

JACKSONVILLE TRANSPORTATION
AUTHORITY
TRIENNIAL OVERALL
DISADVANTAGED BUSINESS
ENTERPRISE GOAL SETTING REPORT



2023 – 2025 DBE Goal Setting Report Period

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SECTION 1 ∞ INTRODUCTION

The Jacksonville Transportation Authority (JTA) respectfully submits this report to the Federal Transit Administration (FTA) for review and approval of the federal fiscal years (FFY) 2023-2025 Triennial Disadvantaged Business Enterprise (DBE) Overall Goal. This report was created based on the DBE goal setting methodology set forth in the United States Department of Transportation (USDOT) DBE regulations, *49 CFR Part 26.45*.

The DBE regulations require JTA, as a recipient of USDOT funding, to set an overall triennial goal for DBE participation on their federally assisted projects. The regulations stipulate that the overall goal should be prepared using a two-step process. According to the USDOT Tips for Goal Setting (USDOT Tips) authored by the General Counsel of the USDOT, the recipient must first determine a base figure for the relative availability of DBEs in the geographic market area. Next, the recipient must examine all relevant evidence to determine what adjustment, if any, is needed to the base figure to arrive at an overall goal. The final adjusted figure is the recipient's overall goal and represents the proportion of federal transportation funding that the recipient is expected to allocate to DBEs during the subsequent three FFY. Once the adjusted overall goal is determined, the process requires the consideration of the portion of the goal that will be met by race and gender-neutral measures. If a recipient purports that it can meet its overall goal with race and gender-neutral measures, those measures must be utilized. In contrast, if the recipient determines that it cannot achieve the entire overall goal using only race and gender-neutral measures, it must establish a race and gender-conscious portion of the overall goal.

SECTION 2 ∞ PROPOSED OVERALL GOAL FOR FFY 2020-2022

Based on the requirements set forth in *49 CFR Part 26* and the USDOT's Guidance Memorandum, Jacksonville Transportation Authority (JTA) is submitting a goal of 23.44% for FFY 2023-2025.

A. Overall Goal Setting Methodology

The two-step goal setting process required by the regulations was used to determine JTA's overall goal. The process requires USDOT recipients to:

- Establish a base figure for the relative availability of DBEs.
- Determine the base figure adjustment, if necessary.

B. Step One Methodology

The base figure is intended to be a measurement of the current ready, willing, and able disadvantaged business enterprises as a percentage of all businesses ready, willing, and able

to perform the recipient’s anticipated FTA-assisted contracts. The regulations present five options for establishing a base figure for the relative availability of DBEs. The five options, as set forth in the regulations, are listed in Table 1.

Table 1: Methods to Determine Baseline Figure

BASELINE FIGURE METHOD
Bidders List
DBE Directories and Census Data
Other Recipient’s Base Figure
Alternative Method
Disparity Study

1. Bidders List Method

This standard requires JTA to have a comprehensive bidders list with DBE prime contractors and subcontractors classified by industry. JTA’s bidders’ records include potential DBEs that have not bid on JTA’s FTA-assisted contracts as either a prime contractor or subcontractor.

The USDOT’s final rule revised standard bidders lists. The lists must: 1) capture data that identify the firms that bid or quote on federally assisted contracts, and 2) identify successful and unsuccessful prime contractors, subcontractors, suppliers, truckers, and other service providers interested in competing for contracts.¹ If the bidders list fails to capture all available firms, it must be used in combination with other data sources to ensure that all available firms are identified to ensure that the overall DBE goal is rationally related to the relative availability of DBEs in the relevant market area.

2. DBE Directories and Census Data Method

DBE directories of Florida USDOT recipients are consolidated into the Florida Unified Certification Program (Florida UCP) database. The database is limited to USDOT-certified businesses. The Census Bureau’s County Business Pattern (CBP) data is a source derived from businesses’ federal income tax filings. The CBP was used as a source to enumerate

¹ USDOT’s Finale, Rule, November 3, 2014.

available businesses in JTA’s market area.² A complete list of the sources used to identify willing and able businesses in JTA’s market area is described in Table 2.

