



COLORADO
Department of
Transportation

Overall Annual DBE Goal for Transit

Federal Fiscal Years 2023 – 2025

US DOT Federal Transit Administration

CDOT Civil Rights & Business Resource Center

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EXECUTIVE SUMMARY

This document details the methodology used by the Colorado Department of Transportation (CDOT) to establish its three-year (FFY 2023-2025) overall annual Disadvantaged Business Enterprise (DBE) goal for contracts that contain funding assistance from the U.S. Department of Transportation (USDOT) Federal Transit Administration (FTA). This goal applies to CDOT's Division of Transit and Rail (DTR), which receives, distributes to subrecipients, and oversees the use of federal funds received by FTA.

CDOT established this goal in accordance with Part 26, Title 49 of the Code of Federal Regulations (49 CFR Part 26.45). As described below, CDOT evaluated potential contracting opportunities to be offered using FTA funds, the ready, willing and able DBEs to participate in such opportunities, and other relevant evidence in order to determine its overall goal. **CDOT proposes an FTA DBE goal of 2.44%** for the period of October 1, 2023 through September 30, 2025 (FFY 2023-2025). CDOT expects to meet the full 100% with race-neutral measures.

CDOT published the proposed goal on June 7, 2022 and encourage public review and comment through July 21, 2022. Several comments were received from local industry associations and CDOT considered these comments carefully. A Q&A document was developed in response to the comments and is included as an Appendix to the Methodology. CDOT will continue to engage in conversations with industry and its Transportation Commission about the methodology, overall annual goal, and potential options to encourage DBE participation to meet or exceed the race-neutral goal over the next three federal fiscal years.

CDOT is committed to monitoring DBE participation for all federal-aid transit projects to ensure the overall goal is being met. DBE achievements will be evaluated annually to determine whether market conditions warrant adjustments to the overall DBE goal, or the fully race-neutral approach. CDOT will also evaluate large transit projects awarded through the competitive process for race-conscious DBE goals, if appropriate.

FTA FUNDING ALLOCATION

CDOT DTR has forecasted the following FTA funding for state fiscal years (SFY) 2023-2025 (July 1, 2023 – June 30, 2025).

Table 1. FTA Funding Forecast (SFY 2023-2025)

Program	SFY 2023	SFY 2024	SFY 2025	Total
FTA-5304	\$545,694	\$562,065	\$578,927	\$1,686,686
FTA-5310	\$2,845,775	\$2,931,148	\$3,019,082	\$8,796,005
FTA-5311	\$16,991,497	\$17,501,242	\$18,026,279	\$52,519,018
FTA-5339	\$5,455,887	\$5,619,564	\$5,788,151	\$16,863,602
FTA Subtotal	\$25,838,853	\$26,614,019	\$27,412,439	\$79,865,311

The total of nearly \$80 million over the next three fiscal years takes into consideration additional funding expected to be received as a result of the Bipartisan Infrastructure Law (BIL). It also reflects a return to normal levels of funding post-pandemic without special stimulus funds such as those received during 2020 – 2021. CDOT excluded projected 5303 funds because those are granted to Metropolitan

Planning Organizations (MPO's) through the CDOT Division of Transportation Development (DTD) and do not represent contracting opportunities. The DBE goal methodology utilized the subtotal of all other expected FTA funding over the next three federal fiscal years to calculate the overall annual goal.

Data Collection

CDOT and its grant partners (subrecipients) use FTA funds for operations, administration, and capital purchases. Subrecipients may contract for goods and services from external vendors creating indirect FTA-assisted contracting opportunities for DBE firms. To evaluate these contracting opportunities, CDOT conducted an analysis of procurements and reimbursements during calendar years 2017 – 2019. This period was selected as the most representative of potential contracting opportunities anticipated during FFY 2023 – 2025 because it includes a majority of the anticipated subrecipient partners and excludes special stimulus funding that was granted during Q2 2020 – Q4 2021.

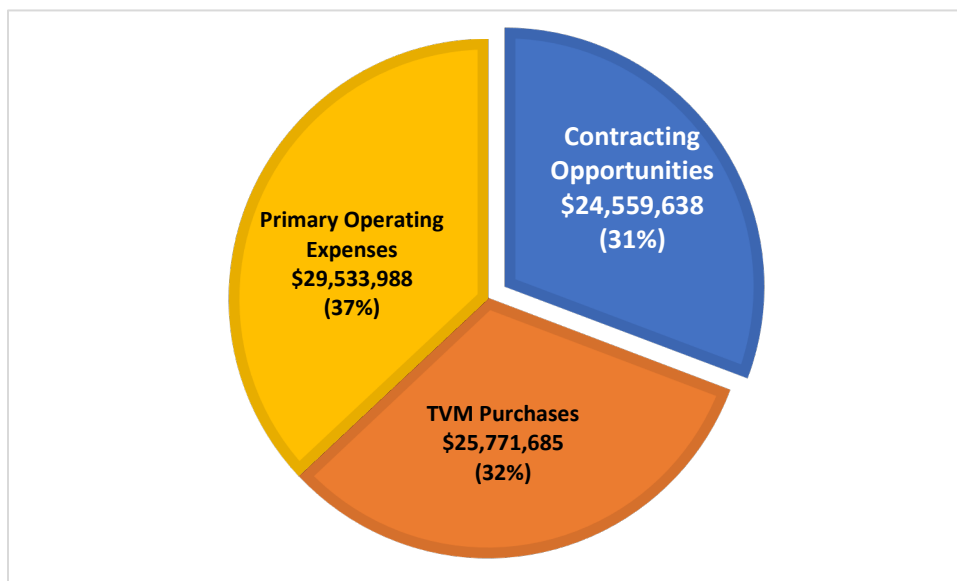
CDOT also conducted a survey of subrecipients to gather information about their projected use of FTA funds for contract opportunities over the next three federal fiscal years. The survey was sent to 118 organizations. Of those, 88 completed the survey for a 75% response rate. A total of 61 respondents (52%) indicated that they do expect to receive FTA funding in FFY 2023 – 2025 and 27 (23%) do not.

DBE Contracting Opportunities

The FTA provides a significant and valuable financial contribution to support DTR and its grant partners. Yet, when exemptions are factored in for administration, operating expenses, and TVM vehicle purchases, the potential for DBE contracting opportunities is limited to approximately one-third of the total funding provided by FTA to CDOT.

The following chart shows a breakdown of the anticipated FTA funds allocation and potential DBE contracting opportunities used as the basis for the goal setting methodology:

Chart 1. Forecasted FTA Funding Allocations (FFY 2023-2025)



Because subrecipients draw down CDOT-provided FTA funds over a course of multiple calendar years, there is not always a direct correlation between funds received from FTA and the contracting opportunities made available in the same year. Therefore, CDOT sought to obtain average expenditures of grantees in various contracting categories. Any anomalies for special allocations within the year were taken into consideration in determining potential opportunities.

DBE GOAL METHODOLOGY

The following goal calculations are based on projected contracting opportunities using potential FTA funding allocations during the methodology period and historical contracting activities. To derive the overall goal, CDOT used the two-step goal setting methodology specified in *49 CFR Section 26.45(c)*:

- Step 1: Develop a base figure for relative availability of DBEs
- Step 2: Adjust base figure, as needed, to arrive at an overall goal

Market Area Determination

Before beginning the base figure calculation, CDOT determined the relevant market area for the analysis. As defined by the *USDOT Goal Setting Tips*, the local market area is the area in which the substantial majority of the contractors and subcontractors with which CDOT and its grant partners do business are located, and the area in which CDOT and its grant partners spend the substantial majority of its contracting dollars.

