



Disadvantaged Business Enterprise (DBE) Program Goal for Federal Transit Administration Funds

Proposed Three (3) Year DBE Goal: 0.82%

Federal Fiscal Years (FFY) 2026-2028
(October 1, 2026 – September 30, 2028)

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Purpose of this Document:

The Carson Area Metropolitan Planning Organization (CAMPO) in partnership with the Carson City Regional Transportation Commission (RTC) are committed to carrying out all of the Disadvantaged Business Enterprise (DBE) requirements of 49 CFR Part 26, which provides guidelines to assure that all contracts and procurements are administered without discrimination on the basis of race, color, sex, or national origin, and DBEs have an equal opportunity to compete for and participate in the performance of all agreements, contracts, and subcontracts awarded by CAMPO and RTC.

49 CFR Part 26 Section 45 defines a three-year goal setting method for recipients of Federal Transit Administration (FTA) funds. The purpose of this goal is to provide a guideline for FTA funding recipients to ensure nondiscrimination in the award and administration of Department of Transportation (DOT)-assisted contracts, to create a level playing field on which DBE's can compete fairly for DOT-assisted contracts, and to provide appropriate flexibility to recipients of Federal financial assistance in establishing and providing opportunities for DBEs.

Furthermore, in the process of establishing this goal and methodology, CAMPO seeks to educate existing DBEs and potential DBE certification applicants on participation in the DBE program and potential contracting opportunities.

Adopted/Amended:

July 2025 – Adoption of 3-year DBE Program Goal

PART 1 – ESTABLISHMENT OF DBE GOAL

1.0 CAMPO DBE 3-Year Goal for FFY 2026 through FFY 2028

1.1 Federal Transit Administration (FTA) regulations dictate that recipients of FTA funding must create a three (3) year goal in accordance with 49 CFR Part 26.

1.2 In alignment with 49 CFR Part 26, CAMPO has determined a DBE 3-year race neutral goal of **0.82%**. This goal is expressed as a percentage of FTA funds (excluding FTA funds to be used for the purchase of transit vehicles) that are allocated through CAMPO. The goal reflects an anticipated level of DBE participation in FTA-assisted contracts in the three forthcoming fiscal years. The new goal has decreased from the previous 3-year goal based on a lower overall project budget, as well as an increase to individual projects with no available DBE's, such as the transit operating contract.

2.0 Data Collection and Analysis

2.1 Annual FTA apportionment funding available to CAMPO was established in the Infrastructure Investment and Jobs Act (IIJA) in 2022. Future funding is estimated using American Association of State Highway and Transportation Officials (AASHTO) projections of a 2.5% increase from FFY 2025 – 2026 and a flat 2% increase for the following years. FTA Section 5307 funding allocated to CAMPO per Federal Fiscal Year (FFY) is anticipated to be:

- \$2,484,748 in FFY 2026
- \$2,534,443 in FFY 2027
- \$2,585,131 in FFY 2028

Additional discretionary funding through FTA Section 5310 which supports enhanced mobility of seniors and individuals with disabilities is typically awarded to CAMPO each year based on population. The estimated amounts for the next three fiscal years (based on a 2.3% increase from FFY 2025 – 2026, and a flat 2% increase thereafter) is:

- \$222,967 in FFY 2026
- \$227,426 in FFY 2027
- \$231,975 in FFY 2028

The amounts listed in this section do not include additional discretionary grants or any local matching funds.

2.2 CAMPO annually awards FTA funding to eligible Transit Operators and Contractors within its planning area. Jump Around Carson (JAC) Transit currently holds an Operating Service Contract for public transit within the MPO area and may regularly undertake projects to enhance transit services. Table 1 provides a list of anticipated DOT-assisted projects and estimated cost, by industry classification.

**Table 1 – Anticipated Projects and Expenditures by Trade Classification
FFY 2026-2028**

Project Type	NAICS Code	NAICS Description	Dollar Amount	% of Total
Operating	485113	Transit Operators	\$5,385,000	81.52%
Bus and Bus Facility Upgrades – Bus Stop Signing and Solar Lighting	339950	Traffic Signs Manufacturing	\$47,000	0.71%
	335132; 238210	Street Lighting Vendors; Electrical contractors	\$307,000	4.65%
Bus and Bus Facility Upgrades – Downtown Transit Center	236220	General Construction	\$223,000	3.38%
	238210	Electrical Contractor	\$25,000	0.38%
Bus and Bus Facility – Admin Parking Lot	238990	Asphalt coating and sealing, residential and commercial parking lot and driveway	\$150,000	2.27%
Bus and Bus Facility Sidewalk and Bus Stop Construction	237310; 484220	Streets, Roads, Public Sidewalks, Construction; Specialized Freight (except Used Goods) Trucking, Local	\$300,000	4.54%
Software – CAD/AVL Computer Software	423430	Computer Software, packaged, merchant wholesalers	\$55,000	0.83%
Software – Vehicle Cameras	561621	Security system monitoring services	\$65,000	0.98%
Professional Services – Public Outreach	541820	Public Relations Agencies	\$49,000	0.74%
Total			\$6,606,000	

CAMPO commonly sees DBE certified trucking companies being used by larger non-DBE general contractors for the construction of pedestrian access/sidewalk projects in the region; therefore, the NAICS code (484220) specific to sand and gravel transportation was combined with the general streets and roads construction NAICS code (237310) for the purposes of the project calculation.

