

**The Delaware Transit Corporation
Disadvantaged Business Enterprise
Overall Goal for FFY 2026-2028 and Goal Setting Methodology**

Introduction

The Delaware Transit Corporation (DTC) hereby submits its Disadvantaged Business Enterprise (DBE) overall goal and goal setting methodology for federal fiscal years 2026-2028 to the Federal Transit Administration (FTA) for review and approval pursuant to 49 CFR Part 26. The goal and methodology establish DTC's overall DBE goal for FTA-assisted contracts that DTC anticipates awarding in Federal Fiscal Years (FFY) 2026, 2027, and 2028. **The overall goal for FTA-assisted contracting for FFY 2026-2028 is 6%.** DTC is projecting that its DBE Goal is **1% by race-neutral means** and **5% by race-conscious means**. To establish its overall goal, DTC followed federal regulations, including the two-step goal-setting methodology set forth in 49 CFR Part 26.45. DTC determined 'a step-one' base figure for its overall DBE goal using information from the DelDOT DBE Database as well as from the U.S. Census Bureau's County Business Patterns.

Step 1. Determining a Base Figure – 49 CFR §26.45(c)

DTC estimates that it will receive approximately \$14.6 million in FTA financial assistance that can be awarded via contracts during FFYs 2026, 2027 and 2028. This does not include FTA financial assistance for the purchase of vehicles

Per 49 CFR §26.45(b), the "triennial goal must be based on demonstrable evidence of the availability of ready, willing and able DBE's relative to participate on your DOT-assisted contracts..." DTC began the DBE goal-setting process by determining a base figure for the relative availability of DBEs. DTC then looked at the individual projects that it anticipates awarding in FFY 2026-2028 and assigned North American Industry Classification System (NAICS) codes, identifying all firms available through the U.S. Census Bureau's County Business Patterns.

Projects were broken down into small segments to allow for as many DBE opportunities as possible. This breakdown is found in Figure 1 below.

Figure 1

Project Description	FTA Funds	NAICS Code	Number of DBEs available to perform this work (1)	Number of Firms available (including DBEs) (2)
Beech St Maintenance Building - CE - \$384,000				
Engineering Services	\$384,000	541330	11	223
Beech St Maintenance Building - C - \$8,652,734				
Poured Concrete Foundation and Structure Contractors	\$356,069	238110	5	49
Structural Steel and precast Concrete Contractors	\$599,777	238120	3	16
Masonry Contractors	\$540,343	238140	3	65
Plumbing, Heating and Air Conditioning Contractors	\$1,436,848	238220	1	335
Electrical Contractors and Other Wiring Installation Contractors	\$419,593	238210	6	282
Site Preparation Contractors	\$1,311,332	238910	7	114
All Other Specialty Trade Contractors	\$3,988,772	238990	7	107
Dover Battery Electric Bus Maintenance Bay - C - \$480,000				
Plumbing, Heating and Air Conditioning Contractors	\$100,000	238220	1	335
Electrical Contractors and Other Wiring Installation Contractors	\$120,000	238210	6	282
All Other Specialty Trade Contractors	\$260,000	238990	7	107
Georgetown Bus Wash Replacement and NPDES Improvements - C - \$2,000,000				
Poured Concrete Foundation and Structure Contractors	\$26,799	238110	5	49
Structural Steel and Precast Concrete Contractors	\$8,402	238120	3	16
Masonry Contractors	\$59,704	238140	3	65
Plumbing, Heating and Air Conditioning Contractors	\$211,425	238220	1	335
Electrical Contractors and Other Wiring Installation Contractors	\$228,721	238210	6	282
Site Preparation Contractors	\$177,506	238910	7	114
All Other Specialty Trade Contractors	\$1,287,443	238990	7	107
Wilmington DTC Maintenance Building - PE - \$3,104,000				
Engineering Services	\$3,104,000	541330	11	223

(1) Information obtained from DelDOT DBE Directory

(2) Information obtained from US Census Bureau 2022 data (County Business Patterns)

Figure 2 shown below depicts the calculation of the goal (weighted base figure) using the 3-step method.

Figure 2

Step 1A: All reasonably anticipated FTA-assisted contracting opportunities are identified as:

NAICS Code	Description of Work	Amount of Federal Funds on Project	% of Total DOT Funds (weight)
541330	Engineering Services	\$3,488,000	24%
238110	Poured Concrete Foundation and Structure Contractors	\$382,868	3%
238120	Structural Steel and Precast Concrete Contractors	\$608,179	4%
238140	Masonry Contractors	\$600,047	4%
238220	Plumbing, Heating and Air Conditioning Contractors	\$1,748,273	12%
238210	Electrical Contractors and Other Wiring Installation Contractors	\$768,314	5%
238910	Site Preparation Contractors	\$1,488,838	10%
238990	All Other Specialty Trade Contractors	\$5,536,215	38%
	Totals	\$14,620,734	100%

