFICE SUPPLIES/STATIONARY	34	4	11.76%
5	517311	WIRED COMM.	229	0	0.00%
6	517312	WIRLESS COMM.	180	0	0.00%
7	518210	WEBHOSTING	59	2	3.39%
8	541214	PAYROLL SERVICES	15	0	0.00%
9	541519	ITS	58	5	8.62%
10	541613	MARKETING	156	4	2.56%
11	561720	JANITORIAL SERVICES/LANDSCAPING	1722	2	0.12%
12	561621	SECURITY SYSTEMS SERVICES	41	1	2.44%
			2978	19	0.64%

Step 1C consists of weighting the base figure by multiplying Step 1A weight by Step 1B relative availability.

Chart for Step 1C

1C: (Weight) X (Availability) = Weighted Base Figure						
NAICS	CONTRACTING OPPORTUNITY	WEIGHT	X	RELATIVE AVAILABILITY OF DBE'S	WEIGHTED BASE FIGURE (E*G)	
1	424720 FUEL	0.4294	x	0.0000	0.0000	
2	441310 PARTS	0.2477	x	0.0030	0.0008	
3	441320 TIRES/TUBES	0.0495	x	0.0000	0.0000	
4	453210 OFFICE SUPPLIES/STATIONARY	0.0248	x	0.1176	0.0029	
5	517311 WIRED COMM.	0.0248	x	0.0000	0.0000	
6	517312 WIRLESS COMM.	0.0248	x	0.0000	0.0000	
7	518210 WEBHOSTING	0.0302	x	0.0339	0.0010	
8	541214 PAYROLL SERVICES	0.0124	x	0.0000	0.0000	
9	541519 ITS	0.0334	x	0.0862	0.0029	
10	541613 MARKETING	0.0867	x	0.0256	0.0022	
11	561720 JANITORIAL SERVICES/LANDSCAPING	0.0239	x	0.0012	0.0000	
12	561621 SECURITY SYSTEMS SERVICES	0.0124	x	0.0244	0.0003	
TOTAL					0.0101	
Expressed as a % (*100)					1.01%	

The base figure from Step 1 and Step 1A was adjusted by using the weighting system in Step 1, 1C to enforce the reliability of the statistical data provided. As a result, Lebanon Transit's DBE Goal for FFY's 2021, 2022 and 2023 will be 1.0%.

Method for Determining the Goal Step 2

Step 2 requires you examine all evidence available to determine if an adjustment to the base figure is needed. If the evidence does not suggest an adjustment is necessary, then an adjustment is not required. Step 2 of the Goal Setting process is intended to adjust the Step 1 base figure to make the Goal as precise as possible.

Lebanon Transit reviewed past participation to adjust the Step 1 Goal and reviewed the median annual attainment from the last three (3) years. Lebanon Transit used the last three (3) years due to the fact no Federal funding was used in Fiscal Years 2016/2017 and 2017/2018. Lebanon Transit also reviewed the types of awards that were made during those Fiscal Years to see if they were similar in nature to the awards expected to be made in FFY's 2021, 2022 and 2023.

Lebanon Transit's past participation in 2017 was 0.0% Federal; 2018 was 4.0% Federal; 2019 was 1.15% Federal. Historical median is 1.15%, with the base figure of 1.01%, the sum of which is 2.16%. The adjusted base figure equates to 1.08%.

Chart for Reviewing Past Participation

STEP 2: ADJUST BASE FIGURE					
PAST PARTICIPATION			HISTORICAL MEDIAN		
2017	0.00%		0.00%	1.15%	4.00%
2018	4.00%				
2019	1.15%				
		HISTORICAL MEDIAN	1.15%		
		BASE FIGURE	1.01%		
		SUM	2.16%		
		DBE GOAL	1.08%		

Lebanon Transit has not identified any disparity studies conducted in its service area that would be helpful in considering an adjustment to the Step 1 base figure.

Lebanon Transit determined the adjustment made in Step 2 to the base Goal calculated in Step 1 will not be necessary as they are very similar to each other, with rounding they equate to the same value.

Lebanon Transit also reviewed the history of procurements for goods and/or services. In FFY 2018, a 4.0% DBE participation was reached due to a Signs and Shelters Project, as well as the use of a DBE for marketing services. Since 2018, Lebanon Transit hired a full-time marketing staff member. As a result, Lebanon Transit has determined its DBE Goal for FFY's 2021, 2022 and 2023 will be 1.0% using the weighted method in Step 1C above.

Lebanon Transit will be utilizing a Race-Neutral approach to attain its DBE Goal.

Additional Notes:

- Pennsylvania State Capitol in Harrisburg is located 30 miles West;
- Lebanon County is a small urban County with the highest population in the City of Lebanon; and
- Based on 2018 Quick Facts and 2017 American Fact Finder Census Data, the total minority population in Lebanon County is 9.50%.

Breakout of Estimated Race-Neutral and Race-Conscious Participation

Lebanon Transit will meet the feasible portion of its overall Goal by using Race-Neutral means of facilitating DBE participation. The following Race-Neutral means will be used;

- Encouraging prime contractors to subcontract portions of the work when feasible;
- Arranging solicitations, time to present bid/proposals, big quantities, specifications, quantities and deliver schedules to facilitate DBE and small business participation where feasible;
- Simplifying or reducing bonding requirements where feasible;
- Providing information to bidders of potential subcontractors where feasible; and
- Offering instructions on bid specifications, procedures and general bidding requirements.

