

# **VIRGINIA DEPARTMENT OF TRANSPORTATION**

## **TRIENNIAL DBE OVERALL GOAL SUBMISSION**

**October 1, 2017 – September 30, 2020**

This document constitutes the Virginia Department of Transportation submission of its Disadvantaged Business Enterprise (DBE) Overall Goal Setting Methodology Report to the United States Department of Transportation, Federal Highway Administration (FHWA) for Federal Fiscal Year (FFY) 2018, FFY 2019, and FFY 2020.

# VIRGINIA TRIENNIAL DBE OVERALL GOAL SETTING METHODOLOGY

2018 – 2020

(Federal Fiscal Years, October 1 – September 30)

## EXECUTIVE SUMMARY

The Virginia Department of Transportation (VDOT) submits this report to the Federal Highway Administration (FHWA) for the review and approval of the 2018 – 2020 Triennial Disadvantaged Business Enterprise (DBE) Overall Goal of 10.87%. This goal includes a race/gender-conscious projection of 7.42% and a race/gender-neutral projection of 3.45%. VDOT shall make good faith efforts to meet the overall DBE goal each year during the triennial period. This report was constructed based on the best available information from VDOT, as well as government-published secondary data.

The goal was derived in the following manner:

- A base goal of 13.46% was computed;
- An adjustment to the base goal was made taking into consideration the median past participation of 8.27%; thereby reducing the base goal to 10.87%.
- The maximum portion of the adjusted goal is 7.42% which is race/gender-conscious and the race-gender-neutral portion of the adjusted goal is 3.45%.

### Background

VDOT, as a recipient of the United States Department of Transportation (DOT) Financial Assistance Program, is required to establish and submit a triennial DBE overall goal for contract participation by disadvantaged business enterprises (DBEs), based on demonstrable evidence of the availability of ready, willing and able DBEs relative to all businesses that are ready, willing and able to participate on DOT-assisted contracts. This process begins with the determination of a base figure for the relative availability of DBEs and then, based on evidence, a determination of whether the base figure requires adjustments to arrive at the overall goal. VDOT's goal setting methodology is in compliance with these requirements.

### Methodology and Data Sources

The calculations to determine the base figure are made in order to measure the relative availability of DBE firms or firms that could be certified as DBE firms to perform the types of prime and subcontract work that VDOT contracts. The methodology used determines the percentage of DBE firms that are ready, willing and able to respond to solicitations for the types of work that VDOT will be performing during the 2018 – 2020 federal fiscal years (FFYs).

VDOT considered the methods recommended in the amended 49 CFR 26.45 (c) and The "Tips for Goal-Setting in the Disadvantaged Business Enterprise (DBE) Program" in the establishment of a base figure: the use of the DBE Directory, U.S. Census Bureau Data, Bidders Lists, Disparity Studies, the Goal of Another DOT Recipient, and Alternative Methods. VDOT determined that the appropriate methodology was to use the DBE Vendor Directory of the Virginia Unified Certification Program, the Virginia Small, Women and Minority-owned (SWaM) Vendor Directory, Maryland Department of Transportation's Office of Minority Business Enterprise Directory of Certified Firms, Maryland e-Marketplace, the U.S.

Census Bureau’s Economic Census Data, and VDOT’s Bidders List data to determine the base figure. The information utilized from the U.S. Census Bureau’s Economic Census Data consisted of data for firms located throughout Virginia and six cities/counties in Maryland, NAICS codes, minority status and female gender.

**Consultation and Publication to Facilitate Public Input**

A public notice of the proposed DBE Overall Goal of 10.87% was published in twelve publications and on VDOT’s public website for the purpose of soliciting comments and public input. A draft of this document was also forwarded to DBE stakeholder organizations. VDOT’s staff and industry contacts, attended a presentation of the document and a discussion of the overall goal setting methodology at a Virginia Transportation Construction Alliance meeting in Colonial Heights, Virginia, and two public forums were conducted at VDOT’s Central Office in Richmond, Virginia.