2.3 To calculate the DBE goal, two geographical market areas were utilized to ensure a reasonable and relevant representation for the anticipated project types. The geographical market for construction contractors includes the five (5) jurisdictions of Carson City a Consolidated Municipality, Douglas County, Lyon County, Storey County, and Washoe County. The market for transit operators and street lighting vendors included the statewide region as companies for these services tend to operate outside and across multiple statewide jurisdictions.

2.4 U.S. Census Bureau data was collected on the nine (9) industry classifications (Table 1) to determine the availability of companies within the relevant geographical market. The data can be found at: <https://factfinder.census.gov/>

2.5 DBE availability for the projects noted in Table 1 was drawn from the Nevada Unified Certification Program (NUCP) records, which is the certifying body for DBE's in Nevada (See Table 2 in Section 3.0). The link to the NUCP database is: <http://nevadadbe.com/dbe-vendors>

The Nevada Department of Transportation (NDOT) updated their DBE goal for FFY 2026-2028 to 10.2% which it expects to meet 2.6% through race-neutral means and 7.6% through race-conscious means. CAMPO's proposed race-neutral goal of 0.82% is found to be reasonable since CAMPO's market area is more focused as compared to NDOT as NDOT funds transit operations in rural areas of the State where DBE participation is more limited.

3.0 Methodology

Table 2 – DBE Availability by NAICS Code and Project Weight

Project	NAICS	Total DBEs	Total Businesses	DBE %	Weighted
Operating	485113	0	0	0	0.00%
Bus and Bus Facility Upgrades – Bus stop signing and Solar Lighting	335132; 238210	3	205	1.46%	0.07%
Bus and Bus Facility Upgrades – Bus stop signing and Solar Lighting	339950	0	16	0.00	0.00
Bus and Bus Facility Upgrades – Downtown Transit Center	236220	1	107	0.93%	0.03%
Bus and Bus Facility Upgrades – Downtown Transit Center	238210	3	205	1.46%	0.01%
Bus and Bus Facility Admin Parking Lot	238990	3	102	2.94%	0.07%
– Bus and Bus Facility Sidewalk and Bus Stop Construction	237310; 484220	10	81	12.35%	0.56%
Software – CAD/AVL Computer Software	423430	0	7	0.00%	0.00%
Software – Vehicle Cameras	561621	0	10	0%	0.00%
Professional Services – Public Outreach	541820	3	26	11.54%	0.09%

3.1 49 CFR Part 26.45 indicates methods for calculating a DBE goal based on a percentage of available DBE firms by industry classification and within the relevant geographical area. Further adjustments will be made after the public comment period is closed and after staff has concluded consultation with DBE stakeholders, as required by 49 CFR Part 26.45(d) and Part 26.45(g)(1).

3.2 Table 2 indicates the percentages of DBE's available in Nevada that could be reasonably expected to submit proposals on upcoming projects funded in whole or in part with FTA funds, in compliance with 49 CFR Part 26.45. The data discussed in Section 2.0 was the basis for these numbers. Furthermore, the table shows weighting for each project based on the percentage of funds CAMPO intends to expend.

3.3 The percentages of total federal funds for expenditure, found in Table 1, are multiplied by the weighted percentages of DBEs for each project as shown in Table 2. The following equation was used to determine the final overall DBE goal of 0.82%

$$(81.52\% * 0.00\%) + (.71\% * 0.00\%) + (4.65\% * 1.46\%) + (3.38\% * .93\%) + (.38\% * 1.46\%) + (2.27\% * 2.94\%) + (4.54\% * 12.35\%) + (.83\% * 0.00\%) + (.98\% * 0.00\%) + (.74\% * 11.54\%) = .0082$$

= Total DBE Goal: 0.82%

4.0 Establishing Race Neutral and Race Conscious Splits

4.1 In keeping with the Ninth Circuit Court of Appeals decision in *Western States Paving v. Washington State Department of Transportation*, CAMPO proposes to set the goal as race-neutral for this goal period. Race-neutral DBE participation includes any time a DBE is awarded a prime contract through customary competitive procurement procedures, is awarded a subcontract on a prime contract that does or does not carry a DBE requirement, or wins a subcontract from a prime contractor that did not consider its DBE status in making the award (e.g., a prime contractor that uses a strict low bid system to award subcontracts).

