



**Disadvantaged Business Enterprise (DBE)
Program Goal & Methodology
FYs 2022-2024**

Introduction:

Franklin Transit provides two types of service. The first service is a fixed-route system, which maintains a consistent schedule and route. The fixed routes serve the areas of the City of Franklin and Cool Springs. There are two fixed routes: Red Route to historic downtown Franklin and Blue Route to Cool Springs.

The second service offered is transportation on demand, known as Transit-on-Demand (TODD), which picks up passengers unable to meet the fixed routes at their home and transfers them to locations within the city. TODD is available throughout the City of Franklin, including the Cool Springs area.

The Franklin Transit Authority (FRTA) receives over \$250,000 in federal financial assistance from FTA and has signed an assurance it will comply with 49CFR, Part 26. Therefore, FRTA has established a DBE program and submitted its FY2022-2024 goal to FTA for review and approval.

Summary:

The Franklin Transit Authority has established its Disadvantaged Business Enterprise (DBE) goal for Federal Fiscal Years 2022-2024 to be three and nine-tenths percent (3.9%) of the federal financial assistance Franklin Transit will expend in DOT-assisted contracts, exclusive of Federal Transit Administration funds to be used for the purchase of transit vehicles. This goal will be achieved through 100% race-neutral measures. The goal was determined by reviewing the percentage of the revenue spent in fiscal years 2018-2020, the percentage charged to FTA dollars, the availability of DBEs in each purchasing category, the tentative three-year budget, and, finally, the prorated consideration of the anticipated purchases for fiscal years 2022-2024.

Information Sources:

Franklin Transit Authority reviewed a variety of data sources in order to develop its DBE Goal:

- Prior procurement and project records and DBE reports
- U. S. Bureau of the Census
- North American Industrial Classification System (NAICS) Codes
- Tennessee Uniform Certification Program (TNUCP) Disadvantaged Business Enterprise (DBE) Directory

Goal Methodology:

Our goal methodology is based on specific projects and contracts that Franklin Transit is going to award and the DBE availability in our area. There are plans for a small construction project, installing thirteen new bus shelters within the service area over the next three years. Since there aren't any large construction or capital contracts, Franklin Transit also reviewed its operating contracts.

The Federal Fiscal Years 2022-2024 goal was established as follows:

Franklin Transit followed USDOT guidance, considering all certified DBEs to be Ready, Willing, and Able (RWA) based upon whether or not the business appears in the state's DBE Directory/ Unified Certification Program.

Step 1: Developing a base figure for the relative availability of DBEs

In looking at contracting opportunities for Franklin Transit Authority, there are very few over the next three years that is anticipated. Most capital funds are expended on bus purchases, which are on a state contract, preventive maintenance, and capital cost of 3rd party contracting. As of FY2022, Franklin Transit plans to install thirteen new bus shelters over the next few years. Another potential project is expanding technology components to the service. There are no large projects planned currently.

However, Franklin Transit Authority can potentially utilize DBEs depicted in the chart below based on the search for registered DBEs by NAICS codes in the Tennessee Uniform Certification Program for daily or ongoing needs.

The Local Market Area was determined to be Nashville-Davidson County, Maury County, Williamson County and Rutherford County; these include the majority of contractors (and subcontractors) with the area beyond being primarily rural. According to the 2019 United States Census data (County Business Patterns), there are 2,786 RWA firms in the statistical area of Nashville-Davidson County, Maury County, Williamson County and Rutherford County, Tennessee, in which DOT funding could be spent by Franklin Transit.

68 businesses in Nashville-Davidson County, Maury County, Williamson County and Rutherford County, Tennessee, are certified as DBEs with the Tennessee Department of Transportation's Small Business Development Office.

NAICS Code	Anticipated FTA Funds FY 22-24	RWA DBEs (Region 3)	All RWA Firms*	Base Figure
238110 (Poured Concrete Foundation and Structure Contractors) 238910 (Site Preparation Contractors)	\$ 568,000.00	20	216	
238210 (Electrical Contractors)	\$ 1,884.00	8	266	
238220 (Plumbing, Heating, and Air-Conditioning Contractors)	\$ 25,368.00	4	333	
32311 (Printing)	\$ 26,454.00	1	92	
45431 (Fuel Dealers)	\$ 265,923.00	0	7	
518210 (Data Processing, Hosting, and Related Services)	\$ 258,000.00	1	118	
524210 (Insurance Agencies and Brokerages)	\$ 480,000.00	4	652	
541211 (Offices of Certified Public Accountants)	\$ 48,000.00	4	210	
5418 (Advertising and Related Services) 54180 (Advertising Agencies)	\$ 127,500.00	5	71	
541930 (Translation and Interpretation Services)	\$ 60.00	0	3	
561621 (Security Systems Services (except Locksmiths))	\$ 135,000.00	2	32	
561622 (Locksmiths)	\$ 714.00	0	12	
561710 (Exterminating and Pest Control Services)	\$ 1,860.00	0	71	
561720 (Janitorial Services)	\$ 15,111.00	19	316	
81111 (Automotive Mechanical and Electrical Repair and Maintenance) 441310 (Automotive Parts and Accessories Stores)	\$ 654,000.00	0	387	
Base Figure		68	2786	0.024407753
* Data based upon 2019 County Business Patterns, United States Census Bureau				

68 DBE firms/ 2,786 All RWA (DBE and non-DBE) firms = 0.024%

In order to ensure that our DBE program will be narrowly tailored to overcome the effects of discrimination, if we use contract goals, 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 DBE goal; DBE participation on a prime contract exceeding a contract goal; and DBE participation through a subcontract from a prime contractor that did not consider a firm's DBE status in making the award.

We will maintain data separately on DBE achievements in those contracts with and without contract goals, respectively.

Step 2: Adjusting the Base Figure

Franklin Transit has examined all evidence available to determine if an adjustment to the base figure is needed. Expected contracting opportunities in the upcoming three years are substantially similar to the previous three years. Previous participation included all prime contractors; no subcontractors were used. The historical median DBE participation over the previous three years is 7.5% calculated as follows:

Participation:

2018—8.57%

2019 – 4.50%

2020 – 7.50%

This number averaged with our step 1 base figure of .024% would make our DBE goal 3.87%. Therefore, the DBE goal for Franklin Transit for FYs 22-24 is 3.9%. This goal will be reached using race neutral means of facilitating DBE participation.

FRTA's DBE goals are currently being achieved through 100% race-neutral measures and we expect to continue to meet our goal through 100% race-neutral measures.

Attachments that support the above methodology include:

- Past three-year DBE Participation Data
- Spreadsheet detailing number of RWA firms by NAICS Code

Public Participation and Facilitation

In accordance with Public Participation Regulatory Requirements of Title 49 CFR Part 26, minority, women, local business associations, and community organizations within the Franklin Transit area were consulted and provided an opportunity to review the triennial goal analysis and provide input.

Franklin Transit issued a Public Notice on its website and the *Williamson Herald* (Attachment 1) publishing the Draft Proposed DBE Goal-Setting Methodology for FFY 2022- 2024.

Franklin Transit's proposed goal and its rationale are available for inspection for twenty-one (21) days following the date of this Notice, between 8:00am-5:00pm, Monday through Friday at the Transit Center:

Franklin Transit Authority
708 Columbia Avenue
Franklin, TN 37064
Phone: 615-628-0270
spatel@tmagroup.org
Contact: Sharmila Patel, DBE Liaison Officer

Local area businesses, organizations, and individuals who may have information concerning the availability of disadvantaged and non-disadvantaged businesses are invited to a meeting held on September 15, 2021, at the Franklin Transit Authority.