Table 2: DBE Availability Data Sources

DBE Availability Data Sources
Jacksonville Transportation Authority’s Records
Census Bureau’s County Business Pattern
U.S. Small Business Administration Duval County 8(a)
U.S. Small Business Administration Duval County HubZone
U.S. Small Business Administration Duval County SDB
U.S. Small Business Administration Duval County Veteran
U.S. Small Business Administration Duval County Women
Florida Unified Certification Program, Disadvantaged Business Enterprise Directory, Duval County
Florida Office of Supplier Diversity Duval County
Duval County Public Schools Minority Business Affairs Office
Florida Department of Transportation Equal Opportunity Office DBE Vendors, Duval County

3. Other Recipient’s Base Figure Method

This method allows the use of the goal of another USDOT recipient as the base figure for relative availability. JTA can only use another recipient’s goal if the goal is set in accordance with DBE regulations and the contracts of the other agency are similar to the contracting agency and are in a similar market area. This method presumes that there is another USDOT recipient that does the same or similar contracting in the same geographic market area. These conditions cannot be met in JTA’s market area.

4. Alternative Method

Alternative methods may be used to determine a base figure for the overall goal. The alternative methodology used to determine a base figure must be based on demonstrable

² CB1900CBP All Sectors: County Business Patterns, including ZIP Code Business Patterns, by Legal Form of Organization and Employment Size Class for the U.S., States, and Selected Geographies: 2019.

evidence of the local market conditions and designed to ultimately attain a goal that is related to the relative availability of DBEs in JTA's market area. The alternative method provides the most flexibility, but it is also subject to a higher level of scrutiny.

5. Disparity Study Method

The disparity study methodology is the most comprehensive method for identifying ready, willing, and able DBEs that provide goods and services for JTA's anticipated FTA-assisted projects. A disparity study identifies businesses that bid to JTA as either a prime contractor or subcontractor, and those that are interested in bidding. It enumerates DBEs that are bidders, as well as willing and able businesses that have not bid. The availability data sources derived from Jacksonville's Multi-Jurisdictional Disparity Study Report Volume One – Jacksonville Transportation Authority were not utilized to determine availability for the 2023-2025 Overall DBE Goal since the data presented in the Study was from 2011. An updated source list was developed to ensure that the most current version of sources were compiled to enumerate the availability of DBEs and non-DBEs for the October 1, 2019, to September 30, 2021, report period. The list of current sources is described in Table 2.

C. Step Two Methodology

Step Two of the goal setting process requires USDOT recipients to examine relevant and reliable data in its market area to determine if an adjustment to the base figure is warranted. The USDOT modified rule recognizes that there may be circumstances in which a Step Two adjustment is not necessary. The USDOT instructed that "if the base figure and the level of past DBE participation are close or the DBE participation level reflects the effects of past or current noncompliance with DBE program regulations, then the evidence would not support making the adjustment."

D. Goal Setting Methodology

The initial phase of the Step One analysis required the compilation of critical data regarding JTA's procurement. The relevant data included:

- Definition of the market area from an analysis of previous contract awards.
- Identification of the anticipated federally assisted projects and their costs.
- Classification of the anticipated federally assisted projects by North American Industry Classification System (NAICS) code.
- Enumeration of qualified businesses in the market area that are willing and able to provide the goods or services JTA anticipates awarding.

- Analyses of JTA’s expenditures that were funded by federal dollars during the 2019-2021 reporting period.

1. Define JTA’s Market Area

The relevant market area was determined by the location of the prime contractors awarded a JTA contract from October 1, 2019, to September 30, 2021. A cluster analysis was prepared by business location and award amount to define the market area. All procurement with non-profits and other government agencies were excluded from the analysis. The analysis shows 62.86% of prime contract dollars were awarded to 14 businesses located in Duval County. The remaining 10 businesses, which represent 37.14% of contract dollars, were domiciled in areas outside of Duval County. Table 3 presents the location of utilized businesses during the reporting period.

