

**ATTACHMENT 5**

Section 26.45: Overall DBE Three-Year Goal Methodology

**Name of Recipient:** The International Falls-Koochiching Co. Airport Commission

**Goal Period:** FY 2019-2020-2021 – October 1, 2018 through September 30, 2021

<b>DOT-assisted contract amount:</b>	FY-2019	\$13,585,000.
	FY-2020	\$15,960,000.
	FY-2021	\$ 4,180,000.
<b>Total</b>		<b>\$33,725,000.</b>

**Overall Three-Year Goal:** 4.1%, to be accomplished through 4.1% RC and 0.0% RN

**Total dollar amount to be expended on DBE's:** \$1,364,960.

**Describe the Number and Type of Projects that the airport anticipates awarding:**

Projects Fiscal Year #1

1. Taxiway A, Phase 2
- 2.

Projects Fiscal Year #2

1. Runway 13/31 Reconstruction, Phase 3
- 2.

Projects Fiscal Year #3

1. Runway 13/31 Reconstruction, Phase 4
- 2.

**Market Area:**

**Step 1. Analysis:** Actual relative availability of DBE's

Method: Use DBE Directory - <http://mnucp.metc.state.mn.us/Default.aspx>

and Census Bureau Data <http://www.census.gov/econ/cbp/index.html>

*[For each project and each fiscal year, please provide the following information]*

NAICS	Type of Work	Total DBE's	Total All Firms
<b>Total</b>			

Divide the total number of DBE's by the total number of All Firms = base figure for each project.

To determine the overall base figure for more than one project, add all the project percentages together.

**Step 2. Analysis:** Adjustments to Step 1 base figure.

After calculating a base figure of the relative availability of DBEs, evidence was examined to determine what adjustment (if any) was needed to the base figure in order to arrive at the overall goal.

An examination of the anticipated projects for each fiscal year, the availability of the DBE firms by trade classification and the volume of work performed by DBE firms over previous years.

**Fiscal Year #1**

For FY-2019, we anticipate the award of the following:

A	B	C	D	E	F	G	H	I
Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	Census	Directory	DBE (%) (= G/F)	DBE (\$) (= E x H)
Taxiway A	Hwy. & Street Constr.	Hwy. & Street Constr.	137310	\$12,730,000.	296	12	4.0%	\$509,200.
	Engineering Services	Engineering Services	541330	\$855,000.	917	44	4.8%	\$41,040.
<b>Total FY-2019</b>				\$13,585,000.				\$550,240.

**Fiscal Year #2**

For FY-2020, we anticipate the award of the following:

A	B	C	D	E	F	G	H	I
Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	Census	Directory	DBE (%) (= G/F)	DBE (\$) (= E x H)
Rwy 13/31 Ph. 3	Hwy. & Street Constr.	Hwy. & Street Constr.	137310	\$15,105,000.	296	12	4.0%	\$604,200.
	Engineering Services	Engineering Services	541330	\$855,000.	917	44	4.8%	\$41,040.
<b>Total FY-2020</b>				\$15,960,000.				\$645,240.

**Fiscal Year #3**

For FY-2021, we anticipate the award of the following:

A	B	C	D	E	F	G	H	I
Project Name	Trade Description	NAICS Description	NAICS	Trade (\$)	Census	Directory	DBE (%) (= G/F)	DBE (\$) (= E x H)
Rwy 13/31 Ph. 4	Hwy. & Street Constr.	Hwy. & Street Constr.	137310	\$3,895,000.	296	12	4.0%	\$155,800.
	Engineering Services	Engineering Services	541330	\$285,000.	917	44	4.8%	\$13,680.
<b>Total FY-2021</b>				\$4,180,000.				\$169,480.

**Past History Participation**

Other data used to determine the adjustment to the base figure was the median of historical DBE accomplishments.

The proposed Overall DBE Goals are as follows:

- Fiscal Year #1 – 4.1%
- Fiscal Year #2 – 4.0%
- Fiscal Year #3 – 4.1%

Our proposed overall three year goal will be reflected as an average of the three years.

The history of accomplishments at the airport has been less than 3%, therefore, the Airport Commission is adopting its Step 1 base figure as its overall goal for this three-year goal period.

**Breakout of Estimated “Race and Gender Neutral” (RN) and “Race and Gender Conscious” (RC) Participation.**

26.51(b) (1-9)

The recipient will meet the maximum feasible portion of its overall goal by using RN means of facilitating DBE participation.

1. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitates DBE, and other small businesses, participation;
2. Informing any interested parties that MnDOT has information and communications programs on contracting procedures and specific contract opportunities;
3. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors.

The recipient estimates that in meeting its overall goal 4.1%, it will obtain 0.0% from RN participation and 4.1% through RC measures.

This breakout is based on:

- The Airport Commission does not have a history of over-achievement of goals and expects to obtain its DBE participation through the use of DBE contract goals or a conscious effort to obtain DBE participation. Therefore, we are applying the entire goal of 4.1% to race-conscious participation.

The Commission will adjust the estimated breakout of RN and RC DBE participation as needed to reflect actual DBE participation (see Section 26.51(f)) and track and report RN and RC participation separately. For reporting purposes, RN DBE participation includes, but is not necessarily limited to, the following: DBE participation through a prime contract obtained 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 and DBE participation through a subcontract from a prime contractor that did not consider a firm's DBE status in making the award.

## PUBLIC PARTICIPATION

**Consultation:** Section 26.45(g)(1).

In establishing the overall goal, the Airport Authority will provide for consultation and publication. This includes consultation with minority, women's and general contractor groups, community organizations, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Airport Authority's efforts to establish a level playing field for the participation of DBEs. The consultation will include a scheduled, direct, interactive exchange (e.g., a face-to-face meeting, video conference, teleconference) with as many interested stakeholders as possible focused on obtaining information relevant to the Airport Authority's goal setting process, and it will occur before we are required to submit our goal methodology to the operating administration for review pursuant to paragraph (f) of this section. We will document in our goal submission the consultation process that we engaged in. Notwithstanding paragraph (f)(4) of this section, we will not implement our proposed goal until we have complied with this requirement.

The Airport Commission submits its overall DBE three-year goal to DOT on August 1 as required by the set schedule.

Before establishing the overall goal, the Airport Commission will consult with the International Falls Chamber of Commerce to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the Commission's efforts to establish a level playing field for the participation of DBEs.

Following the consultation, we will publish a notice in the Daily Journal of the proposed overall goal, informing the public that the proposed goal and its rationale are available for inspection during normal business hours at the airport administration building for 30 days following the date of the notice, and

informing the public that the Airport Commission and DOT will accept comments on the goals for 45 days from the date of the notice

Our overall goal submission to DOT will include a summary of information and comments received during this public participation process and our responses, if any.

No comments have been received.

### **Contract Goals**

The Commission will use contract goals to meet any portion of the overall goal that the recipient does not project being able to meet using RN means. Contract goals are established so that, over the period to which the overall goal applies, they will cumulatively result in meeting any portion of the recipient's overall goal that is not projected to be met through the use of RN means.

The Commission will establish contract goals only on those DOT-assisted contracts that have subcontracting possibilities. It need not establish a contract goal on every such contract, and the size of the contract goals will be adapted to the circumstances of each such contract (e.g., type and location of work and availability of DBE's to perform the particular type of work).

We will express our contract goals as a percentage of the Federal share of a DOT-assisted contract.