All grants awarded by CDOT were to transit providers located within Colorado. These grant partners primarily use federal funds to procure goods and services from providers in their local areas. Many subrecipients are in rural communities not serviced by out-of-state vendors. Therefore, CDOT determined that the relevant market is the state of Colorado.

Availability Data

The relative availability of DBEs is defined as the total number of DBE firms that are ready, willing and able to perform the types of contracts CDOT anticipates awarding. CDOT used the approach suggested in *49 CFR 26.45(c)(1)* to compare the number of available DBEs to all firms in the industry.

The total number of firms within each industry within the market area of Colorado was identified from the most recent *U.S. Census Bureau 2020 County Business Patterns (CPB)*. This was determined to be the most current data available on all Colorado businesses (DBE and non-DBE). The CBP assigns a single primary industry (NAICS code) to each business. The total headcount of firms in each NAICS in Table 4.

The number of available DBE firms was derived from the *CDOT Unified Certification Program (UCP) DBE Directory*. The guidance in Section II.E of the [US DOT Tips for Goal Setting in the DBE Program](#) titled “Ensure That Your Percentage Reflects an “Apples to Apples” Calculation” states that “whenever you are calculating ratios, make absolutely certain that the DBE firms in the numerator and denominator are as similar as possible to the DBEs and non-DBE firms in the denominator.” The Colorado UCP Directory does not currently record primary NAICS codes for DBE firms. However, the CBP assigns a primary NAICS to all firms. To ensure an “apples to apples” availability calculation, CDOT evaluated all NAICS codes assigned to the DBE firms listed in the UCP Directory and assigned one NAICS code that best correlated with the firm’s primary area of work. This was done using information from the CDOT Contractor

Directory (B2G), CDOT FHWA DBE Overall Goal Methodology for FFY 2022 – 2024, the U.S. Small Business Administration Dynamic Small Business Search (DSBS), and the company’s website. Also consistent with DOT guidance, CDOT only considered DBE firms located in the market area of Colorado and did not consider out-of-state firms in order to ensure an “apples to apples” comparison with the total number of firms from the CBP with the specified primary NAICS codes.

Weighted Data

CDOT determined the relative weight of contracting opportunities by NAICS and type of work using historical data and the survey of subrecipients. All reimbursements under 5310 and 5311 fund types were evaluated over the period of 2017 – 2019. Each reimbursement category was calculated as a percentage of the total amount reimbursed during those years. Those percentages were then applied to the amount projected to be eligible for contracting opportunities over the next three federal fiscal years (see Table 2).

Table 2. Projected SFY 2023 – 2025 funding for contracted services using FTA 5310 and 5311 Funds

	5310/5311 FTA Reimbursements (CY 2017-2019)	Percent of Past 5310/5311 (CY 2017-2019)	Projected 5310/5311 Contracting Opportunities (FFY 2023-2025)
Advertising	\$247,040	1.74%	\$342,459
Audit	\$8,313	0.06%	\$11,524
Communications	\$61,584	0.43%	\$85,370
Consultant Services	\$152,873	1.08%	\$211,920
Contracted Services	\$434,617	3.06%	\$602,488
Facility Maintenance	\$573,580	4.04%	\$795,125
Fuel	\$3,494,868	24.61%	\$4,844,764
Materials & Supplies	\$454,336	3.20%	\$629,823
Other Expense	\$177,872	1.25%	\$246,575
Personal Services	\$38,461	0.27%	\$53,317
Transit Services	\$5,263,374	37.06%	\$7,296,356
Training	\$42,514	0.30%	\$58,935
Vehicle Maintenance	\$3,253,862	22.91%	\$4,510,668
Total	\$14,203,294	100%	\$19,689,325

For fund types 5304 and 5339, CDOT evaluated historical data to determine the percentage of funds allocated to TVM vehicle purchases (exempted) and the percent available for contracting opportunities related to planning and building construction. These percentages were applied to the projected funding amounts for FFY 2023 – 2025 resulting in the following dollar value for contracting opportunities.

Table 3. Projected 2023-2025 funding for contracted services using FTA 5304 and 5339 Funds

	Vehicle Procurement	Building Construction	Projected 5304/5339 Contracting Opportunities (FFY 2023-2025)
Planning (5304)	\$0	\$1,686,686	\$1,686,686
Statewide Bus & Facilities (5339)	\$9,550,881	\$3,183,627	\$3,183,627
Small UZA Bus & Facilities (5339)	\$4,129,094	\$0	\$0
Total			\$4,870,313

The combined total of projected contracting activities using fund types 5310, 5311, 5304, and 5339 equals **\$24,559,638** which is equivalent to the 31% indicated in Chart 1 as potential contracting opportunities.

STEP 1: DEVELOP A BASE FIGURE

In accordance with Section F of the *USDOT Tips for Goal Setting*, CDOT used the following formulas to determine the relative availability of DBE firms and subsequently the base figure for DBE participation.

Relative Availability of DBEs = # of DBE Firms in the Industry / All Available Firms in the Market Area

Forecast Weight = Amount in Contracting Area / Total Contract Opportunities

Weighted Availability = Relative Availability of DBEs x Forecast Weight

Base Figure = Relative Availability x Forecast Weight

Each contracting area was correlated to a NAICS code so that CDOT could determine the relative availability of DBE firms located in Colorado compared to all firms performing that type of work in Colorado. CDOT also considered NAICS provided by industry during the public comment period and included those in the analysis. The forecast weight is the percentage that each anticipated contracting opportunity represents of the total estimated FTA-assisted contracting opportunities projected for FFY 2023 - 2025. The relative availability of DBEs was determined by dividing the total number of DBE firms divided by the total number of firms in each work category (e.g., Advertising and Marketing). The weighted availability multiplied the relative availability in each category by the forecast weight.

The resulting base figure is 1.90% which is the total of all weighted availability in all work categories. The table below shows the NAICS categories that were used for each type of potential contracting opportunity and the weighted availability of DBE firms to perform the work. The base figure was calculated by totaling the weighted availability for all work categories.

Table 4. Weighted Availability Calculation

Contracting Opportunity	NAICS Code	NAICS Description	# of DBEs	Total Firms	Relative Availability	Forecast Weight	Weighted Availability
Advertising and Marketing	541810	Advertising Agencies	12	368			
	541850	Bus/transit Advertising	0	45			
	541840	Media Representatives	2	18			
		Subtotal	14	431	3.25%	1.39%	0.05%
Audit	541211	Auditor/CPA	3	1459			
		Subtotal	3	1,459	.21%	.05%	0.00%
Communications	541613	Marketing Consulting Services	47	1666			
	541820	Public Relations Agencies	13	264			
	541430	Graphic Design Services	21	511			
		Subtotal	81	2,411	3.32%	0.35%	0.01%
Consultant Services	541330	Planning/Engineering Services	88	2386			
	541310	Architectural Services	28	796			
	541620	Environmental Consulting	34	488			
	541690	Other/Safety Consulting	7	947			
		Subtotal	157	4,617	3.4%	.86%	.03%
Contracted Services	323111	Printing	14	306			
	488410	Motor Vehicle Towing	1	187			
	532120	Bus Rental or Leasing	0	99			
	541511	Computer Programming (IT)	11	5144			
	541512	Computer Design (Audio/Visual)	19	1858			
	561320	Temporary Staffing	29	821			
	561611	Background Check Services	0	101			
	621999	Drug and Alcohol Testing	3	106			
		Subtotal	77	5,622	1.37%	2.45%	.03%
Facility Maintenance	561720	Janitorial Services	88	2386			
	561730	Landscaping	25	2344			
	561790	Exterior Cleaning	2	271			
		Subtotal	51	4,160	1.23%	3.24%	.04%
Building Construction	213112	Support Activities for Oil and Gas	0	497			
	236220	Commercial and Institutional Building Construction	23	793			
	237110	Sewer, Water, Utility Line Construction	10	282			
	237120	Oil and Gas Pipeline Construction	0	70			
	237130	Power and Communications Lines	0	165			
	237310	Highway, Street, and Bridge Construction	39	233			
	237990	Other Heavy Civil Engineering	9	71			

