



**CAPE COD REGIONAL TRANSIT AUTHORITY**

**Disadvantaged Business Enterprises  
Goal Setting Methodology**

**FFY2025 – FFY2026**

## Attachment F - Overall Goal Calculation - Section 26.45

### Amount of Goal

CCRTA's overall goal for FY 2025 – FY 2026 is the following: 2.51% of the Federal Financial assistance. CCRTA will expend in DOT-assisted contracts *exclusive of FTA funds to be used for the purchase of transit vehicles*. (NOTE: CCRTA will revisit the Goal Calculation for applicability in FY 2026 once the Capital Plan for that year is developed and approved by the Advisory Board. Barring unusual changes in the capital plans, the 2.51% calculation will remain unchanged for those fiscal years.)

### Methodology used to Calculate Overall Goal

#### Step 1: 26.45(c)

CCRTA used a weighted base figure for the relative availability of DBEs.

The weighted base figure for the relative availability of DBE's was calculated as follows:

Project's Percentage of Total Budget x (RWA DBE's / All RWA Firms) = Weighted Base Figure

The data source used to derive the RWA DBE's was:

*Computer search of Directory of Certified Businesses in the Massachusetts Operational Services Division (OSD) Supplier Diversity Office database for all categories of capital procurements planned by CCRTA for FY 2025 – FY 2026.*

The data source used to derive the All RWA Firms was:

*Computer search of American Fact Finder Database maintained by the US Census Bureau, for all categories of capital procurements planned by CCRTA for FY 2025 – FY 2026.*

See Attachments F for calculations.

Using this methodology, CCRTA arrived at a weighted base figure for the overall goal and that number was 2.51%.

#### Step 2: 26.45(d)

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

Past Participation was considered but rejected as non-contributory. A significant portion of the previous three year goals were met by a single vendor performing a highly specialized task associated with CCRTA's bus overhaul program. Both the program and this particular contract have ended.

No other known evidence contributed evidence to support a change in the proposed goal.

In order to reflect as accurately as possible, the DBE participation CCRTA would expect in the absence of discrimination CCRTA has adjusted the base figure by 0 %.

From this data, CCRTA has adjusted the base figure to: No Change – adjusted figure is 2.51%

