

**Northwestern Indiana Regional Planning Commission
2024 – 2026 DBE Goal Methodology**

General Requirements

The Northwestern Indiana Regional Planning Commission (NIRPC) understands it is extremely important to include all our calculations and assumptions in our 2024– 2026 DBE Triennial Goal submission.

Fostering Small Business Participation 26.39

The Northwestern Indiana Regional Planning Commission will facilitate and encourage competition for small businesses, so recipients can make possible more DBE participation, and subsequent participation by additional DBE firms. The United States Department of Transportation believes “a program element that pulls together the various ways that a recipient reaches out to small businesses and makes it easier for them to compete for DOT-assisted contracts will foster objectives of the Disadvantaged Business Enterprise program.”

The DBE Rule states that the “DBE program must include an element to structure contracting requirements to facilitate competition by small business concerns, taking all reasonable steps to eliminate obstacles to their participation”. DBE Program elements must be actively implemented to foster small business participation.

To facilitate opportunities for race-neutral DBE participation, the Northwestern Indiana Regional Planning Commission will include certified small business enterprise firms in its DBE requirements for all contracts.

All references to requirements for prospective contractors and service providers to meet DBE goals will include certified small business enterprises as qualifying classifications for meeting those goals, regardless of those firms’ DBE status.

Small businesses that are recognized under federal, state, or local certification programs will be considered as eligible for inclusion.

Overall Goal 26.45

The Northwestern Indiana Regional Planning Commission will establish an overall DBE goal covering a three-year federal fiscal year period if we anticipate awarding DOT funded prime contracts the cumulative total value of which exceeds \$250,000 during any one or more of the reporting fiscal years within the three-year goal period.

In accordance with Section 26.45(f) the Northwestern Indiana Regional Planning Commission will submit its overall goal to DOT on **August 1** of every third year. Before establishing the overall goals each year, the Northwestern Indiana Regional Planning Commission will obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, effects of discrimination on opportunities for DBE’s, and the Northwestern Indiana Regional Planning Commission’s efforts to establish a level playing field for the participation of DBE’s.

Information on DBE firms will be pulled from the Census Bureau, quarterly subrecipient reports and INDOT. NIRPC will also discuss with subrecipient and community leaders about the availability of DBE businesses in the Lake, Porter and LaPorte communities.

The DBE goals will be established in accordance with the 2-step process as specified in 49 CFR Part 26.45. If the Northwestern Indiana Regional Planning Commission does not anticipate awarding DOT funded prime contracts the cumulative total value of which exceeds \$250,000 during any of the years within the three-year reporting period, we will not develop an overall goal; however, this DBE Program will remain in effect and the Northwestern Indiana Regional Planning Commission will seek to fulfill the objectives outlined in 49 CFR Part 26.1.

Step 1. The first step is to determine the relative availability of DBEs in the market area, “base figure”. We will use DBE Directories and Census Bureau Data, as a method to determine our base figure. This is the number of ready, willing and able DBE’s in the Lake, Porter and LaPorte county areas. A list of all firms, including non-DBE’s in Lake, Porter and LaPorte counties makes up the All Firms portion of the calculation.

Ready, willing, and able DBEs

Step One Base Figure = _____

All firms ready, willing, and able
(Including DBEs and non-DBEs)

Step 1: Base Rate Goal is the number of **RWA DBE Firms** divided by the number of **all RWA firms**. Weighting was used in the Step One Base Figure calculation by multiplying the base figure and the percent of total contracts.

Using the chart on Page 5 - Number of RWA DBE Firms is 28 divided by the number of all RWA firms is 1460 = 1.92% is the unweighted percent.

NAICS DATA

Total Businesses by NAICS Code (Lake, Porter, LaPorte Counties)

Contracting Opportunities	NAICS CODE	Total Businesses
Security/Electrical	561621	172
Signage	339950	0
Computer Equipment	811212	0
Automotive Oil Change and Lubricant	811191	10
Fuel	447190	39
Automotive Parts and Accessories	441310	117
Tire Dealer	441320	21
Motor Vehicle Towing	488410	22
Insurance (Property & Casualty)	524210	548
Administrative management consultants (ADA)	541618	0
Auto repair preventative maintenance	811111	446
Commercial & Institutional Construction (TransPorte)	236220	82
Landscape Architectural Svcs.	541320	3

Total DBE's by NAICS Code (Lake, Porter, LaPorte Counties)

Contracting Opportunities	NAICS CODE	Total Businesses
Security/Electrical	561621	7
Signage	339950	1
Computer Equipment	811212	7
Automotive Oil Change and Lubricant	811191	1
Fuel	447190	1
Automotive Parts and Accessories	441310	1
Tire Dealer	441320	0
Motor Vehicle Towing	488410	1
Insurance (Property & Casualty)	524210	0
Administrative management consultants (ADA)	541618	0
Auto repair preventative maintenance	811111	1
Commercial & Institutional Construction (TransPorte)	236220	7
Landscape Architectural Svs.	541320	1

The second step is to adjust the “base figure” percentage from Step 1 so that it reflects as accurately as possible the DBE participation the recipient would expect in the absence of discrimination based on past participation.