Contracting Opportunity	NAICS Code	NAICS Description	# of DBEs	Total Firms	Relative Availability	Forecast Weight	Weighted Availability
	238110	Poured Concrete Foundation and Structure Contractors	15	561			
	238120	Structural Steel Contractors	11	107			
	238140	Masonry Contractors	7	441			
	238150	Glass and Glazing Contractors	2	158			
	238160	Roofing Contractors	8	925			
	238190	Other Foundation, Structure, and Building Exterior Contractors	8	207			
	238210	Electrical Contractors and Other Wiring Installation Contractors	47	2057			
	238220	Plumbing, Heating, and Air-Conditioning Contractors	22	2475			
	238290	Other Building Equipment Contractors	4	160			
	238310	Drywall and Insulation Contractors	17	561			
	238320	Painting and Wall Covering Contractors	15	1039			
	238330	Flooring Contractors	8	475			
	238350	Finish Carpentry Contractors	2	1025			
	238390	Other Building Finishing Contractors	6	215			
	238910	Site Preparation Contractors	27	951			
	238990	All Other Specialty Trade Contractors	36	925			
	339950	Sign Manufacturing	7	131			
	423320	Brick, Stone and Related Merchant Wholesalers	2	84			
	423330	Roofing, Siding, and Insulation Material Merchant Wholesalers	0	87			
	484220	Dump Trucking, Hauling	156	701			
	561990	Other Support Services (flagging, traffic control)	26	253			
	541370	Surveying and mapping	13	262			
		Subtotal	520	15,911	3.27%	12.96%	.42%
Fuel	424710	Petroleum Bulk Stations and Terminals	0	49			
	424720	Petroleum and Petroleum Products Merchant Wholesalers (except Bulk Stations)	2	54			
	447190	Other Gasoline Stations	0	139			
	454310	Fuel Dealers	0	98			
		Subtotal	2	340	.59%	19.73%	.12%
Materials and Supplies	424120	Office supplies	3	74			
	423120	Vehicle Supplies	3	180			
	423860	Transportation Equipment	0	19			
		Subtotal	6	273	2.2%	2.56%	.06%

Contracting Opportunity	NAICS Code	NAICS Description	# of DBEs	Total Firms	Relative Availability	Forecast Weight	Weighted Availability
Other Expense	423430	Computers and Software	0	161			
	541890	Promotional Items	2	151			
	459999	Recognition and Awards	1	658			
	424340	Boots	0	15			
	315210	Uniforms	0	23			
	423710	Hardware Merchant Wholesalers	2	93			
		Subtotal	5	1,101	.45%	1.00%	0.00%
Personal Services	541611	Administrative and General Management Consulting	48	2943			
	541614	Transportation Management Consulting	11	211			
		Subtotal	59	3,154	1.87%	.22%	0.00%
Planning Statewide and Rural	541330	Transportation Planning	88	2386			
	541320	Urban Planning	24	214			
		Subtotal	112	2,600	4.31%	6.87%	.30%
Transit Services	485113	Bus Transit Services	0	7			
	485210	Intercity and Rural Bus Service	0	5			
	485991	Paratransit Services	2	56			
	485999	Other Ground Transportation	1	43			
		Subtotal	3	111	2.7%	29.71%	.80%
Training	611430	Professional Development	8	363			
	611519	Bus Driver Training	0	116			
		Subtotal	8	479	1.67%	.24%	0.00%
Vehicle Maintenance	811111	General Automotive Repair	2	1519			
	811112	Body Shops and Repair	1	23			
	811113	Automotive Transmission Repair	0	87			
		Subtotal	3	1,629	.18%	18.37%	0.03%
	TOTAL		1,101	44,328		100%	1.90%

STEP 2: ADJUSTMENTS TO THE BASE FIGURE

49 CFR Section 26.45 (d) provides examples of the various types of data that can be examined to adjust the Step 1 base figure and narrowly tailor the goals to the local market area. Step 2 of the goal setting methodology is intended to adjust the base figure to reflect, as accurately as possible, the DBE participation CDOT would expect in the absence of discrimination. Using that guidance, CDOT considered the following factors to determine whether an adjustment is appropriate.

Past DBE Participation

CDOT evaluated past participation compared to the Step 1 base figure to determine if an adjustment was warranted. Table 5 shows CDOT's annual DBE participation for the past five (5) federal fiscal years. CDOT elected to use a five-year period because of the large fluctuation in DBE participation over the last three years. These variations were determined to be caused by two primary factors:

1. In 2019, CDOT was continuing to implement a more rigorous reporting process and had narrowed the scope of what costs could be claimed for FTA-funded reimbursement by subrecipients. There were also only two prime contracts awarded to DBEs in 2018 which was a significant reduction from previous years (see Table 8). These factors resulted in lower reported DBE participation and a shortfall for the year.
2. In 2020-2021, the COVID-19 pandemic caused a significant disruption for transit operators. Many CDOT subrecipients struggled to maintain service during this time. Federal stimulus funds were primarily directed to administration and overhead expenses such as salaries and rent in an effort to keep operations open. As a result, external contracting activities were significantly reduced, lowering the denominator for DBE participation. The award of just one (1) DBE contract (numerator) resulted in the highest achieved DBE participation to date.

By using a median of just the last three years, the extreme outliers caused by atypical conditions would be eliminated and only the middle year, which was the start of the pandemic, would be used for comparison. Using a five-year period allows CDOT to more accurately compare a pattern of DBE participation over a time with normal contracting activity. This also represents contracting activity that is more consistent with what is anticipated over the next three federal fiscal years.

Table 5. Past CDOT FTA DBE Goal Achievement

Federal Fiscal Year	Annual Overall FTA DBE Goal	Actual DBE Achievement (FTA-Assisted Projects Only)
2017	2.88%	3.14%
2018	2.88%	2.98%
2019	2.88%	.51%
2020	2.50%	6.85%
2021	2.50%	18.93%
Historical Median		2.98%

Pursuant to DOT guidance, CDOT is adjusting the Step 1 base figure by using the median DBE participation of 2.98%. This was averaged with the base figure of 1.90% resulting in a revised overall annual DBE goal of 2.44%.

FTA Region 8 Comparison

To add context for establishing a reasonable DBE goal, CDOT conducted a comparison of FTA DBE goals of DOTs in FTA Region 8. The Region 8 area includes Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming. These mid-western states share similar geographic and rural demographics. CDOT's previously established FTA DBE goal versus comparative states is 150% to 700% higher. While this

provides justification to lower the goal by 60% - 75%, CDOT is confident that it can meet the proposed adjusted goal of 2.44% based upon historical DBE participation.

CDOT determined that an adjustment to the base figure using this comparison is not warranted.