Table 3: Distribution of JTA Contracts Awarded – January 1, 2019, to December 31, 2021

Business Location	Total Businesses	Percent of Businesses	Number of Contracts	Percent of Contracts	Contract Dollars	Percent of Contract Dollars
Duval County	14	58.33%	84	86.60%	\$22,406,695	62.86%
Brevard County	1	4.17%	1	1.03%	\$6,664,830	18.70%
Orange County	2	8.33%	2	2.06%	\$2,174,763	6.10%
Volusia County	1	4.17%	1	1.03%	\$1,904,646	5.34%
Pasco County	1	4.17%	1	1.03%	\$300,000	0.84%
Out Of State	5	20.83%	8	8.25%	\$2,193,962	6.16%
Total	24	100.00%	97	100.00%	\$35,644,895	100.00%

2. NAICS Codes Assigned to Anticipated Projects

A six-digit NAICS code was assigned to each of the anticipated FFY 2023-2025 federally funded projects. The NAICS codes were derived from the project descriptions. Table 4 below defines the relevant NAICS codes by industry.

Table 4: NAICS Codes by Industry

NAICS	Industry	Name
236210	Construction	Industrial Building Construction
236220		Commercial and Institutional Building Construction
237110		Water and Sewer Line and Related Structures Construction
237310		Highway, Street, and Bridge Construction
238110		Poured Concrete Foundation and Structure Contractors
238210		Electrical Contractors and Other Wiring Installation Contractors
238220		Plumbing, Heating, and Air-Conditioning Contractors
238910		Site Preparation Contractors
238990		All Other Specialty Trade Contractors (pt)
541320		Architecture and Engineering
541330	Engineering Services	
541370	Surveying and Mapping (except Geophysical) Services	
325211	Goods and Services	Plastics Material and Resin Manufacturing
325510		Paint and Coating Manufacturing
327320		Ready-Mix Concrete Manufacturing
331210		Iron and Steel Pipe and Tube Manufacturing from Purchased Steel
332323		Ornamental and Architectural Metal Work Manufacturing
332996		Fabricated Pipe and Pipe Fitting Manufacturing
339950		Sign Manufacturing
423110		Automobile and Other Motor Vehicle Merchant Wholesalers
423120		Motor Vehicle Supplies and New Parts Merchant Wholesalers
423320		Brick, Stone, and Related Construction Material Merchant Wholesalers
423390		Other Construction Material Merchant Wholesalers
423420		Office Equipment Merchant Wholesalers
423440		Other Commercial Equipment Merchant Wholesalers
423610		Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers
423850		Service Establishment Equipment and Supplies Merchant Wholesalers
423860		Transportation Equipment and Supplies (except Motor Vehicle) Merchant Wholesalers
424610		Plastics Materials and Basic Forms and Shapes Merchant Wholesalers
424930		Flower, Nursery Stock, and Florists' Supplies Merchant Wholesalers
444220		Nursery, Garden Center, and Farm Supply Stores
484110		General Freight Trucking, Local
485119		Other Urban Transit Systems
485991		Special Needs Transportation
561612		Security Guards and Patrol Services

NAICS	Industry	Name
561730		Landscape Care and Maintenance Services; Tree Trimming Services; Weed Control and Fertilizing Services
561990		All Other Support Services

3. Estimate Anticipated Contract Value by NAICS Code

The federally assisted projects that JTA anticipates awarding over the next three fiscal years were identified with the estimated cost of each project. The projects and their estimated costs for the three-year projections were grouped by NAICS code based on the project descriptions. Table 5 presents the anticipated FFY 2023-2025 projects with the estimated budget.

Table 5: Anticipated Projects Estimated Contract Amount by NAICS Code

NAICS	Industry	Name	Total of Estimated Project Total
236210	Construction	Industrial Building Construction	\$23,593,466
236220		Commercial and Institutional Building Construction	\$4,965,854
237110		Water and Sewer Line and Related Structures Construction	\$1,145,966
237310		Highway, Street, and Bridge Construction	\$1,336,961
238110		Poured Concrete Foundation and Structure Contractors	\$1,018,637
238210		Electrical Contractors and Other Wiring Installation Contractors	\$1,400,625
238220		Plumbing, Heating, and Air-Conditioning Contractors	\$16,492,955
238910		Site Preparation Contractors	\$509,318
238990		All Other Specialty Trade Contractors (pt)	\$509,318
541320		Architecture and Engineering	Landscape Architectural Services
541330	Engineering Services		\$1,018,637
541370	Surveying and Mapping (except Geophysical) Services		\$763,977
325211	Goods and Services	Plastics Material and Resin Manufacturing	\$763,977
325510		Paint and Coating Manufacturing	\$763,977
327320		Ready-Mix Concrete Manufacturing	\$254,659
331210		Iron and Steel Pipe and Tube Manufacturing from Purchased Steel	\$1,782,614
332323		Ornamental and Architectural Metal Work Manufacturing	\$1,018,637
332996		Fabricated Pipe and Pipe Fitting Manufacturing	\$763,977
339950		Sign Manufacturing	\$127,330
423110		Automobile and Other Motor Vehicle Merchant	\$897,604