**STEP ONE - BASE FIGURE CALCULATIONS**

**Determination of the Local Market Area**

In FFYs 2014 – 2016, VDOT’s total expenditures were \$4,383,924,778 in five (5) major categories of work: construction, professional services, other services, supplies, and transportation of materials.

**FFY 2014 – 2016 Federally Funded Contract Expenditures by Industry Classification**

<b>Industry Classification</b>	<b>Total Dollars Expended</b>	<b>Percent</b>
Construction	\$ 3,304,604,506	75.38
Professional Services	\$ 874,787,023	19.95
Other Services	\$ 20,163,124	0.46
Supplies	\$ 144,653,767	3.30
Transportation of Materials	\$ 39,716,358	0.91
Total	\$ 4,383,924,778	100.00

Expenditures for construction and professional services represented 95.33% of all expenditures; this indicates that construction and professional services are the primary industries to use in determining the local market area for VDOT.

In determining the market area for VDOT, an analysis was conducted of the substantial majority of all contractors and subcontractors with which VDOT did business with during FFYs 2014 – 2016, as well as where the substantial majority of VDOT’s contract dollars were being spent.

For FFYs 2014 – 2016, \$3,304,604,506 was expended by VDOT to 590 firms (primes and subcontractors) in the construction industry. Seventy four and six hundred thousandths percent (74.60%) of the contract expenditures (\$2,465,182,579) went to 426 Virginia-based firms, which represented 72.20% of the 590 firms that received contract awards. Since Virginia did not meet the 75% minimum threshold in either total expenditures or the number of firms receiving contracts, more states were considered for inclusion into VDOT’s local market area. Three other states (Maryland, North Carolina

and Pennsylvania) were considered for inclusion into Virginia’s market area. Even though Connecticut firms did receive the next largest percentage of contract expenditures (\$215,495,375) following those of Virginia firms, Connecticut firms comprised only 1.19% of the total number of firms doing business with VDOT. However, when combining Connecticut with the Virginia’s 72.20%; that combination was not enough to constitute a market area. Since only one of the three states under consideration for inclusion into VDOT’s market area was needed to satisfy the 75% minimum threshold in both the number of firms and expenditures, it was decided to combine the percentage of expenditures with the percentage of firms for each of the three states and select the state with the highest number (Maryland = 6.02% +7.97% = 13.99%, Pennsylvania = 4.85% + 8.14% = 12.99%, North Carolina = 2.24% + 3.39% = 5.63%). Based upon the aggregate of the percentage for contract expenditures and the number of firms receiving contracts for VDOT work, Maryland was selected for inclusion into VDOT’s market area along with Virginia. Combined, firms throughout Virginia and in six counties and one city in Maryland (Baltimore City and Baltimore, Montgomery, Prince George’s, Anne Arundel, Worcester and Carroll Counties) comprised 80.17% of the total number of construction industry firms doing business with VDOT. This combination also represented 80.62% of the contract expenditures which is above the 75% threshold both in expenditures and in the number of firms to establish a construction industry market area for VDOT.

### FFYs 2014 – 2016 Construction Contract Expenditures

State	Total Construction (Prime & Sub)	Total Vendors	% of Expenditures	% of Firms
VA	\$2,465,182,579.12	426	74.60%	72.20%
CT	\$215,495,374.50	7	6.52%	1.19%
MD	\$198,933,303.43	47	6.02%	7.97%
PA	\$160,282,161.65	48	4.85%	8.14%
NC	\$74,019,263.94	20	2.24%	3.39%
MI	\$56,572,779.23	2	1.71%	0.34%
WV	\$54,016,111.99	10	1.63%	1.69%
TN	\$39,151,636.33	1	1.18%	0.17%
OH	\$24,107,965.84	14	0.73%	2.37%
FL	\$10,206,060.40	7	0.31%	1.19%
GA	\$2,109,903.94	0	0.06%	0.00%
MA	\$1,722,637.32	1	0.05%	0.17%
KY	\$1,714,770.43	1	0.05%	0.17%
SC	\$906,236.05	2	0.03%	0.34%
DC	\$183,721.50	4	0.01%	0.68%
<b>Grand Total</b>	<b>\$3,304,604,505.67</b>	<b>590</b>	<b>100.00%</b>	<b>100.00%</b>