Table 6. Region 8 FTA DBE Goal Comparison of DOTs

State DOT	DBE Goal	Race-Neutral	Race-Conscious
Colorado	2.50%	2.50%	0.0%
Montana	0.70%	0.70%	0.0%
North Dakota	0.38%	0.38%	0.0%
South Dakota	0.99%	0.99%	0.0%
Utah	0.33%	0.28%	0.05%
Wyoming	1.0%	1.00%	0.0%

Large Transit Projects, Building Construction, and Competitive Grants

Similar to data collected during the last methodology, the largest contracting opportunities had little to no DBE availability. As shown in Table 4, there are a small percentage of certified DBEs in several NAICS codes that have the highest weighted contract opportunities. These include Transit Services (29.71%), Fuel (19.73%), and Vehicle Maintenance (18.37%). Collectively, these NAICS represent 68% of forecasted contracting opportunities for which there are only eight (8) DBE certified firms in Colorado. This results in a lower overall goal relative to FHWA-funded projects that have higher availability for the types of work contracted for highway design and construction.

However, Building Construction is one area where there is a relatively high availability of DBE firms (3.20%) and good potential for contracting opportunities (12.96%). The dollar value projected by CDOT for bus facilities using formula-based 5339 funds is \$3,183,627 (see Table 3). This amount was used to weight the opportunity for Building Construction. In the survey, CDOT asked subrecipients to estimate future contracting opportunities for Building Construction using FTA funds. Respondents reported a significantly higher projected amount of \$116,960,000. This included a “wish list” of large transit projects that may be awarded under FTA’s competitive 5339(b) grant process.

CDOT cannot predict how many of these competitive 5339(b) projects may actually be awarded or how much of the total projected cost would be funded by FTA through CDOT because of the discretionary nature of these awards. CDOT does not know if they will have oversight of these projects on behalf of the subrecipient until after FTA awards the discretionary funds. Therefore, these “special scenarios” are not accounted for in the DBE goal methodology. Rather, CDOT plans to establish a formal process to work with subrecipients to evaluate these opportunities for a race-conscious DBE goal when they are awarded. Currently, competitively awarded grants do not have race-conscious goals because CDOT’s overall annual goal is 100% race-neutral. CDOT believes that the projects awarded competitive 5339(b) funds represent the greatest potential for DBE participation because of the relatively availability for the types of work. Setting project-specific, race-conscious goals on these types of projects may increase overall DBE participation on FTA-assisted contracts.

Subrecipients are also more likely to conduct outreach and encourage general contractors to recruit DBE subcontractors when the work better aligns with the firms on the DBE Directory. One subrecipient with

an upcoming \$13.5 million transit facility construction project commented, “There are very few DBE businesses in our area outside of the road construction businesses. This is the first construction grant funding that we have had and will look for eligible DBE businesses to participate.”

In summary, CDOT is not making an adjustment to the base figure to account for potential large transit projects, building construction, or competitively awarded grants. However, CDOT will evaluate these projects for race-conscious DBE goals when they are awarded to a subrecipient. Examples include:

- Town of Snowmass Transit Center
- City of Cripple Creek Streetcar Maintenance and Storage Facility
- Summit County Transit Facility
- City of Trinidad Streets and Intersection Improvements

Survey of DBE Firms

In parallel to the survey of subrecipients, CDOT also sent a survey to all 1,737 firms listed on the Colorado UCP DBE Directory as of March 11, 2022. A total of 332 DBE firms (19%) completed the survey. A majority of respondents provide services related to Engineering, Building Construction, Transportation Planning, and Other Professional Services.

Although the sample was statistically small, it did provide insight into the interest of DBE firms in contracting on transit projects. A majority of those who responded (88%) indicated that they are interested in working with CDOT and subrecipients on transit-related projects. However, more than half (65%) do not know how to find transit-related contracting opportunities and half (50%) never or infrequently respond to transit bids/RFPs. The reasons cited were primarily;

- Lack of relationships with transit agencies (35%)
- Unsure of how to begin the process (30%)
- Don't know where to find transit opportunities (29%)

When asked how CDOT could help them get more work on transit-related projects, the majority responded;

- Provide information about upcoming opportunities (56%)
- Set higher DBE goals (48%)
- Break down large projects into smaller work codes (41%)
- Facilitate introductions to transit providers (38%)

It is apparent that DBE certified firms are interested in working on transit-related projects but need more information about opportunities and how to find them, as well as introductions to decision-makers within transit organizations. The fact that nearly half of respondents indicated that setting higher DBE goals would improve their ability to obtain work supports CDOT's proposed efforts to evaluate large and competitive projects funded under 5339.

Most subrecipients are proactive about encouraging DBE participation but may not know how to find or reach out to certified firms outside of their local area. These are all barriers that can be overcome through race-neutral means such as better communication about transit contracting opportunities,

more education for subrecipients about the DBE program and directory, and increased outreach to DBE firms about contracting opportunities.

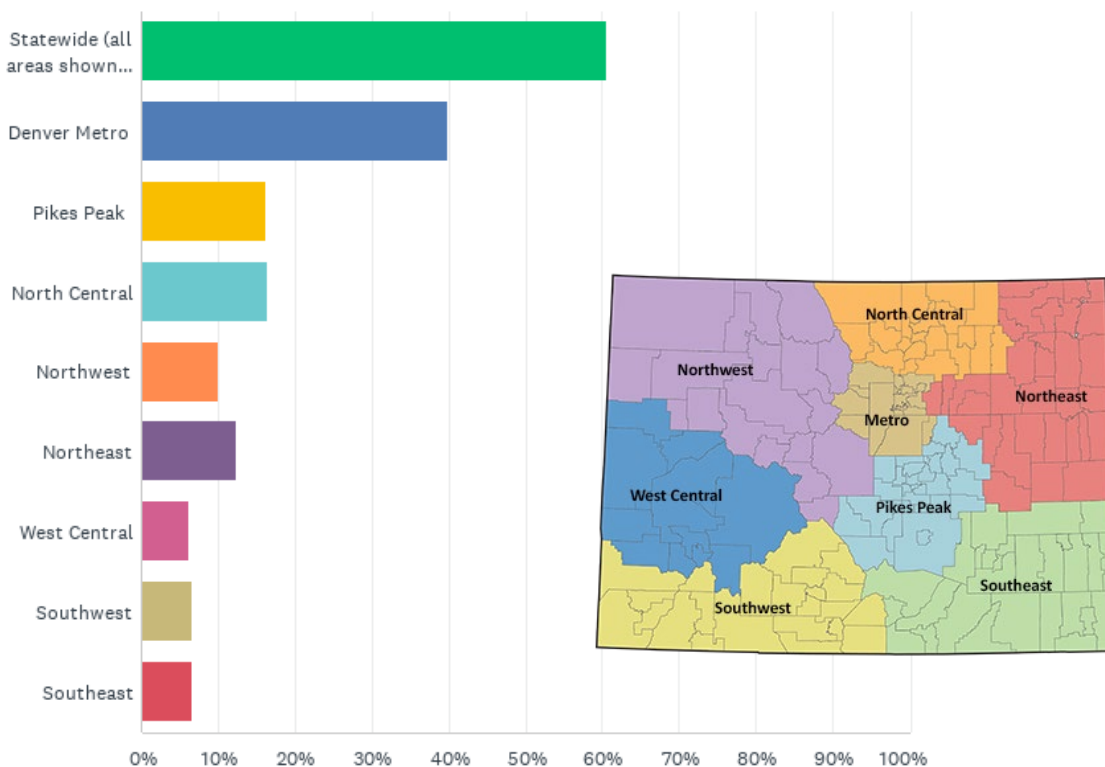
CDOT determined that the feedback captured on the survey of DBE firms will help inform future program activities but it does not warrant an adjustment to the base figure.