NAICS	Industry	Name	Total of Estimated Project Total
		Wholesalers	
423120		Motor Vehicle Supplies and New Parts Merchant Wholesalers	\$4,655,923
423320		Brick, Stone, and Related Construction Material Merchant Wholesalers	\$891,307
423390		Other Construction Material Merchant Wholesalers	\$1,782,614
423420		Office Equipment Merchant Wholesalers	\$140,000
423440		Other Commercial Equipment Merchant Wholesalers	\$4,371,818
423610		Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers	\$1,757,705
423850		Service Establishment Equipment and Supplies Merchant Wholesalers	\$254,659
423860		Transportation Equipment and Supplies (except Motor Vehicle) Merchant Wholesalers	\$41,143,062
424610		Plastics Materials and Basic Forms and Shapes Merchant Wholesalers	\$763,977
424930		Flower, Nursery Stock, and Florists' Supplies Merchant Wholesalers	\$127,330
444220		Nursery, Garden Center, and Farm Supply Stores	\$127,330
484110		General Freight Trucking, Local	\$190,994
485119		Other Urban Transit Systems	\$0
485991		Special Needs Transportation	\$102,833
561612		Security Guards and Patrol Services	\$509,318
561730		Landscape Care and Maintenance Services; Tree Trimming Services; Weed Control and Fertilizing Services	\$381,989
561990		All Other Support Services	\$763,977
		TOTAL	\$117,393,327

SECTION 3 ∞ STEP ONE – BASE FIGURE DETERMINATION

The base figure is intended to be a measurement of the relative percentage of ready, willing, and able DBEs. JTA is required to measure willing and able businesses in its market area using the best available evidence to derive a fair and accurate base figure that represents the percentage of available DBEs.

The USDOT rules require the calculation of the base figure using the following formula:

$$\text{Step One Base Figure} = \frac{\text{Ready, willing, and able DBEs}}{\text{All ready, willing, and able businesses (Including DBEs and Non - DBEs)}}$$

The availability database was populated with businesses in the market area that provide the goods and services JTA procures derived from the sources presented in Table 2. To enumerate a more refined accounting of availability, the database was then queried to include only businesses with the NAICS codes of the anticipated contracts. Businesses that do not perform the types of work related to the anticipated contracts were excluded to ensure that the base figure did not overstate the number of available businesses. Table 7 below presents the relative availability by relevant NAICS code. The percentage of available businesses in each NAICS code reflects the portion of the total available businesses in the market area. The relative availability of DBEs within the market area is 23.79%.

Table 6: Relative Availability by NAICS Code for FFY 2020-2022

NAICS	Number of Available Firms		Percent of Total Available Businesses	
	DBE	All	DBE	All
236210	6	10	0.25%	0.42%
236220	81	123	3.38%	5.13%
237110	15	39	0.63%	1.63%
237310	20	33	0.83%	1.38%
238110	16	59	0.67%	2.46%
238210	15	229	0.63%	9.56%
238220	28	358	1.17%	14.94%
238910	50	51	2.09%	2.13%
238990	126	162	5.26%	6.76%
541320	13	22	0.54%	0.92%
541330	66	256	2.75%	10.68%
541370	8	30	0.33%	1.25%
327320	0	14	0.00%	0.58%
424610	0	9	0.00%	0.38%
485119	0	0	0.00%	0.00%
325211	1	1	0.04%	0.04%
325510	1	4	0.04%	0.17%
331210	1	1	0.04%	0.04%
332323	3	10	0.13%	0.42%
332996	1	1	0.04%	0.04%
339950	4	15	0.17%	0.63%
423110	1	32	0.04%	1.34%
423120	0	61	0.00%	2.55%
423320	7	12	0.29%	0.50%