5.0 Public Participation

5.1 The public comment period for public review of CAMPO's proposed 3-year DBE goal, along with the methodology and calculations, began on June 4, 2025, and finished at the end of the day on July 4, 2025. Individuals with disabilities or other mobility challenges may contact the office below to obtain this document in an accessible format in accordance with JAC's approved Title VI plan. Translated Spanish copies will also be made available upon request. All questions and comments may be directed to Comments@CarsonAreaMPO.com. Members of the public may also contact the JAC Transit Coordinator staff by telephone to 775-283-7583. All comments will be considered for adjustment and establishment of the goal.

5.2 A public meeting for DBE Stakeholders, certified DBE companies, and uncertified DBE eligible companies was held to receive comment on this document and to inform local interest groups on June 16, 2025. A presentation by the DBE Liaison Officer delivered information to attendees on the 3-year goal methodology, DBE Certification requirements, and benefits of the DBE certification. The DBE Liaison discussed the proposed projects mentioned within the DBE plan with the attendees and the scopes of work for those identified projects. Notices and invitations were sent to the following locations and organizations:

- Carson City Chamber of Commerce
- Washoe Tribe of Nevada and California
- Dayton Chamber of Commerce
- Carson Valley Chamber of Commerce
- Local DBE certified companies
- Associated General Contractors of Nevada (AGC)

Attachment 1 – Public Outreach Materials

6.0 Future Updates

6.1 Updates to the DBE goal occur every three years in accordance with federal regulations or when major revisions are necessary for compliance with federal regulations.

PART 2 – DBE PROCEDURES

7.0 Responsibilities

7.1 The DBE liaison for JAC is the Transit Coordinator.

7.2 The DBE liaison, project managers, contract specialists, and document control specialists work together to ensure the required forms and documents are included in federal solicitations that use FTA funds.

7.3 The Senior Document Control Specialist(s) is responsible for tracking payment of contractors and subcontractors completing work on construction projects using the approved forms. Project Managers are responsible for reviewing payment invoices for professional services using the approved forms. Both these positions must keep a running tally of DBE participation within a given project.

8.0 Procurement

8.1 The U.S. Department of Transportation (USDOT) Disadvantaged Business Enterprise (DBE) and Airport Concession Disadvantaged Business Enterprise (ACDBE) program regulations under 49 CFR Part 23 and Part 26 require agencies that use USDOT

federal funding to collect and monitor data related to DBE and non-DBE contractors and subcontractors (and consultants) who submit bids or proposals for agency projects. All contractors and consultants who submit bids or proposals on a project must complete and submit forms at the time bids are due. Specific form for data collection can be found in the CAMPO Policies and Procedures, in the appendix related to FTA Procurements.

8.2 At the time of bid, CAMPO and JAC must collect the following information for all bidders regardless of if the firm is a DBE firm or if the prime firm is using DBE vendors, subcontractors, or subconsultants.

- Name, address and zip code of the firm
- DBE status
- Race and sex of majority owner
- NAICS codes
- Age of firm
- An estimate of gross annual receipts

This bidders list information shall be collected and maintained in the project file. Annually, by December 1st, CAMPO may be required to report the bidders list information to the USDOT using the approved USDOT website for all advertised projects from the past federal fiscal year that used federal transit funding. This includes successful and unsuccessful bidders and proposers.

8.3 For any DBEs proposed on the project, CAMPO and JAC must collect the following for each DBE.

- Name, address and zip code of the firm
- The NAICS codes of the work performed by the DBE
- Contract number of the federally assisted contract
- The dollar value of the contract

These elements are part of the required Uniform Reporting agencies must complete on a semi-annual basis. CAMPO may be required to submit the Uniform Report online once the USDOT established the submittal website.

8.4 Prime firms must complete additional forms if the prime firm is using DBE supplies as dealers or distributors to meet any stated DBE goals. Current forms are included in the CAMPO Policies and Procedures. Prior to award, CAMPO will review to determine whether the proposed supplier demonstrates ownership of the item and assumes all risk for loss or damage during transportation. Determination will be made on responses using the required form.

8.5 For design-build contracts where subcontracts will be solicited throughout the contract period as defined in the DBE Open-Ended Performance Plan in conformance with § 26.53(e), the data must be entered no later than December 1st following the federal fiscal year in which the design-build contractor awards the relevant subcontract(s).

9.0 Payment Tracking

9.1 CAMPO must maintain a running tally of DBE payments on projects. This process shall include the use of forms that document payment to subcontractors and sub consultants to track the current status of DBE commitments and whether a shortfall exists. Attachment 2 includes sample forms used by prime firms to track payments to subcontractors and subconsultants. These are submitted to CAMPO with pay applications and invoices. CAMPO employs a variety of software tools to track the current value of the contract and amounts paid to date.

9.2 Subcontractors and consultants must be paid within 30 days from the receipt of payment from the agency to the prime firm, unless more stringent requirements are established. This includes prompt payment of retainage.

10.0 Compliance

10.1 Firms who do not submit the required forms or who submit incomplete forms may be classified as a non-responsible bidder. Additionally, payment may be withheld from prime firms who do not meet their stated DBE goals or who do not pay subcontractors or subconsultants in a timely manner.

ATTACHMENT 1



ATTACHMENT 2