DBE Geographic Distribution

Several subrecipients commented on the survey that there is a lack of DBE contractors in the local area. They sometimes find it difficult to find any qualified vendors for certain services, let alone DBE certified firms. They often can only identify 1-2 DBE firms that may match very small opportunities in the rural area. As one mentioned, “There is very limited availability of DBE-certified firms within our small, remote region. More often there are no DBE-certified firms available, thus drastically reducing our ability to contract with DBE-certified firms.”

CDOT took the geographic availability of DBE firms into consideration and posed the question about work area to DBE firms on the survey. More than half (60%) indicated that they are willing and able to work statewide (see Chart 2). Only 2% of survey respondents said they don’t provide goods/services to rural areas. This data has remained consistent from the last methodology period. CDOT also identified several contracting opportunities for services such as Planning that are not location dependent and DBE consultants said they are willing to perform services statewide.

Chart 2. Percentage of DBE Firms Willing to Work in each Region



Even though the percentage of firms willing to work in rural areas is very low, combined with those who are willing to work statewide, the percentage of available firms grows by nearly 10 times. CDOT does recognize that there is an ongoing issue of only a few DBE certified firms located in rural areas, but the willingness of DBEs to work statewide supports the proposed overall statewide DBE goal.

CDOT determined that an adjustment to the base figure is not needed based upon geography.

BREAKOUT OF RACE NEUTRAL / RACE CONSCIOUS PARTICIPATION

The federal regulations require CDOT to meet the maximum feasible portion of its overall goal by using race and gender-neutral means. Race-neutral participation includes:

- DBEs who win prime contracts through customary competitive procurement procedures;
- DBEs who are awarded subcontracts on prime contracts that do not carry a DBE goal (0% assigned DBE goal); and
- DBEs who are awarded subcontracts in excess of the stated DBE project goal.

CDOT evaluated the awards on FTA-funded projects made to DBE prime contractors over the past five years (see Table 7).

Table 7. Past DBE Prime Contract Awards

Federal Fiscal Year	\$ of Prime Contract Awards	# of Prime Contract Awards	# of DBE Prime Awards	\$ Awarded to DBE Primes	Participation % by DBE Primes
2017	\$2,856,363	360	10	\$89,615	3.14%
2018	\$1,862,352	266	6	\$38,159	2.05%
2019	\$2,896,878	52	2	\$10,765	0.51%
2020	\$328,401	20	3	\$22,486	6.85%
2021	\$424,399	22	1	\$80,330	18.93%

As noted previously, there was a significant drop in the number of FTA-assisted contracts awarded by subrecipients during the COVID-19 pandemic. This reduced the overall pool of contracting opportunities available to DBE firms. The number of prime contract awards to DBEs fell 90% from 2017. However, CDOT achieved the highest percentage of race-neutral DBE participation in 2021 with nearly 19% coming from just one prime contract. It is evident that compared to 2017 – 2019, this is not a typical scenario.

While there has been a steady downturn in overall contracting activity, CDOT does not expect this trend to continue as funding levels and transit operations return to normal. In fact, CDOT anticipates higher levels of contracting of up to \$24.5 million as shown in Chart 1.

CDOT determine that there is ample opportunity for DBE firms to be awarded prime contracts to meet the proposed 2.44% overall annual DBE goal using 100% race-neutral methods. However, CDOT will evaluate large building construction projects for race-conscious goals, if appropriate.

Race-Neutral Methods

The ongoing initiatives described below seek to reduce discriminatory barriers, increase capacity and level the playing field for the participation of DBEs and other small contractors. They are also designed to assist CDOT in increasing race-neutral participation on FTA-funded contracts.

- CDOT helps to maintain the **UCP DBE directory** as a primary source of DBE firms, certified by CDOT and the City and County of Denver, eligible to meet DBE participation requirements on FHWA, FAA and FTA-funded contracts in Colorado. The availability of the DBE directory makes it easier for subrecipients to identify and contact DBEs for potential contracting opportunities.
- **Connect2DOT** is CDOT's outreach and technical assistance program designed to help small businesses in the transportation industry become more competitive and successful in bidding and contracting. Connect2DOT partners with the Colorado Small Business Development Center (SBDC) Network to offer one-on-one business and technical consulting, customized workshops and webinars, and various networking events to connect small businesses with transportation contracting opportunities. Connect2DOT also partners with industry resources such as the Colorado Minority Business Office, USDOT Small Business Transportation Resource Center (SBTRC), Conference of Minority Transportation Officials (COMTO), and Colorado Association of Transit Agencies (CASTA) to provide outreach and communications to stakeholders, DBE firms, and other small businesses in the transportation industry. A complete description of the program can be found at www.connect2dot.org
- One of the objectives of the CDOT Connect2DOT Program is to **Increase the pool of certified firms** eligible to work on CDOT highway design and construction contracts. By doing this, CDOT is also increasing the pool of DBE firms ready, willing, and able to work on FTA-assisted contracts. Because the scopes of work for FHWA and FTA are different, CDOT plans to make a concerted effort to also recruit and assist more potential DBE firms with certification through Connect2DOT support services.
- CDOT also **provides one-on-one consultation to DBEs** through the Connect2DOT program to help them understand opportunities with CDOT's transit partners. For example, CDOT notified certified firms on the DBE Directory about upcoming bid opportunities such as the Snowmass Transit Center project.
- CDOT is developing a more robust **education and outreach** effort with subrecipients and DBE firms to bridge the gap between subrecipients understanding how to identify DBEs for potential contracting opportunities and DBEs knowing where to find these opportunities. This was a concern expressed in both the subrecipient and DBE surveys. CDOT intends to create training to help subrecipients correlate NAICS to contract opportunities and seek out DBEs for bid solicitation. Similarly, CDOT is working on a webinar for DBE firms to help them understand the FTA funding funnel to subrecipients, the scopes of work typically contracted by subrecipients, and how to find and bid on opportunities.
- CDOT DTR and CRBRC participate in **monthly virtual meetings with subrecipients** to review DBE requirements and encourage research, outreach, and utilization of DBE firms to meet the overall annual goal. CDOT recently started featuring DBE firms during a **DBE Spotlight** at the monthly meetings where a DBE firm is invited to share their capabilities and experience working with transit organizations. This has helped facilitate networking between subrecipients and DBEs and has provided exposure to the various capabilities of DBEs statewide. CDOT intends to continue and enhance this practice by reaching out regularly to DBEs on the UCP Directory and creating a formal sign-up process for those DBEs that are interested in presenting at the monthly meetings.

PUBLIC PARTICIPATION & FEEDBACK

In accordance with *49 CFR 26.45*, CDOT reached out to industry stakeholders and minority group representatives to obtain feedback on the methodology and data being used to calculate the overall goal and evaluate barriers for DBEs. The surveys also provided a means to gather general comments from subrecipients and DBE firms about contracting opportunities on transit projects.

CDOT participated in the following meetings and provided information about the FTA DBE goal setting process and encouraged input and comments.