For FFYs 2014 – 2016, \$874,787,023 dollars were expended by VDOT to 567 firms for professional services. Sixty two and one hundred one thousandths (62.01%) of the contract expenditures (\$542,460,524) went to 176 Virginia-based firms which represented 79.89% of the 567 firms; thereby exceeding the 75% threshold to establish the local market area as Virginia in the number of firms doing business with VDOT in the professional services industry. Although professional services firms from the state of Connecticut made up 30.92% of the expenditures in the industry category, professional services firms from the state of Connecticut were working on large, atypical design-build contracts for VDOT which are not expected to be similar during this triennial. States other than Virginia and Connecticut had

substantially fewer numbers of firms working on VDOT projects and substantially fewer contract dollars than those of Virginia firms. Therefore, it was determined that Virginia comprised the local market area in the professional services industry classification based upon the percentage of firms (79.89%) receiving contracts for FFYs 2014 – 2016.

### FFYs 2014 – 2016 Professional Services Expenditures

State	Total Professional Service (Prime & Sub)	Total Vendors	% of Expenditures	% of Firms
VA	\$542,460,523.87	453	62.01%	79.89%
CT	\$270,510,964.00	47	30.92%	8.29%
MD	\$47,594,586.34	25	5.44%	4.41%
NC	\$222,015.99	19	0.03%	3.35%
GA	\$324,148.00	9	0.04%	1.59%
FL	\$1,446,401.44	3	0.17%	0.53%
KY	\$3,556,256.50	3	0.41%	0.53%
SC	\$1,358,605.00	3	0.16%	0.53%
DC	\$2,083,104.06	2	0.24%	0.35%
PA	\$832,820.08	1	0.10%	0.18%
WA	\$3,809,559.00	1	0.44%	0.18%
NJ	\$588,038.51	1	0.07%	0.18%
<b>Grand Total</b>	<b>\$874,787,022.79</b>	<b>567</b>	<b>100.00%</b>	<b>100.00%</b>

Combined, the total dollars expended by VDOT for the construction and professional services industries in FFYs 2014 – 2016 was \$4,179,391,528.46, of which 79.07% was expended in the construction industry and 20.93% was expended in the professional services industry.

For future triennial goal analyses, VDOT is working to capture expenditures and firm data by NAICS codes in order to minimize manual determination of contract and expenditure categories.

### NAICS Codes Considerations and Weighted Calculations

In order to use the relevant industry and demographic data from the U.S. Census Bureau in the Step One Base Figure calculations, VDOT focused upon the primary NAICS codes used in its Construction and Professional Services industries contract work. The primary NAICS codes/descriptions and the category of work types used for VDOT contracts are as follows:

Category	NAICS Code	NAICS Code Description
Construction	237310	Highway, Street and Bridge Construction
	561730	Landscaping Services
	238210	Electrical Contractors and Other Wiring Installation Contractors

	237110	Water and Sewer Line and Related Structures Construction
	238210	Site Preparation
Professional Services	541330	Engineering Services
	541370	Surveying and Mapping (except Geophysical) Services

Although NAICS codes/descriptions are typically utilized by VDOT when considering DBE participation, the U. S. Census Bureau, and in general, the Federal Government, it should be noted here that some of the sources utilized (the Virginia Small, Women and Minority-owned (SWaM) Vendor Directory, the Maryland e-Marketplace and VDOT’s Bidders List) do not utilize NAICS codes. However, the industry classifications for the firms not represented by NAICS codes have been manually converted to NAICS codes so that the aggregate data from those sources could be utilized in these calculations. It should also be noted here that, although most of the firms used in the calculations have more than one NAICS codes, the most relevant code for each firm was manually chosen, and each firm is represented in the calculations only once with one relevant NAICS code.