Lebanon Transit anticipates meeting its overall Goal of 1.0% by Race-Neutral means. This determination is based on the amount of DBE participation in the DOT-Assisted contracts during prior fiscal years without establishing goals for specific contracts, as well as potential DBE contracts to pull opportunities when considering the projected operating and capital expenditures. As the fiscal year progresses and DBE participation is monitored, Lebanon Transit will consider a Race-Conscious Goal for specific contracts, if warranted, to achieve its overall Goal.

Lebanon Transit will use contract goals to meet any portion of the overall Goal that it does not project being able to meet using Race-Neutral means when feasible. Contract goals are established so that over the period to which the overall goal applies, that will cumulatively result in meeting any portion of our overall Goal that is not projected to be met through the use of Race-Neutral means.

Contract goals will be expressed as a percentage of the total amount of DOT-Assisted contracts.

Lebanon Transit will establish contract goals only on those DOT-Assisted contracts that have subcontracting possibilities and will not establish a goal on every such contract. In addition, the size of the contract goals will be adapted to the circumstances of each such contract i.e., type and location of work, availability of DBE's to perform this particular type of work.

Lebanon Transit will adhere to the following procedures in situations where there are contract goals:

- When a contract goal is established, Lebanon Transit will award the contract only to the bidder who makes a good faith effort to meet that goal;
- These efforts shall consist of documenting participation in the contract for DBE firms that meet the goal or documenting that they have taken all necessary and reasonable steps to achieve the DBE goal.

Transit Vehicle Manufacturers

Lebanon Transit requires each transit vehicle manufacturer, as a condition of being authorized to bid on Federal Transit Administration, DOT-Assisted transit vehicle procurements, to certify that they have complied with the requirements of this Section.

Process

Lebanon Transit reviews updates to the PA UCP Directory at least annually and will consider resetting its annual Goal based on the potential that may arise because of changes to the DBE Directory.

In the case of construction contracts, Lebanon Transit will post the procurements with appropriate entities listed in the DBE Directory organized to represent or advance the interests of Disadvantage Business Enterprises.

The Disadvantaged Business Enterprise Liaison Officer (DBELO) met and continues to meet with the Executive Director, Maintenance/Operations Manager as well as the Procurement/Human Resources Manager to review upcoming projects and/or purchases based on the approved budget at least annually. Discussions also occur during monthly staff meetings as projects and service needs arise. Most recently, in February 2020, when seeking janitorial quotes.

Lebanon Transit holds Quarterly Advisory Committee meetings, encouraging community organizations, minority and women's groups as well as other officials of organizations to attend. To date no entity or organization relative to DBE's has attended. The following is a list of attendees over the past two (2) years:

- Lebanon City Mayor;
- Lebanon County Housing Authority;
- Lebanon County Planning Department;
- Lebanon Transit Patrons;
- Aide to State Rep. Russ Diamond;
- Harrisburg Area Community College (HACC) – Lebanon Campus;
- Lebanon VA Medical Center;
- United Way of Lebanon County;
- Vision Corps;
- Lebanon Expo Center; and
- Community Services Group.

When seeking quotes for services, Lebanon Transit reviews DBE's listed on the PA UCP Website.

Public Notice and Public Comment

Lebanon Transit issued a Public Notice of the proposed Overall Goal (see attached) on Friday, June 5, 2020. The Public Notice was posted on the following:

- Lebanon Daily News;
- Lebanon Transit Website, www.lebanontransit.org, link to DBE Proposed Goals, click on News and Events, scroll down to Public Notice DBE, click to read more;
- Lebanon Transit Facebook Page, link to LT Website for link to DBE Proposed Goals.

The Public Notice informs the public of the Proposed Goal and the rationale used to calculate the Goal and was available for inspection for forty-five (45) days, during normal business hours, 8 A.M. to 4 P.M., prevailing time, Monday through Friday, at Lebanon Transit's Principal Office located at 200 Willow St., Lebanon, PA 17046.

Lebanon Transit accepts comments by mail, email and telephone for those wishing to provide input but are unable to attend the Public Hearing. The Public Notice included addresses to which comments may be sent and addresses (including offices and websites) where the Proposed Goals may be viewed.

Lebanon Transit accepted comments on the Proposed Goals for forty-five (45) days from the date of the Public Notice. To date, no comments have been received.

A Public Meeting was held on Monday, July 20, 2020 at 4:00 P.M., prevailing time, for input and comment on the Lebanon Transit Proposed Overall Goal; there was no public attendance. A brief review of the Program and the steps used to develop the Goal Methodology were offered to the Lebanon Transit staff who attended with no comments added.

Following the Public Comment period, Lebanon Transit will review all comments received and incorporate any relevant portions in the final Goal submitted to FTA.

To date, no comments have been received.

Lebanon Transit's DBE Goals for FFY's 2021, 2022 and 2023 were approved by the Lebanon Transit Board of Directors on July 22, 2020.

Lebanon Transit will use its Overall Goal on October 1 of each year, unless we receive other instructions from DOT and/or, if the Goal is established on a project basis, by the time of the first solicitation for a DOT-Assisted contract for the project.