**DBE Goal Setting Expenditures by Year 2025 - 2026**

		Qty	Unit Price	Total Cost	NAICS Code		Ready, Willing, Able DBE's (not unique)	Massachusetts	Alabama	Percent - RWA Vendors	Percentage of spending	Weighted Percentage
FY25	New vessel Modifications and Retrofits*	1	\$194,563	\$194,563	562	\$194,563	26	0	391	6.65%	0.32%	0.021%
FY25	New vessel Modifications and Retrofits*	1	\$64,215	\$64,215	8112	\$64,215	6	0	59	10.17%	0.11%	0.011%
FY25	New vessel Modifications and Retrofits*	1	\$714,120	\$714,120	236220	\$714,120	50	0	595	8.40%	1.17%	0.099%
FY25	Rehab/Renovate - Bus Terminal	1	\$2,396,400	\$2,396,400	236220					0.00%		
FY25	Replace - Bus Shelters	1	\$20,000	\$20,000	236220					0.00%		
FY25	Construct Security Building	1	\$80,000	\$80,000	236220					0.00%		
FY26	Renovate - Bus Terminal	1	\$122,500	\$122,500	236220					0.00%		
FY26	Replace - Bus Shelters	1	\$30,000	\$30,000	236220					0.00%		
FY26	Rehab/Renovate Maintenance Facility	1	\$760,500	\$760,500	236220	\$3,409,400	52	315	0	16.51%	5.61%	0.925%
FY25	Construction of EV Infrastructure	1	\$1,856,939	\$1,856,939	237130					0.00%		
FY26	Construction of EV Infrastructure	1	\$645,000	\$645,000	237130	\$2,501,939	7	89	0	7.87%	4.11%	0.324%
FY25	New vessel Modifications and Retrofits*	1	\$588,830	\$588,830	238210	\$588,830	32	0	932	3.43%	0.97%	0.033%
FY25	Annual vessel drydocks and repairs	1	\$50,000	\$50,000	238210					0.00%		
FY26	Annual vessel drydocks and repairs	1	\$55,000	\$55,000	238210	\$105,000	86	4083	0	2.11%	0.17%	0.004%
FY25	Annual vessel drydocks and repairs	1	\$16,799	\$16,799	238220					0.00%		
FY26	Annual vessel drydocks and repairs	1	\$254,850	\$254,850	238220	\$271,649	30	4778	0	0.63%	0.45%	0.003%
FY25	New vessel Modifications and Retrofits*	1	\$417,192	\$417,192	238220	\$417,192	16	0	1564	1.02%	0.69%	0.007%
FY25	New vessel Modifications and Retrofits*	1	\$237,938	\$237,938	238290	\$237,938	10	0	120	8.33%	0.39%	0.033%
FY25	Miscellaneous Equipment	1	\$189,000	\$189,000	238290					0.00%		
FY26	Misc Support Equipment	1	\$664,500	\$664,500	238290	\$853,500	8	160	0	5.00%	1.40%	0.070%
FY25	Annual vessel drydocks and repairs	1	\$1,906,188	\$1,906,188	238320					0.00%		
FY26	Annual vessel drydocks and repairs	1	\$844,488	\$844,488	238320	\$2,750,676	99	1614	0	6.13%	4.52%	0.277%
FY25	Annual vessel drydocks and repairs	1	\$932,818	\$932,818	332710					0.00%		
FY26	Annual vessel drydocks and repairs	1	\$982,002	\$982,002	332710	\$1,914,820	9	784	0	1.15%	3.15%	0.036%
FY25	Acquire - ADP Software	1	\$115,000	\$115,000	334111	\$115,000	0	16	0	0.00%	0.19%	0.000%
FY25	Annual vessel drydocks and repairs	1	\$2,628,703	\$2,628,703	336611					0.00%		
FY26	Annual vessel drydocks and repairs	1	\$1,953,907	\$1,953,907	336611	\$4,582,610	0	22	0	0.00%	7.53%	0.000%
FY25	New vessel Modifications and Retrofits*	1	\$15,759,358	\$15,759,358	336611	\$15,759,358	0	0	20	0.00%	25.91%	0.000%
FY25	New vessel Modifications and Retrofits*	1	\$37,261	\$37,261	423450	\$37,261	3	0	98	3.06%	0.06%	0.002%
FY25	Acquisition Support Vehicles	1	\$40,000	\$40,000	441110					0.00%		
FY26	Acquisition Support Vehicles	1	\$40,000	\$40,000	441110	\$80,000	0	35	0	0.00%	0.13%	0.000%
FY26	Acquire 30-ft Buses - Gillig	1	\$13,500,000	\$13,500,000	485113	\$13,500,000	0	0	0	0.00%	22.20%	0.000%
FY25	New vessel Modifications and Retrofits*	1	\$96,192	\$96,192	541330	\$96,192	59	0	945	6.24%	0.16%	0.010%
FY25	New vessel Modifications and Retrofits*	1	\$756,180	\$756,180	811310	\$756,180	3	0	381	0.79%	1.24%	0.010%
FY25	Annual vessel drydocks and repairs	1	\$50,000	\$50,000	811310					0.00%		
FY26	Annual vessel drydocks and repairs	1	\$67,057	\$67,057	811310	\$117,057	4	549	0	0.73%	0.19%	0.001%
FY25	Buy Replacement <30-ft Bus	1	\$1,690,000	\$1,690,000	4231202					0.00%		
FY26	Buy Replacement <30-ft Bus	1	\$2,705,000	\$2,705,000	4231202	\$4,395,000	5	116	0	4.31%	7.23%	0.311%
FY25	Acquire Land	1	\$1,200,000	\$1,200,000	N/A	\$1,200,000	0	0	0	0.00%	1.97%	0.000%

\* Projects with asterisks have identified subcontract opportunities

From the Operating Budget		ANNUAL		
Contracted Services (Printing)	2	\$16,500	\$33,000	323111
Tires	2	\$9,166	\$18,332	423130
Fuel/Lubricants	2	\$1,423,627	\$2,847,254	424720
Misc Automotive Parts/Supplies	2	\$159,161	\$318,322	441310
Misc Office Supplies	2	\$120,257	\$240,514	453210
Insurance	2	\$1,122,589	\$2,245,178	524126
Contracted Services (IT Contracted)	2	\$48,000	\$96,000	541512
Contracted Services (Security)	2	\$180,000	\$360,000	561612
		\$6,158,600		
<b>TOTAL</b>		<b>\$60,821,100</b>		