NAICS	Number of Available Firms		Percent of Total Available Businesses	
	DBE	All	DBE	All
423390	1	20	0.04%	0.83%
423420	4	34	0.17%	1.42%
423440	2	8	0.08%	0.33%
423610	10	48	0.42%	2.00%
423850	5	18	0.21%	0.75%
423860	1	17	0.04%	0.71%
424930	1	8	0.04%	0.33%
444220	0	16	0.00%	0.67%
484110	9	172	0.38%	7.18%
485991	5	11	0.21%	0.46%
561612	5	43	0.21%	1.79%
561730	55	431	2.30%	17.99%
561990	9	38	0.38%	1.59%
Total	570	2396	23.79%	100.00%

Weighting is recommended in USDOT Tips to determine the overall goal. The first step is to calculate a weight for each NAICS code, which is the percentage of the estimated dollar amount for FFY 2023-2025 anticipated contracts. The second step is to divide the number of DBEs by the total number of businesses in each NAICS code and multiply the result by the corresponding weight to calculate the weighted percentage of DBE availability. Thereafter, the weighted percentages in each NAICS code are combined to determine the weighted base figure. Table 8 presents the calculation of weighted availability. The weighted DBE availability is 23.44%.

Table 7: Weighted Base Figure

NAICS Code	Percent of Available Firms			Total of Estimated Project Total	Industry Weight	Percent of Weighted Firms		
	DBE	Non-DBE	All			DBE	Non-DBE	All
236210	60.00%	40.00%	100%	\$11,500,000	11.83%	7.10%	4.73%	11.83%
236220	65.85%	34.15%	100%	\$4,965,854	5.11%	3.36%	1.74%	5.11%
237110	38.46%	61.54%	100%	\$1,145,966	1.18%	0.45%	0.73%	1.18%
237310	60.61%	39.39%	100%	\$1,336,961	1.37%	0.83%	0.54%	1.37%
238110	27.12%	72.88%	100%	\$1,018,637	1.05%	0.28%	0.76%	1.05%
238210	6.55%	93.45%	100%	\$1,400,625	1.44%	0.09%	1.35%	1.44%
238220	7.82%	92.18%	100%	\$8,430,644	8.67%	0.68%	7.99%	8.67%
238910	98.04%	1.96%	100%	\$509,318	0.52%	0.51%	0.01%	0.52%
238990	77.78%	22.22%	100%	\$509,318	0.52%	0.41%	0.12%	0.52%

NAICS Code	Percent of Available Firms			Total of Estimated Project Total	Industry Weight	Percent of Weighted Firms		
	DBE	Non-DBE	All			DBE	Non-DBE	All
541320	59.09%	40.91%	100%	\$300,000	0.31%	0.18%	0.13%	0.31%
541330	25.78%	74.22%	100%	\$1,018,637	1.05%	0.27%	0.78%	1.05%
541370	26.67%	73.33%	100%	\$763,977	0.79%	0.21%	0.58%	0.79%
327320	0.00%	100.00%	100%	\$254,659	0.26%	0.00%	0.26%	0.26%
424610	0.00%	100.00%	100%	\$763,977	0.79%	0.00%	0.79%	0.79%
485119	0.00%	0.00%	100%	\$0	0.00%	0.00%	0.00%	0.00%
325211	100.00%	0.00%	100%	\$763,977	0.79%	0.79%	0.00%	0.79%
325510	25.00%	75.00%	100%	\$763,977	0.79%	0.20%	0.59%	0.79%
331210	100.00%	0.00%	100%	\$1,782,614	1.83%	1.83%	0.00%	1.83%
332323	30.00%	70.00%	100%	\$1,018,637	1.05%	0.31%	0.73%	1.05%
332996	100.00%	0.00%	100%	\$763,977	0.79%	0.79%	0.00%	0.79%
339950	26.67%	73.33%	100%	\$127,330	0.13%	0.03%	0.10%	0.13%
423110	3.13%	96.88%	100%	\$897,604	0.92%	0.03%	0.89%	0.92%
423120	0.00%	100.00%	100%	\$4,655,923	4.79%	0.00%	4.79%	4.79%
423320	58.33%	41.67%	100%	\$891,307	0.92%	0.53%	0.38%	0.92%
423390	5.00%	95.00%	100%	\$1,782,614	1.83%	0.09%	1.74%	1.83%
423420	11.76%	88.24%	100%	\$140,000	0.14%	0.02%	0.13%	0.14%
423440	25.00%	75.00%	100%	\$4,371,818	4.50%	1.12%	3.37%	4.50%
423610	20.83%	79.17%	100%	\$1,757,705	1.81%	0.38%	1.43%	1.81%
423850	27.78%	72.22%	100%	\$254,659	0.26%	0.07%	0.19%	0.26%
423860	5.88%	94.12%	100%	\$41,143,062	42.31%	2.49%	39.82%	42.31%
424930	12.50%	87.50%	100%	\$127,330	0.13%	0.02%	0.11%	0.13%
444220	0.00%	100.00%	100%	\$127,330	0.13%	0.00%	0.13%	0.13%
484110	5.23%	94.77%	100%	\$190,994	0.20%	0.01%	0.19%	0.20%
485991	45.45%	54.55%	100%	\$102,833	0.11%	0.05%	0.06%	0.11%
561612	11.63%	88.37%	100%	\$509,318	0.52%	0.06%	0.46%	0.52%
561730	12.76%	87.24%	100%	\$381,989	0.39%	0.05%	0.34%	0.39%
561990	23.68%	76.32%	100%	\$763,977	0.79%	0.19%	0.60%	0.79%
TOTAL				\$97,237,551	100%	23.44%	76.56%	100.00%

