



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 | 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

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.

Public Outreach/Consultation Process

Public Outreach

Lebanon Transit's is engaged in public outreach by seeking input from community organizations, minority and women's groups as well as other local official organizations throughout Lebanon County by attending our Quarterly Advisory Committee Meetings. Discussions are held in part on the following:

- Lebanon Transit rules and regulations;
- Attaining/retaining operators and employees;
- Route changes, modifications and additions;
- Ridership statistics;
- Civil Rights, Title VI, ADA, DBE;
- Community services, meetings and partnerships;
- Short and long range goals;
- Action plans;
- Procurement opportunities; and
- Capital projects and purchasing plans.

These meetings are a vital component of how information is gathered from the community. Input received from our stakeholders is essential to ensure Lebanon Transit continues to operate efficiently and creates equal opportunities for both DBE and minority communities. Lebanon Transit sends email blasts with date and time of the Committee meetings to all organizations.

The last Lebanon Transit Quarterly Outreach Meeting was held on January 14, 2020. Although Lebanon Transit has had little to no response in receiving input from DBE or minority related organizations by attending our meetings, we continue to reach out by actively participating in events throughout the community and taking the input from the community organizations and members that do participate in the meetings.

Participating in community events is a huge part of allowing residents and organizations familiar with our services and what we have to offer. We have participated in the following events seeking community awareness:

- The Latin Festival;

- National Night Out;
- Salvation Army Kids Camps;
- Community Night at the Fair;
- 50+ Festivals;
- Job Fairs with Walmart, Hershey Entertainment, distribution plants and PA Career Link;
- Car and Motorcycle Shows;
- Presentations at the senior complexes; and
- Hospitals and School Districts just to name a few.

Most recently, in February 2020, Procurement personnel called several DBE's from the PA UCP Directory and left multiple documented messages to discuss upcoming potential participation for Janitorial services.

Consultation Process

Consultation was held on July 20, 2020 at 4:00 P.M. to discuss Lebanon Transit's final FY's 2021-22-23 DBE Overall Goal. Lebanon Transit reached out for public participation by the following means:

- Lebanon Daily News- Approximately 4,383 daily subscribers;
- Lebanon Transit Website- Approximately 124 people viewed the proposed Overall DBE Goal; and
- Lebanon Transit Facebook Page- Approximately 181 people viewed the proposed Overall DBE Goal.

The Public Notice informed all interested parties they could participate by phone, e-mail or in person. Lebanon Transit was able to provide social distancing by using available space in the garage as well as providing masks to anyone who attended.

Handouts were made available as well as the Sign-In Sheet of those in attendance. The Sign-in Sheet is kept on file.

There was no public participation. The Lebanon Transit Overall Goal of 1% remained the same.

Other Processes

Lebanon Transit reviews updates to the PA UCP Directory at least annually and considers resetting its annual Goal based on any opportunities that may arise due to any changes to the DBE Directory. When seeking quotes for services, Lebanon Transit reviews DBE's listed on the PA UCP Website.

In the case of construction contracts/agreements, Lebanon Transit posts the procurements with appropriate entities listed in the DBE Directory organized to represent or advance the interests of DBE's.

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 the Quarterly Advisory Committee meetings when warranted and the monthly Board and staff meetings as projects and service needs arise.

Lebanon Transit will continue to hold its 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, email blasts are sent at least two (2) weeks prior to the meeting allowing ample time for awareness. 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;
- State Representatives;
- 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.

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 reviews all comments received and incorporates any relevant portions in the final Goal submitted to FTA.

To date, no comments have been received with respect to the published goals and methodology.

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.