Step 1B: Determine the relative availability of DBEs by NAICS Code

NAICS Code	Description of Work	Number of DBEs Available To Perform Work	Number of ALL Firms Available (including DBEs)	Relative Availability
541330	Engineering Services	11	223	0.0493
238110	Poured Concrete Foundation and Structure Contractors	5	49	0.1020
238120	Structural Steel and Precast Concrete Contractors	3	16	0.1875
238140	Masonry Contractors	3	65	0.0462
238220	Plumbing, Heating and Air Conditioning Contractors	1	335	0.0030
238210	Electrical Contractors and Other Wiring Installation Contractors	6	282	0.0213
238910	Site Preparation Contractors	7	114	0.0614
238990	All Other Specialty Trade Contractors	7	107	0.0654
	Totals	43	1191	0.03610

Step 1C: (Weight) X (Availability) = Weighted Base Figure

NAICS Code	Description of Work	Weight	Relative Availability	Weighted Base Figure
541330	Engineering Services	0.2386	0.0493	0.0118
238110	Poured Concrete Foundation and Structure Contractors	0.0262	0.1020	0.0027
238120	Structural Steel and Precast Concrete Contractors	0.0416	0.1875	0.0078
238140	Masonry Contractors	0.0410	0.0462	0.0019
238220	Plumbing, Heating and Air Conditioning Contractors	0.1196	0.0030	0.0004
238210	Electrical Contractors and Other Wiring Installation Contractors	0.0525	0.0213	0.0011
238910	Site Preparation Contractors	0.1018	0.0614	0.0063
238990	All Other Specialty Trade Contractors	0.3787	0.0654	0.0248
	Total			0.05663
				Expressed as a % (*100)
				5.72%
				Rounded Weighted Base
				6%

Step 2. Determining if an adjustment is needed – 49 CFR §26.45(d)

After establishing the base figure at **6%**, DTC considered past participation to determine whether any adjustment was needed to the base figure to determine its overall DBE goal and to make it as precise as possible.

The United States Department of Transportation (USDOT's) "Tips For Goal-Setting" suggests that agencies should examine data on past DBE participation in their USDOT-funded contracts in recent years. USDOT further suggests that agencies should choose the median level of annual

DBE participation for those years as the measure of past participation. DTC's past DBE participation (5 years) is reflected in Figure 3.

FIGURE 3

Federal Fiscal Year	Total Federal Participation	Awards to DBE Firms in Dollars (RC)	Awards to DBE Firms in Dollars (RN)	Total DBE Awards	DBE Participation
FFY20	\$3,284,905	\$184,860	\$0	\$184,860	5.63%
FFY21	\$2,856,030	\$248,352	\$0	\$248,352	8.70%
FFY22	\$432,259	\$0	\$424,350	\$424,350	98.17%
FFY23	\$6,296,405	\$241,818	\$943	\$242,761	3.86%
FFY24	\$2,264,705	\$16,506	\$613,352	\$629,858	27.81%

If DTC were to average the Step One weighted goal of 5.72% with the historical median of 8.70%, the result would be $(5.72 + 8.7)/2 = 7\%$. Since the resultant adjusted figure is within one percent of the step one base figure DTC has decided that an adjustment to the base figure is not warranted.

Race-Neutral Program Measures – 49 CFR §26.51(c)

To calculate the race neutral and race conscious split of the overall goal, DTC analyzed our race neutral and race conscious achievements over the past five years. FTA recommends calculating the median of past achievements to determine the split. Using the median of past race-neutral participation, the expected race-neutral participation rate is **1%** (See Figure 4 below).

Figure 4

Federal Fiscal Year	Total Federal Participation	Awards to DBE Firms in Dollars (RC)	Awards to DBE Firms in Dollars (RN)	Total DBE Awards	DBE Participation	RC %	RN %
FFY20	\$3,284,905	\$184,860	\$0	\$184,860	5.63%	100.00%	0.00%
FFY21	\$2,856,030	\$248,352	\$0	\$248,352	8.70%	100.00%	0.00%
FFY22	\$432,259	\$0	\$424,350	\$424,350	98.17%	0.00%	100.00%
FFY23	\$6,296,405	\$241,818	\$943	\$242,761	3.86%	99.61%	0.39%
FFY24	\$2,264,705	\$16,506	\$613,352	\$629,858	27.81%	2.62%	97.38%

DTC is anticipating that by taking the following steps, we will see an increase in the race-neutral DBE participation:

- The DBE Program Analyst will identify advertising opportunities for future RFPs that would assist in making bidding opportunities readily available to a diverse audience.
- DTC will be utilizing mailing lists to assist DBEs/small businesses with DTC contract opportunities. This will assist those who do not monitor the typical websites/publications for bidding opportunities.
- Development of a more prominent space on DTC's website for DTC procurements and DBE information.

- Ensuring participants at pre-proposal meetings are informed of DTC's DBE Program.

DTC's DBE Program Analyst will continue to attend various outreach events (County Open For Business meetings, Chamber of Commerce events, Women's Leadership Conference, DelDOT's DBE & Small Business Development Summit, Latino Summit, etc.) when they are available.

Public Participation & Published Notices – 49 CFR §26.45(g) and 26.15(b)(1)

The public is advised that DTC will be accepting comments on this methodology until 4:30 pm on Thursday, July 24, 2025. The public is invited to provide feedback in one of the following ways:

- Via email at Debbie.erhart@delaware.gov, or
- Through regular mail to Delaware Transit Corporation, ATTN: Debbie Erhart, 119 Lower Beech Street, Wilmington, DE 19805

The DBE Goal and Goal Setting Methodology has been published on DTC's website (www.DARTFirstState.com).