A. Considerations for Adjustments to the Base Figure

The Step Two base figure adjustment, as recommended in USDOT Tips, requires examining relevant and reliable data in JTA’s market area to determine if an adjustment to the base figure is warranted. The consideration of an adjustment is intended to account for any impact the relevant factors may have on DBEs’ contracting opportunities with JTA. The following factors were considered for the Step Two adjustment:

1. Past DBE Participation

DBE participation during the FFY 2019-2022 reporting period was documented in B2GNow. Table 9 details the median overall DBE participation during FFY 2019-2022. The median figure is the center point among an ordered list of numbers. JTA achieved 44.96% median prime contractor and subcontractor race and gender-neutral and race and gender-conscious DBE utilization; the highest overall DBE utilization of 71.48% was achieved in FFY 2021. The DBE participation by percent of all dollars awarded by JTA during FFY 2019-2022 is presented in Table 10.

Table 8: FFY 2019-2022 Median Past DBE Participation

2019	2020	2021	2022
41.77%	23.04%	71.48%	48.14%
Median DBE Utilization:	44.96%		

Table 9: DBE participation as a percent of all dollars awarded during FFY 2019-2022.

FY	Total Dollars	Total Race-Conscious Dollars	Total Race-Neutral Dollars	DBE Participants
2019	\$6,710,433	\$771,701	\$2,031,419	41.77%
2020	\$7,752,445	\$684,083	\$1,102,156	23.04%
2021	\$18,729,644	\$4,580,522	\$8,808,254	71.48%
2022	\$2,452,373	\$398,917	\$781,704	48.14%
Total	\$35,644,895	\$6,435,223	\$12,723,532	

B. Adjustments to the Base Figure

As required by the USDOT Tips, the factors noted above were considered and no adjustments were made for the Step Two analysis.

FINAL OVERALL DBE GOAL
23.44%

SECTION 5 ∞ RACE-CONSCIOUS AND RACE-NEUTRAL GOAL

The final requirement of the goal setting process, as noted in *49 CFR 26.51*, is to determine the projected portion of the overall goal that will be achieved by race-and gender-neutral measures. The DBE regulations in *49 CFR 26.51* require that a recipient meet the maximum feasible portion of its overall goal by using race-and gender-neutral measures. The USDOT Tips provides that recipients that have instituted new and comprehensive mechanisms aimed at obtaining additional DBE participation through race-and gender-neutral means, may provide a basis for estimating a greater level of race-and gender-neutral participation. JTA has not implemented any substantial mechanisms aimed to achieve additional DBE participation through race-and gender-neutral means since the implementation of its 2020 – 2022 DBE Overall Goal. Thus, there is no justification to assign a significantly higher race-and gender-neutral portion to the overall DBE 2023-2025 goal. Therefore, the race-and gender-conscious and race and gender-neutral portion of the 2023-2025 goal is specified below.

12.44% Race-Neutral + 11.00% Race-Conscious =

23.44% Overall DBE Goal