### Total Weighted Calculations by Category

The potential number of DBE firms in the construction industry in VDOT’s local market area, which is comprised of the total number of minority-owned and female-owned construction firms in Virginia, (statewide) and six counties and one city in Maryland, is 984. The total number of firms in these locations, regardless of ownership status, is 7,140. When the potential number of DBE firms is divided by the total number of firms, the relative availability of DBEs for the construction industry in VDOT’s local market area is 13.78%. When multiplied by the percentage of dollars expended by VDOT in FFYs 2014 – 2016, the total weighted calculation for the construction industry category is 10.87%.

The potential number of DBE firms in the professional services industry in VDOT’s local market area, which is comprised of the total number of minority-owned and female-owned construction firms in Virginia (statewide), is 257. The total number of firms in these locations, regardless of ownership status, is 2,216. When the potential number of DBE firms is divided by the total number of firms, the relative availability of DBEs for the professional services industry in VDOT’s local market area is 11.60%. When multiplied by the percentage of dollars expended by VDOT in FFYs 2014 – 2016, the total weighted calculation for the professional services category is 1.69%.

When the total weighted calculations for the Construction and Professional Services Industries Categories are added together, the total Step One Base Calculation for VDOT is **13.46%**, with the calculations indicated in Table I and as follows:

$$((984 \text{ Potential DBE Firms} / 7,140 \text{ Construction Firms}) \times .8547) = 10.87\%$$

$$((257 \text{ Potential DBE Firms} / 2,216 \text{ Professional Services Firms}) \times .1453) = 1.69\%$$

**Total Step One Base Calculation** 13.46%

The construction and professional services industry type categories were used as a basis to calculate a weighted percentage for each work type category, with a resultant aggregate percentage of **13.46%** for the Step One Base Figure calculation. Table I indicates the source of the data and the calculations utilized.

**Table I**  
**Step One Base Figure: Weighted Statistics of DBE firms Ready, Willing, and Able to Perform Work for VDOT**

**STEP ONE BASE CALCULATIONS**

(Column B)			Virginia Firms*				Maryland Firms**				Total All States						
			(Column E)	(Column G)	(Column I)	(Column K)	(Column M)	(Column O)	(Column Q)	(Column S)	(Column U)	(Column V)					
Industry Category	% of Dollars Expended by VDOT in FFYs 2014 - 2016 (VDOT Data)	Primary NAICS Code/Descriptions Utilized for VDOT Projects	Number of Firms (statewide)	Number of Minority-owned Firms	Number of Women-owned Firms	Total of Minority-owned and Women-owned Firms	Number of Firms (Anne Arundel, Baltimore, Carroll, Montgomery, Prince George's And Worcester Counties, and Baltimore City)	Number of Minority-owned Firms	Number of Women-owned Firms	Total of Minority-owned and Women-owned Firms	Relative Availability of DBEs in Virginia and Maryland ((Column K + Column S) / (Column E + Column M))	Total Weighted Calculations by Category in Virginia and Maryland (Column B x Column U)					
Construction	85.47%	237110 Water and Sewer Line and Related Structures Construction	391	9	8	17	121	70	10	80	13.78%	11.78%					
		237310 Highway, Street, and Bridge Construction	582	180	142	322	173	79	20	99							
		238210 Electrical Contractors and Other Wiring Installation Contractors	1836	31	339	7	234	38	573	340			1111	20	5	25	411
		238910 Site Preparation Contractors	867	49	36	85	276	86	19	105							
		561730 Landscaping Services	2353	70	41	111	201	82	20	102							
Professional Services	14.53%	541330 Engineering Services	1512	119	52	171					11.60%	1.69%					
		541370 Surveying and Mapping (except Geophysical) Services	245	10	10	20											
		541380 Testing Laboratories	165	5	9	14											
		541620 Environmental Consulting Services	294	20	32	52											
			8245	493	337	830	1111	0	0	411	<b>13.46%</b>						