	15	395	0	3.80%	0.05%	0.001%
	0	27	0	0.00%	0.03%	0.000%
	3	37	0	8.11%	4.68%	0.291%
	0	290	0	0.00%	0.52%	0.009%
	0	42	0	0.00%	0.40%	0.006%
	0	66	0	0.00%	3.69%	0.008%
	85	1011	0	8.41%	0.16%	0.010%
	5	109	0	4.59%	0.59%	0.010%
	613	14538	5105	3.12%	100.00%	2.51%

Massachusetts Vendor Data gathered from US Census 2020 Data at: <https://data.census.gov/all?q=massachusetts+businesses>  
 NAICS Code Data gathered from US Census 2022 Data at: <https://www.census.gov/naics/>

**Attachment G - Section 26.51: Breakout of Estimated Race-Neutral & Race Conscious Participation**

CCRTA will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating DBE participation. The CCRTA uses the following race-neutral means to increase DBE participation:

Increase public awareness of all contracting opportunities, especially Federal contracts, to ensure the widest participation possible in contract bids. Publishes its DBE goal on the CCRTA website, all social media, and in the newspaper; speaks to the Cape Cod Chamber of Commerce and encourages the distribution of CCRTA contract opportunities; distributes the DBE goal and contract opportunities to the Board of Directors who represent all the towns in the CCRTA service area.

CCRTA extracts the list of all registered DBE's from the Directory of Certified Businesses in the Massachusetts Operational Services Division (OSD) Supplier Diversity Office whenever an RFP is posted that contains opportunities for DBE participation and directly invites by email, all listed DBE's that provide service in the NAICS code matching the requested service.

CCRTA estimates that, in meeting the overall goal of 2.51 percent, CCRTA will obtain 2.51 percent from race-neutral participation and zero percent through race-conscious measures.

The following is a summary of the basis of the estimated breakout of race-neutral and race-conscious DBE participation:

For the past five years CCRTA has met or exceeded its DBE goal through race-neutral methods on an annual basis, even when CCRTA has fallen short on a semiannual basis. CCRTA proactively seeks out DBE companies as Prime contractors and through discussions with Prime contractors who are not DBE's CCRTA encourages them to make use of subcontractors who are DBE's. CCRTA advertises the DBE goal on all printed materials having to do with procurements; all outreach materials, and all printed publications including the CCRTA website.

In order to ensure that the DBE program will be narrowly tailored to overcome the effects of discrimination, if CCRTA uses contract goals CCRTA will adjust the estimated breakout of race-neutral and race-conscious participation as needed to reflect actual DBE participation (see Section 26.51(f)) and CCRTA 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.

## Attachment H - CCRTA Goal Setting Calculations

CCRTA started by identifying the capital projects and operating expenses which we expect to incur for FY 2025 – FY 2026.

**Capital projects** are those that have been programmed on the Massachusetts Statewide Transportation Improvement Program. The CCRTA along with its subrecipient, expects to spend \$60,821,100 on capital projects for FY 2025 - 2026. We expect to spend those funds in the following categories:

NAICS Code	Ready, Willing, Able DBE's	Massachusetts Vendor Pool	Alabama Vendor Pool (SSA)	Dollar Value
562	26		391	\$ 194,563
8112	6		59	\$ 64,215
236220	50		595	\$ 714,120
236220	52	315		\$ 3,409,400
237130	7	89		\$ 2,501,939
238210	32		932	\$ 588,830
238210	86	4,083		\$ 105,000
238220	30	4,778		\$ 271,649
238220	16		1,564	\$ 417,192
238290	10		120	\$ 237,938
238290	8	160		\$ 853,500
238320	99	1,614		\$ 2,750,676
323111	15	395		\$ 33,000
332710	9	784		\$ 1,914,820
334111	0	16		\$ 115,000
336611	0	22		\$ 4,582,610
336611	0		20	\$ 15,759,358
4231202	5	116		\$ 4,395,000
423130	0	27		\$ 18,332
423450	3		98	\$ 37,261
424720	3	37		\$ 2,847,254
441110	0	35		\$ 80,000
441310	0	290		\$ 318,322
453210	0	42		\$ 240,514
485113	0	0		\$ 13,500,000
524126	0	66		\$ 2,245,178
541330	59		945	\$ 96,192
541512	85	1,011		\$ 96,000
561612	5	109		\$ 360,000
811310	3		381	\$ 756,180
811310	4	549		\$ 117,057
N/A				\$ 1,200,000
<b>TOTAL</b>	<b>613</b>	<b>14,538</b>	<b>5,105</b>	<b>\$ 60,821,100</b>
			<b>19,643</b>	