Any methodology chosen will be based on demonstrable evidence of local market conditions and be designed to ultimately attain a goal that is rationally related to the relative availability of DBEs in our market.

Step 2. Once we have calculated a base figure, we examine all evidence available in our jurisdiction to determine what adjustment, if any, is needed to the base figure to arrive at our overall goal. If the evidence does not suggest an adjustment is necessary, then no adjustment will be made.

Step 2 Adjustments: Past Participation Median + Weighted Base Figure (1.83+3.17 = 5)

Weighted % is 3.17% from **Breakdown of Contracts** chart (page 5), median is determined from past participation which is pulled from DBE subrecipient reports.

Goal= Adjusted Base Figure / Two (5 / 2 = 2.5%) Calculated DBE Goal for 2024-2026**

We have determined that the above goal may be unattainable during the 2024-2026 years. Many of our subcontractors were unable to utilize DBE firms in 2020 due to COVID, so the numbers during this time are not as accurate as in a normal business year. We determined the above number by using the historical median of the past three prior years and averaging it with our base figure.

When looking at the Breakdown of Contracts information, it should be noted only two years of spending are included. Since 2020 included the CARES Act funding we determined only using information from 2021 and 2022 would provide a more accurate accounting of information.

Therefore, Northwestern Indiana Planning Commission has decided to keep the **1.35 %** DBE goal in place for the 2024-2026 DBE program. After reviewing quarterly DBE reports from our subrecipients, researching available DBE firms and reviewing upcoming contracts this goal seemed to be more reasonable to pursue instead of the **2.5 %** that was calculated.

BREAKDOWN OF CONTRACTS # of Firms in Lake, LaPorte and Porter – # of DBE Firms in same areas available for these services.						
NORTHWEST INDIANA REGIONAL PLANNING COMMISSION 2024-2026 DISADVANTAGE BUSINESS ENTERPRISE (DBE) GOAL						
Type of Firm	Contract \$	Percent of Total Contracts	# of Firms Available	# of DBE Firms	Unweighted %	Weighted %
Computer & Computer Peripheral Equipment	\$35,700	3.85%	0	7	0.00%	0.00%
Administrative management and consultants/ADA consultant	\$11,300	1.22%	0	1	0.00%	0.00%
Preventative Maintenance (Automotive Repair)	\$214,560	23.13%	446	1	0.22%	0.05%
Automotive Parts & Accessories	\$100,907	10.88%	117	1	0.85%	0.09%
Support Equipment, Camera System, Radio & GPS System Tools (electrical contractors)	\$176,508	19.03%	172	7	4.07%	0.77%
Landscaping & Beautification	\$18,461	1.99%	3	1	33.33%	0.66%
Transportation Signage	\$61,950	6.68%	0	1	0.00%	0.00%
Commercial & Institutional Construction (TransPorte Office Renovation)	\$19,200	2.07%	82	7	8.54%	0.18%
Tire Dealers	\$52,003	5.61%	21	0	0.00%	0.00%
Security Lighting	\$50,000	5.39%	22	1	4.55%	0.25%
Fuel & Lubricants	\$531,110	57.26%	49	1	2.04%	1.17%
Insurance (Property & Casualty)	\$261,547	28.20%	548	0	0.00%	0.00%
Safety Equipment	\$13,758	1.48%	0	0	0.00%	0.00%
Total:	\$927,618	100.00%	1460	28	1.92%	3.17%

Past Participation (Previous Three Years)

2020	2.79%
2021	1.35%
2022	1.35%

In accordance with Section 26.45(g) the Northwestern Indiana Regional Planning Commission will publish a notice announcing the proposed overall goal on our official Internet Web Site www.nirpc.org informing the public of the proposed goal and its rationale for 15 days following the date of notice. The notice will also inform the public that the NIRPC will accept comments on the goals for 15 days from the date of the notice. 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 Northwestern Indiana Regional Planning Commission efforts to establish a level playing field for the participation of DBEs. The consultation will include direct, email and interactive exchange (e.g., a face-to-face meeting, video conference, email, and phone conversations) with as many interested stakeholders as possible focused on obtaining information relevant to the goal setting process, and it will occur before we are required to submit our goal methodology to the Federal Transit Administration for review. We will document in our goal submission the consultation process that we engaged in. We will not implement our proposed goal until we have complied with this requirement.