**Step One Base Figure Calculation is 13.46%**

\* Virginia DBE Directory, Virginia SWaM Directory, VDOT Bidders' List, 2012 U. S. Census Statistics for Firms by Industry

\*\*Maryland DBE Directory, Maryland eMarketplace Directory

**STEP TWO – ADJUSTMENT CALCULATIONS**

In order to adjust VDOT’s Step One Base Figure to make it as precise as possible, all available evidence in VDOT’s jurisdiction was evaluated to determine whether any adjustments were necessary. Considerations included past participation and bidders’ lists. It was concluded that past participation data would be utilized to accomplish the needed adjustment to the Base Figure calculation from Step One.

**Median Past Participation**

The median past participation for fiscal years 2009 - 2016 was determined to be **8.27%**, as indicated in the following table:

**Table II  
Determining the Median Past Participation**

<b>Fiscal Years</b>	<b>Federal Dollars</b>	<b>DBE Commitments</b>	<b>Percentage</b>	<b>Calculation of Median Value Percentage</b>
2009 - 2010	807,409,324	66,752,846	8.27%	6.17%
2010 - 2011	1,255,758,733	146,968,001	11.70%	6.29%
2011 - 2012	978,347,107	103,572,492	10.59%	6.72%
2012 - 2013	1,018,504,942	68,445,496	6.72%	8.27%
2013 - 2014	1,005,685,152	113,273,589	11.26%	10.59%
2014 - 2015	950,162,471	58,601,531	6.17%	11.26%
2015 - 2016	939,597,950	59,085,631	6.29%	<u>11.70%</u>
				<b>8.27%</b>

**Step Two Adjustment with Median Past Participation**

When averaged together, the Step One Base Figure (13.46%) and the median past participation figure (8.27%) equal the adjusted step two figure of 10.87%.

$$((13.46\% + 8.27\%)/2) = \mathbf{10.87\%}$$

**CALCULATING THE RACE/GENDER-NEUTRAL AND RACE/GENDER-CONSCIOUS SPLIT**

The race/gender-neutral and race/gender-conscious division of the overall goal is a vital component of the DBE goal setting process. VDOT intends to meet the maximum feasible portion of the overall goal by using a combination of race/gender-neutral and race/gender-conscious DBE participation. Following is the basis of VDOT’s projections of the level of achievement of race/gender-neutral and race/gender-conscious participation and the supporting data.

The percentages by which VDOT’s contractors exceeded the aggregate of the specific project goals for



FFYs 2009 – 2016 goals with contract commitments along with the race/gender-conscious and race/gender-neutral values for each fiscal year are documented in Table III - VDOT Federal-Aid Contracts, FY 2009 - 2010 through FY 2015 – 2016.

The Virginia Overall DBE Goal for FFY 2018 - 2020 is **10.87%**, consisting of 7.42% race/gender-conscious and 3.45% race/gender-neutral DBE participation.

The calculations are as follows:

<b>Virginia Overall DBE Goal for FFY 2018 – 2020</b>		<b>10.87%</b>
<b>Race/gender-neutral DBE goal</b>	<b>-</b>	<b><u>3.45%</u></b>
<b>Total race/gender conscious goal</b>		<b>7.42%</b>