- February 23: FTA DBE Goal Survey of Subrecipients
- March 3: CDOT DTR Monthly Subrecipient Meeting
- March 11: FTA DBE Goal Survey of DBE Firms
- March 28: CDOT Small Business Collaborative Quarterly Construction Forum
- April 6: Hispanic Contractors of Colorado Infrastructure Committee Monthly Meeting
- April 12: ACEC/CDOT Quarterly Meeting
- April 14: CDOT Small Business Collaborative Quarterly Professional Services Meeting
- April 20: Hispanic Contractors of Colorado (HCC) General Member Meeting
- April 21: COMTO Colorado Monthly Member Meeting
- April 27: ACEC Annual Conference 2022
- May 18: Hispanic Contractors of Colorado (HCC) Contractor Academy Board Meeting
- May 26: 2022 CASTA Spring Training Conference
- **June 7: Publish Proposed DBE Goal Notice**
- July 6: HCC Infrastructure Committee Meeting
- July 7: CDOT Virtual Public Meeting (22 attendees)
- July 19: Meeting with HCC Stakeholders
- July 21: Public comment period concludes prior to Transportation Commission review
- **August 1: Submit DBE Methodology to FTA**

Public Comments

CDOT published the overall goal methodology on June 7, 2022 on the [Civil Rights and Business Resource website](#). An email notice was sent on the same day to all DBE firms, industry organizations, and grant partners. CDOT promoted the virtual public meeting that was held on July 7, as well as disseminating Information about availability of the methodology in the [Connect2DOT eNewsletter](#) which has over 5,500 subscribers

CDOT collected and tracked comments received from industry and evaluated each independently. An analysis was performed on potential Step 1 and Step 2 adjustments. A Q&A document was developed in response to the comments and is included as an Appendix. CDOT intends to continue to engage in conversations with industry about the methodology, overall annual goal, and potential options to encourage DBE participation to meet or exceed the race-neutral goal over the next three federal fiscal

years. CDOT is also engaged in ongoing discussions with its Transportation Commission regarding this methodology. These conversations may result in additional evaluation that could impact the methodology and the goal during the goal-setting period.

Additional comments related to the proposed FTA DBE overall goal or methodology should be directed to the CDOT DBE Program Manager shown below.

Jun Arcilla
DBE Program Manager
CDOT Civil Rights & Business Resource Center
2829 W. Howard Place
Denver, CO 80204
Jun.Arcilla@state.co.us

APPENDIX: INDUSTRY QUESTIONS AND ANSWERS

Below is a list of comments/questions received during the public comment period of June 7 – July 21, 2022 and CDOT’s subsequent analysis and response.

1. Can you provide a list of the 88 survey respondents?

A: See Appendix Table 1 and Appendix Table 2.

2. The selection of NAICS is subjective and we think others should be included in the methodology, specifically 237310, 238990, and 238210. Can all NAICS be included in the analysis?

A: For the FTA DBE Goal Methodology, CDOT considered the contracting opportunities that will be available using FTA funds over the next three federal fiscal years. To do this, CDOT analyzed past contracts awarded by DTR and CDOT’s subrecipients using FTA funds. CDOT also reviewed survey responses from subrecipients about their anticipated contracting activity, which includes competitive grants that may or may not be awarded. The anticipated scopes of work were captured in the NAICS outlined in Table 4 on pages 7-10 of the Methodology.

Only those NAICS that represent future contracting opportunities using FTA funds were included in the analysis. Other NAICS could be added to the analysis but they would not have a forecasted weight as shown in Table 4 of the Methodology and therefore the net impact to the Step 1 goal calculation would be 0%.

CDOT received a list of additional NAICS for consideration during the public comment period. NAICS 238210, 238990, 541330, 541370, and 561730 had already been included in the draft analysis. The following NAICS were added to the final analysis.

- 237310 Highway, Street, and Bridge Construction
- 237990 Other Heavy and Civil Engineering Construction
- 237130 Power and Communication Line and Related Structures Construction
- 237120 Oil and Gas Pipelines and Related Structures Construction
- 561730 Landscaping Services
- 541370 Surveying & Mapping
- 423320 Brick, Stone, and Related Construction Material Merchant Wholesalers
- 423330 Roofing, Siding, and Insulation Material Merchant Wholesalers
- 423710 Hardware Merchant Wholesalers
- 541330 Engineering services
- 213112 Oil & Gas, drilling, exploration, field services

The net change increased the Step 1 Base Figure by .01% from 1.89% to 1.90%. Using the same Step 2 adjustment, the overall annual DBE goal remained 2.44% due to rounding.

3. Other transit agencies such as RTD include 237310 in their methodology. Why doesn't CDOT?

A: CDOT and RTD have very different contracting opportunities. RTD's DBE Methodology for FFY 2023 – 2025 considered three NAICS based upon their projected contracting activities; 237310, 238910 and 238210. RTD can provide more information about why those NAICS were chosen. CDOT originally considered 71 NAICS and added 11 NAICS, including 237310, per industry request for a total of 82 NAICS. These are outlined in the Methodology document.

4. Did CDOT use the national DBE directory or the SBA directory to identify available DBE firms?

A: CDOT does not know of a national DBE directory. Each state manages their own directory of certified DBE firms. CDOT utilized the Colorado UCP DBE Directory to identify DBE firms. CDOT also used the SBA Dynamic Small Business Search database (DSBS) which lists firms who are registered in the federal System for Award Management (SAM). DSBS contains a primary NAICS for each company which is provided by the individual firm. CDOT utilized this database to verify the primary NAICS for Colorado DBE firms, as well other sources as noted on page 5 of the Methodology.

5. The DBE Directory has around 1,700 firms. Why does your methodology only have around 1,000 DBE firms?

A: CDOT's draft Methodology captured 1,049 DBE firms in the 71 NAICS codes that are relevant to future contracting activities using FTA funds. Per industry comments, another 11 NAICS were added to the final analysis which brought the total number of DBEs to 1,101. The number of DBEs were pulled from the UCP DBE Directory as of March 5, 2022. The total used in the analysis is less than all firms that were certified as of that date because only a subsegment of NAICS codes apply to future projected contracting opportunities using CDOT's FTA allocated funds. For example, NAICS 236115 New Single-Family Housing Construction is the primary NAICS for two DBEs on the UCP DBE Directory. However, that NAICS is not considered a potential contracting opportunity for CDOT's allocated FTA funds.

6. CDOT is expected to receive about \$700 million in infrastructure funding. Was this taken into consideration in the methodology?

A: As outlined on page 3 of the Methodology, CDOT anticipates receiving \$79,865,311 in funding categories 5304, 5310, 5311, and 5339 from FTA over the next three state fiscal years. Fund category 5303 was not included in the DBE goal Methodology because those funds are granted directly to Metropolitan Planning Organizations (MPOs). Of the total projected funding in all other categories, CDOT expects 31% or \$24,559,638 to be available for contracting in FFY 2023 – 2025 as shown on page 4 of the Methodology. This was calculated based upon an analysis of historical contracting activities and an estimate of future projected spending in each fund category.

Additionally, Section H of the [USDOT Tips for Goal Setting in the DBE Program](#) states; “It is never appropriate to adjust your measurements of relative DBE availability, either in Step One or in Step Two, solely because the size of your contracting program will change in the next fiscal year. For example, if you assume that non-DBEs will be able to expand to compete for large influx of new program dollars, you should make the same assumption about DBEs, absent specific evidence to the contrary.”