In these categories, we have identified 613 vendors that are ready, willing and able to perform the services out of a pool of 19,643 vendors. The pool of ready, willing and able was determined by use of the Supplier Diversity Office vendor listing of qualified businesses in Massachusetts and the Alabama Department of Transportation Unified Certification Program. The pool of “all available” businesses was determined from the U.S. Census Bureau’s American Fact Finder database of businesses. See attached spreadsheet for breakdown.

The **Step One Base Figure** (unweighted) for DBE effort for the CCRTA for CAPITAL projects is 3.12%. See attached spreadsheet for actual calculations.

**Operating expenses** have been taken from the budget for 2025 and extrapolated into categories of spending. All non-salaried expenses have been further broken down into percentages of the overall amount and NAICS codes assigned. The resulting computations were evaluated the same as the methodology used for the Capital projects above. See attached spreadsheet for breakdown.

Finally, the two lists were merged, using a weighted evaluation which considers the individual project's percentage of the total budget, given that a large percentage of spending is concentrated in one large project. With this adjustment, the weighted base figure is 2.51%.

### **Step two: Base Figure Adjustment**

The base figure itself approximates the general availability of DBEs and potential DBEs. Federal regulations allow the CCRTA to adjust the base figure to refine, and better reflect the actual availability of DBEs and prospective DBEs that are ready, willing, and able to perform work on FTA-funded contracts made available through the CCRTA. Under USDOT regulations, while an adjustment is not mandated, the CCRTA can consider all evidence available to determine whether such an adjustment is warranted. In order to determine whether such an adjustment is appropriate, CCRTA considered several relevant factors. None of the available options for adjustment recognized by the FTA were relevant or significantly documented to justify modifying the base figure. Given the lack of adjustment, CCRTA is committed to spending 2.51 percent (2.51%) of the FFY25 non-payroll Federal spending with DBE's.

### **Step three: "Race/Gender-Neutral and Race/Gender-Conscious Split"**

CCRTA expects to meet the maximum feasible portion of our overall goal with 100% race/gender neutral means. All procurements of products and services that CCRTA distributes during any year includes a direct appeal to all DBE's registered with the Commonwealth of Massachusetts with an invitation to bid (see example email). Further, with rare exceptions, CCRTA does not require Bid Bonds to encourage more DBE's to submit proposals. This lowers the cost of responding to a bid for all bidders but DBE's welcome the lighter requirements. It is worth noting that CCRTA has met with mixed results seeking participation from DBE's. Many have declined because of the geographic remoteness of Cape Cod and others have been too busy when we needed their services. Nevertheless, CCRTA remains committed to meeting our goal by race neutral means.

**Attachment J – Legal Notice Verbiage**

**CAPE COD REGIONAL TRANSIT AUTHORITY  
NOTICE OF PROPOSED DBE GOAL FOR FY 2025 – FY 2026**

The Cape Cod Regional Transit Authority (CCRTA) proposed overall DBE goal for FFY 2025 – FFY 2026 is 2.51% of DOT assisted contracts. This goal and its rationale have been developed in accordance with the Federal Transit Administration's DBE program under the guidelines of 49 CFR Part 26 e-CFR. The goal and rationale are available for review for 30 calendar days from the date of this notice.

Comments will be accepted for 45 calendar days from the same date. Comments, requests to review or for copies of the proposed goal and its rationale, should be addressed to Debra Shores, DBE Liaison Officer, CCRTA, PO Box 1988, Hyannis, MA 02601, telephone (508) 775-8504, or by e-mail at: [dshores@capecodrta.org](mailto:dshores@capecodrta.org)

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August 23, 2024