**Table III**  
**VDOT FEDERAL-AID CONTRACTS**  
**FY 2009 - 2010 THROUGH FY 2015 - 2016**

<b>FISCAL YEARS</b>	<b>TOTAL FHWA CONTRACT DOLLARS (Prime Contracts)</b>	<b>TOTAL DBE COMMIT DOLLARS</b>	<b>TOTAL COMMIT %</b>	<b>R/C COMMIT DOLLARS</b>	<b>R/C COMMIT %</b>	<b>R/N COMMIT DOLLARS</b>	<b>R/N COMMIT %</b>
2009-2010	\$807,409,324	\$66,752,846	8.27%	\$38,934,652	4.82%	\$27,818,194	3.45%
2010-2011	\$1,255,758,733	\$146,968,001	11.70%	\$82,107,808	6.54%	\$64,860,193	5.17%
2011-2012	\$978,347,107	\$103,572,492	10.59%	\$35,803,578	3.66%	\$67,768,914	6.93%
2012-2013	\$1,018,504,942	\$68,445,496	6.72%	\$37,192,840	3.65%	\$31,252,656	3.07%
2013-2014	\$1,005,685,152	\$113,273,589	11.26%	\$31,356,886	2.64%	\$81,836,023	8.14%
2014-2015	\$950,162,471	\$58,601,531	6.17%	\$33,543,887	3.53%	\$25,057,645	2.64%
2015-2016	\$939,597,950	\$59,085,631	6.29%	\$35,775,959	3.81%	\$7,231,932	0.77%
<b>TOTAL</b>	<b>\$6,955,465,679</b>	<b>\$616,699,586</b>		<b>\$294,715,610</b>		<b>\$305,825,557</b>	
<b>MEDIAN</b>	<b>\$978,347,107</b>	<b>\$68,445,496</b>	<b>8.27%</b>	<b>\$35,803,578</b>	<b>3.66%</b>	<b>\$31,252,656</b>	<b>3.45%</b>

## PUBLIC PARTICIPATION

### Public Participation Schedule

- May 1 – June 28, 2017: public participation via consultation, teleconference and forums with stakeholders conducted.
- June 19, 2017: draft of overall goal setting methodology posted on VDOT’s website.
- July 24, 2017: final date for receipt of any comments received (summarized in the public comment section below of this document)
- August 1, 2017: deadline for document submittal to the FHWA.

### Public Consultation and Forums

The regulations require that VDOT provide for consultation and public participation when establishing its overall goal. VDOT scheduled industry forums began June 1, 2017 to gather information for its 2018 – 2020 DBE overall goal methodology submission. Members from the public were invited to attend the forums, which included women and minority-owned business owners and representatives from the following organizations: Virginia Transportation Construction Alliance, Old Dominion Highway Contractors Association, Transportation DBE Advisory Committee, American Council of Engineers of Virginia, Central Virginia Business & Construction Association, National Society of Black Engineers, Virginia Beach Minority Business Council, Northern Virginia Black Chamber of Commerce, Metropolitan Business League, Virginia Hispanic Chamber of Commerce, and the Central Virginia African American Chamber of Commerce, and the Women’s Transportation Seminar (WTS).

The forums provided the opportunity to present to the attendees with a brief overview of the DBE program that led into discussions concerning evidence regarding the lingering effects of past discrimination, VDOT’s efforts to establish a level playing field for DBEs, the availability of disadvantaged and non-disadvantaged businesses to work on federally funded contracts, and the current triennial overall DBE goal methodology.

### Public Consultation and Forums Schedule

Date	Event	Location
June 1, 2017	Transportation Disadvantaged Business Enterprise Committee (TDAC) Forum	VDOT Richmond District Auditorium, 2400 Pine Forest Drive, Colonial Heights, Virginia
June 8, 2017	Stakeholders Public Forum	VDOT Central Office Human Resources Training Room, 1221 East Broad Street, Richmond, Virginia
June 28, 2017	Public Forum	VDOT Central Office Human Resources Training Room, 1221 East Broad Street, Richmond, Virginia

## Results of the Public Consultation and Forums

Some of the key topics that were discussed included:

Topic	Response
How VDOT assigns DBE goals to individual contracts.	The itemized estimates are reviewed by VDOT's Civil Rights Division for each project along with a list of DBE firms and their respective NAICS and VDOT work task codes to determine the potential DBE contract amount and assigned DBE goal percentage before the contracts are advertised by VDOT and its locality partners.
The importance of maintaining certifications with regard to receiving notifications about pending contract opportunities.	DBE certifications <u>must</u> be maintained in order to fully reap the benefits of the DBE program, not only with regard to advertisements for upcoming projects, but also with regard to being ready to talk business when approached with an opportunity where DBE status is required.
Marketing skills for DBE firms.	DBE firms cannot always wait for prime contractors to come to them with potential opportunities, but must be proactive in reaching out toward prime contractors at every opportunity, researching the potential projects and seeking out the potential prime contractors on bidders lists and at project showings.
The reasoning for omitting North Carolina from the Step One Base calculations.	North Carolina data was utilized in the previous 2015-2017 triennial DBE overall goal because it was included in VDOT's local market area along with Virginia, making up at least 75% of where VDOT spent its construction industry dollars. For the analysis for this triennium, Maryland and Virginia fulfilled the requirements of the local market area for VDOT's construction industry classification.

VDOT has effectively engaged in public outreach and has provided an opportunity for business owners, industry associations, and community groups to participate in discussions relevant to the goal setting process and reasonably considered the comments and questions received. Therefore, VDOT believes that the proposed triennial overall DBE goal for 2018 – 2020 of 10.87% accurately reflects the ready, willing, and able DBE firms for participation on federally funded contracts.

## PUBLIC NOTICE

### **Virginia Department of Transportation Disadvantaged Business Enterprise (DBE) Overall Triennial Goal on FHWA-Funded Projects For Fiscal Years October 1, 2017 – September 30, 2020**

The Virginia Department of Transportation (VDOT) as required by the U.S. Department of Transportation's regulations, contained under 49 CFR Part 26, announces the proposed Disadvantaged Business Enterprise triennial goals for contractible opportunities administered through VDOT and funded by the U.S. Department of Transportation (USDOT).

The DBE Triennial Overall Goal is 10.87% of the federal financial assistance to be expended on VDOT contracts and is effective from October 1, 2017 – September 30, 2020. The race/gender-conscious portion of the goal is 7.42% and the race/gender-neutral portion of the goal is 3.45%. The DBE overall goal is based upon demonstrable evidence of the availability of ready, willing, and able DBEs relative to all businesses ready, willing, and able to participate on DOT-assisted contracts.

The methodology used in establishing the overall goal will be available for review, inspection, and comment until **July 24, 2017** at <http://www.virginiadot.org/business/bu-civil-rights-home.asp> and at the following address from 9:00 a.m. – 4:00 p.m.:

Sharon Plymire  
Virginia Department of Transportation  
Civil Rights Division  
1401 East Broad Street  
Richmond, Virginia 23219

All comments and any questions should be sent to Sharon Plymire by email at [sharon.plymire@vdot.virginia.gov](mailto:sharon.plymire@vdot.virginia.gov) or by phone at 804-786-4441.

#### **Notice of the Proposed DBE Overall Triennial Goal for FFY 2018 – 2020**

The notice was posted on the VDOT website beginning June 19, 2017 at <http://www.virginiadot.org/business/bu-civil-rights-home.asp>, and in the following publications on June 22-23, 2017 for a 30-day minimum comment period:

- Bristol Herald
- Alexandria Metro Herald
- Arlington Sun Gazette
- Daily Press
- El Tiempo
- Fredericksburg Free Lance-Star
- Norfolk New Journal & Guide
- Richmond Free Press
- Richmond Times-Dispatch

- Roanoke Times
- Virginian-Pilot
- Washington Post

In accordance with 49 CFR §26.45, VDOT issued a public notice announcing VDOT's overall DBE goal and informed the public that the proposed goal and its rationale were available for inspection and comment during normal business hours at VDOT's principal office for 30 days following the date of the notice and that VDOT and the Federal Highway Administration (FHWA) would accept comments regarding the goal for 30 days from the date of posting of the public notice. The notice included addresses to which comments could be sent and was published in general circulation media and available minority-focused media. Notices were also sent to several business owners and organizations which are directly or indirectly associated with the DBE program in Virginia.