In CDOT’s survey of DBE firms regarding transit opportunities (see **Appendix Chart 1**), nearly 95% of respondents indicated that they would take on additional work, grow their capacity, and/or expand into other regions of the state if their business was presented with new transit project opportunities. Only 1% responded that they would turn down the work. Based upon this feedback, CDOT made the assumption that both DBE and non-DBE firms would be able to expand to meet additional demand if there is an increase in FTA funds granted to CDOT over the next three federal fiscal years

7. Why does CDOT use a primary NAICS rather than counting all DBEs certified to do work in all NAICS?

A: The [US DOT Tips for Goal Setting in the DBE Program](#) suggests that recipients ensure percentages reflect an “apples to apples” calculation: “Whenever you are calculating ratios, make absolutely certain that the DBE firms in the numerator and denominator are as similar as possible to the DBEs and non-DBE firms in the denominator.” Because the most comprehensive data for companies in a market area by NAICS is the Census County Business Patterns (CBP), CDOT chose this for the denominator of the DBE availability calculation. The CBP classifies each company with a single primary NAICS. To ensure the numerator used the same head count Methodology, DBE firms were assigned a primary NAICS. Since all Colorado-based companies only show up once in a NAICS category in the CBP, CDOT ensured that DBE firms only showed up once in a NAICS category.

8. Did CDOT look at other Disparity Studies?

A: As part of the DBE Goal Methodology for FHWA-assisted contracts in FFY 2022 – 2024, CDOT reviewed the 2020 State Disparity Study and the 2018 City and County of Denver Disparity Study. During that analysis, CDOT determined that the State Disparity Study was focused on state-funded contracts which account for only a small percentage of CDOT projects that are not eligible for the FHWA or FTA DBE program. Additionally, data in several contracting categories were combined such as highway construction and building construction. That did not provide a level of granularity needed for CDOT’s FTA DBE Goal Methodology. CDOT also determined that because the City and County of Denver Disparity Study was geographically constrained to the Denver Metropolitan Statistical Area (MSA) and it included FAA-funded contracts which are substantially different than FTA-assisted contracts, that study could not be used as a comparative factor for a Step 2 adjustment.

9. Why doesn't CDOT use an average of past DBE participation over the last 3 years which would be around 7 or 8 percent?

A: The [US DOT Tips for Goal Setting in the DBE Program](#) provides guidelines for Step Two adjustments to the Base Figure which include using past participation as a factor. "The first step in adjusting your Step One Base Figure for past participation is to determine your "median" past participation percentages. Your goal setting process will be more accurate if you use the median (instead of the average or mean) of your past participation to make your adjustment because the process of determining the median excludes all outliers (abnormally high or abnormally low) past participation percentages." CDOT chose to use the median over the past five years to eliminate any anomalies that occurred due to the pandemic years of 2020-2021 and changes to CDOT's DBE reporting process in 2019.

10. The Census data used to identify the total number of firms in Colorado is from 2020 and out of date. Can CDOT use more current data?

A: The 2020 Census Data on County Business Patterns (CBP) was identified by CDOT as the most current database of all firms by geography and NAICS. CDOT is open to using a more current data source if one is suggested that has the same level of detail. Per the [US DOT Tips for Goal Setting in the DBE Program](#) "When using census and other data organized by SIC codes or the NAICS codes (which will eventually replace the SIC system), try to use the most refined data available. This will help you to focus more precisely on the firms with which you or your prime contractors will actually be doing business and help you to avoid overestimating the number of firms in either the numerator or the denominator."

11. CDOT indicated that they used data from the period of 2017 – 2019 for procurement and reimbursement activity. Why wasn't 2020 – 2021 data included?

A: As mentioned on page 4 of the Methodology, calendar years 2017 – 2019 was selected as the most representative of potential contracting opportunities for 5310 and 5311 fund types because it includes a majority of the anticipated subrecipient partners and excludes special stimulus funding that was granted during Q2 2020 – Q4 2021. A majority of stimulus funding was used by subrecipients for Administration and Operations to stay afloat during the pandemic. It was not generally used for contracts with outside vendors and therefore the period of 2020 – 2021 significantly under-represents typical contracting activity by subrecipients. The historical lookback was used only to determine the percentage of overall contracting activity (not the dollar value) for specific goods and services purchased using 5310 and 5311 funds. Those percentages were then applied to the future funding projections as shown in Table 2 of the Methodology. For fund types 5304 and 5339, CDOT estimated the percentage split between vehicles (exempted from contracting opportunities) and building construction (availability for contracting). These percentages were applied to future funding projects as outlined in Table 3 of the Methodology.

While CDOT acknowledges that there will be an increase in FTA funding over the next three federal fiscal years as shown in Table 1 of the Methodology, using a percentage for the DBE goal allows the overall dollar value of contract awards to expand and contract with the amount of available funding.

12. Can CDOT include out-of-state DBE firms in the head count of DBE firms for the methodology?

A: CDOT applies the same “Apples to Apples” comparison for the head count of DBEs that is recommended in the [US DOT Tips for Goal Setting in the DBE Program](#) (refer to Question 7). CDOT identified the market area as the state of Colorado as outlined on page 5 of the Methodology. To ensure the data used for numerator and denominator in the Step 1 base figure calculation is “apples to apples,” CDOT restricted both head counts to the Colorado market area. That means, CDOT only counted DBEs located in Colorado (numerator) and only firms located in Colorado (denominator).

13. There are several Bus Rapid Transit (BRT) projects slated to happen over the next several years. Were these included in the analysis?

A: CDOT must apply to US DOT for funding to advance large transit projects such as the proposed BRTs. There is not a forecast to know for certain that this funding, or those projects, will move forward over the next three federal fiscal years. Therefore, it is impossible to include these in the current analysis of opportunities. Additionally, the CDOT Division of Transit and Rail (DTR) does not anticipate managing a large-scale BRT and therefore, those types of projects would most likely go through the Highway Engineering and Construction Division and would fall under FHWA funding and CDOT’s Overall Annual FHWA DBE Goal.

On page 11 of the Methodology, CDOT is recommending to FTA a new process to evaluate large transit projects, building construction, and competitive grants for DBE goals when those projects are awarded and/or funded with FTA dollars. If approved by FTA, CDOT would have the ability to evaluate a BRT project for a race-conscious DBE goal if it is managed by DTR or a CDOT direct subrecipient.

14. Why doesn’t CDOT include RTD, City and County of Denver, Commerce City and other urban area projects in the methodology?

A: All FTA funding received by CDOT can only be allocated to rural transit projects. Urban centers with transit operations such as RTD and City and County of Denver receive their own FTA funding and, if it is greater than \$250,000, are required to have their own DBE program and goals. Therefore, urban projects are not included in the list of potential contracting opportunities using FTA funds allocated by CDOT. However, CDOT did count all DBEs regardless of their location in an urban or rural area based upon information gathered in the

Survey of DBE Firms in which 60% of respondents indicated that they are willing and able to work statewide, as describe on page 13 of the Methodology.

15. Page 13 of the methodology states that 60% of DBEs are willing to work statewide but it also says that subrecipients commented on the survey that there is a lack of DBE contractors in the local area. How did CDOT account for these two different perspectives?

A: As noted on page 14 of the Methodology, CDOT determined that an adjustment to the base figure was not needed based upon geography. The reason is specifically because of the feedback received from subrecipients and DBEs in separate surveys. If CDOT only considered the feedback from subrecipients, a downward adjustment to the base figure would be warranted because of the assumption that there is a lack of DBEs in rural areas. Additionally, the Base Figure calculation considers all DBEs to be ready, willing, and able to work on all potential FTA-assisted contracts in all areas of the state. This could also warrant a downward adjustment because CDOT could assume that a certain percentage of DBEs would not bid on all opportunities. However, by surveying DBE firms about their willingness to work on FTA-assisted contracts and work statewide, CDOT was able to determine that more DBEs are available to work in rural regions, even if they are not located in that area. Therefore, CDOT did not make a Step 2 downward adjustment.

16. Why did CDOT use their “CDOT-only Unified Certification Program” database to count DBEs and not include DBEs that may be present through the City and County of Denver DBE Program?

A: The Colorado Unified Certification Program (UCP) DBE Directory is an all-inclusive listing of all DBEs certified in Colorado. It “unifies” DBE certifications of the two certifying agencies, CDOT and City and County of Denver, into a single, collective database of all DBE certifications in Colorado.

Appendix Table 1: List of subrecipient survey respondents that **do** anticipate receiving FTA Funding in FFY 2023 - 2025

The following transit organizations completed the survey and indicated that they anticipate receiving FTA funding from CDOT in the next 3 federal fiscal years.

Anticipate FTA funding in FFY 2023-2025	Location
All Points Transit / Montrose County Senior Citizens Transportation, Inc.	Montrose County
Boulder County	Boulder County
Bent County Transit	Bent County
Black Hills Stage Lines / Express Arrow	Summit County
CDOT DTR	Statewide
City of Aspen	Aspen
City of Black Hawk	Black Hawk
City of Craig	Craig
City of Cripple Creek	Cripple Creek
City of Durango	Durango
City of Glenwood Springs	Glenwood Springs
City of Steamboat Springs	Steamboat Springs
City of Trinidad	Trinidad
Colorado Association of Transit Agencies	Denver
Community Connections, Inc.	Durango
Community Services and Supports	Colorado Springs
DayBreak - An Adult Day Program	Woodland Park
Dolores County Senior Services	Dolores County
East Central Council of Governments	Cheyenne, Elbert, Kit Carson and Lincoln Counties
ECO Transit	Eagle County
Envida Cares / Disability Services, Inc.	Colorado Springs
Estes Transit	Estes Park
Family Health West	Fruita
Goodwill of Southern and Western Colorado	Colorado Springs
HopeWest	Mesa, Delta, Montrose, Ouray, and Rio Blanco Counties
Inspiration Field	La Junta
Laradon Hall Society	Denver
Mesa County RTPO	Mesa County
MoCo Transportation	Montezuma County
Mountain Express	Edwards
Mountain Family Center	Granby
Mountain Metropolitan Transit	Colorado Springs
Mountain Valley Developmental Services	Glenwood Springs

Anticipate FTA funding in FFY 2023-2025	Location
Northeast Colorado Association of Local Governments (NECALG)	Fort Morgan
Neighbor to Neighbor Volunteers	Chaffee County
North Front Range MPO	Larimer and Weld Counties
Northwest Colorado Council of Governments	Summit, Eagle, Pitkin, Routt, Jackson and Grand Counties
Northwest Colorado Center for Independence (NWCCI)	Steamboat Springs
Park County	Park County
Prowers Area Transit	Prowers County
Roaring Fork Transit Authority (RFTA)	Garfield, Eagle, Pitkin Counties
Routt County	Routt County
San Miguel Authority for Regional Transportation (SMART Ride)	Telluride, Mountain Village, and San Miguel County
Southeast Colorado Enterprise Development, Inc. (SECED)	Baca, Bent, Crowley, Kiowa, Otero and Prowers Counties
Senior Resource Development Agency, Inc. (SRDA)	Pueblo
Silver Key Senior Services, Inc.	Colorado Springs and Manitou Springs
South Central Council of Governments (SCCOG)	Pueblo, Huerfano and Las Animas Counties
Southern Colorado Community Action Agency / Road Runner Transit	Ignacio, Durango, Bayfield
Southwest Center for Independence	La Plata County
Summit Stage	Summit County
Teller Senior Coalition	Teller County
The Lift	Winter Park
Town of Avon	Avon
Town of Mountain Village	Mountain Village
Town of Snowmass Village	Snowmass Village
Town of Telluride	Telluride
Town of Vail	Vail
Town of Winter Park	Winter Park
Upper Arkansas Area Council of Governments	Custer and Freemont Counties
Via Mobility Services	Boulder and Denver

Appendix Table 2: List of subrecipient survey respondents that **do not** anticipate receiving FTA Funding in FFY 2023 – 2025

The following transit organizations were contacted because they had received FTA funding from CDOT over the past 3 years. However, they indicated on the survey that they do not anticipate receiving FTA funding from CDOT in the next 3 federal fiscal years.

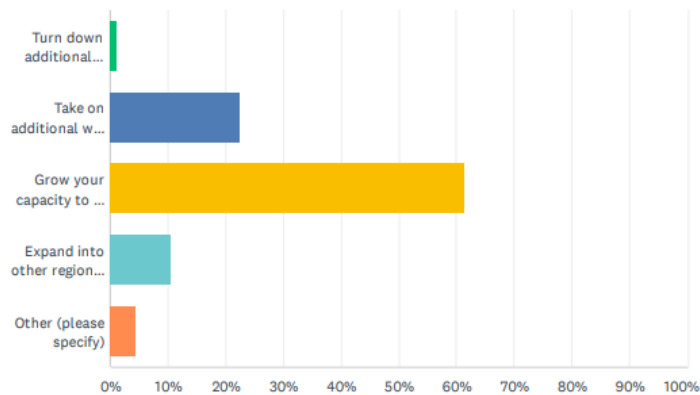
Do not anticipate FTA funding in FFY 2023-2025	Location
Baca Area Transportation	Baca County
Blue Peaks Developmental Services, Inc	Alamosa
City and County of Broomfield	Broomfield
City of Fort Collins, Transfort	Fort Collins
City of Littleton (Omnibus)	Littleton
City of Loveland Transit	Loveland
City of Montrose	Montrose
Community of Caring Foundation	Cripple Creek
Community Options Inc.	Montrose
Continuum of Colorado	Aurora
Denver Regional Council of Governments	Denver
Easterseals Colorado	Lakewood
Goodwill of Colorado	Denver
Greeley-Evans Transit	Greeley and Evans
Greyhound Lines	Colorado Springs
Gunnison Valley RTA	Gunnison Valley
Hinsdale County	Hinsdale County
HopeWest Delta	Delta
Horizons Specialized Services	Routt, Moffat, Rio Blanco, and Grand Counties
Imagine!	Boulder County
Lakewood Rides	Lakewood
Rocky Mountain Health Care Services	Colorado Springs
San Luis Valley Development Resources Group	San Luis Valley
Silver Key Senior Services	El Paso County
SDS, Inc.	Prowers, Baca, Kiowa and Bent Counties
Town of Milliken	Miliken
Walsh Hospital District	Walsh

Appendix Chart 1: Survey of DBE Firms – Question 10 Regarding Capacity

CDOT FTA DBE Goal Survey of DBE Firms for FFY 2023 - 2025

Q10 If your business was presented with new transit project opportunities over the next three years, would you:

Answered: 267 Skipped: 67



ANSWER CHOICES	RESPONSES	
Turn down additional opportunities (maintain your current level of work)	1.12%	3
Take on additional work with your current staff and/or subcontractors (increase the amount of work)	22.47%	60
Grow your capacity to do additional work (increase your amount of work and number of staff and/or subcontractors)	61.42%	164
Expand into other regions of the state (increase your amount of work and geographic reach)	10.49%	28
Other (please specify)	4.49%	12
TOTAL		267