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# Atlanta Regional Commission

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FTA DBE Goal Methodology

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October 2025

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## FFY 2026-2028 Overall Disadvantaged Business Enterprise (DBE) Goal Methodology

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### I. Detailed Methodology: Specific Steps

#### A. Amount of Goal

The Atlanta Regional Commission (“ARC”)’s overall goal for federal fiscal years (FFY) 2026-2028 is **28.72%** of the federal financial assistance it will expend in FTA-assisted contracts.

ARC expects to let FTA-assisted contracts in the amount of **\$1,875,000** for FFY 2026- 2028. ARC has set a goal of expending approximately **\$538,500** with DBEs during this three-year period.

#### B. Determination of the Market Area

The market area is determined through an assessment of the area from where the substantial majority (at least 70%-75%) of previous bidders came, and the area where the substantial majority of dollars were spent. In analyzing the area from where the substantial bidders came, the market area is as shown below in Table 1.

**Table 1: Market Area – Atlanta Regional Commission projects**

COUNTY	# of bidders	% of bidders
Cobb County		
DeKalb County		
Fulton County		
Gwinnett County		
SUBTOTAL		
Others		
TOTAL		

Source: Atlanta Regional Commission

#### C. Determination of relevant NAICS codes

Below is a list of activities and NAICS codes that correspond to ARC’s FFY 2026-2028 projects:

**Table 2: FFY 2026-2028 Projects & Activities**

PROJECT	ACTIVITY	NAICS
Regional Household Travel Study	Public opinion polling services	541910

Source: Atlanta Regional Commission

**D. Determination of Relative Availability of DBEs in Market Area, Compared to All Firms**

**Table 3a: Determination of Weight by NAICS code— FFY 2026 – 2028**

NAICS Code	Project Activity	Amount of USDOT Funds on project	% of total USDOT funds (weight)
541910	Public opinion polling services	\$1,875,000	100.00%

**Table 3b: Determination of DBE availability by NAICS code— FFY 2026 – 2028**

NAICS Code	Project Activity	Number of DBEs available to perform this work	Number of all firms available (including DBEs)	Relative Availability
541910	Public opinion polling services	27	94	28.72%
<b>Overall DBE Availability →</b>			<b>28.72%</b>	

**Table 3c: (Availability) x (Weight) = Weighted Base Figure**

NAICS Code	Project Activity	Availability	x	Weight	=	Weighted Base Figure
541910	Public opinion polling services	28.72%	x	1.00	=	<b>28.72%</b>

**SOURCES:**

- 2023 County Business Patterns, U.S. Census Bureau, June 27, 2025.
- Georgia Department of Transportation UCP Directory, September 2025.

**NOTE:** The County Business Patterns data were used as the source to determine the denominator, or the number of all firms in the market area. The DBE directories listed above were used to determine the numerator, or the number of DBE firms in the market area.

**E. Determination of the “Weighted” DBE Base Figure**

The Step 1 DBE Base Figure was derived by using a weighting process by which the percentage of dollars spent on various activities represented by NAICS codes (weight) were multiplied by the percentage of relevant DBE firms to all relevant firms (availability) as indicated in Table 3c above.

The Step 1 DBE base figure for ARC for FFY 2026–2028 is **28.72%**.

## II. Adjustments to the DBE Base Figure

After the DBE base figure has been calculated, the regulations (49 CFR Part 26) require that:

“...additional evidence in the sponsor’s jurisdiction be considered to determine what adjustment, if any, is needed to the base figure in order to arrive at your overall goal” (26:45(d)).

### A. Adjustment Factors to Consider

The regulations further state that there are several types of evidence that must be considered when adjusting the base figure. These include:

*“(i) The current capacity of DBEs to perform work in your USDOT-assisted contracting program, as measured by the volume of work DBEs have performed in recent years” (49 CFR Part 26.45(d)(1)(i))*

ARC showed the following DBE participation from its semiannual DBE accomplishment reports:

**Table 4: DBE Past Participation – FFY 2022-2024**

REPORT PERIOD	APPROVED GOAL	TOTAL DBE PERCENT ACHIEVED	ACHIEVED OVER/UNDER
FFY 2022 - 1	17.61%	0.00%	-17.61%
FFY 2022 - 2	17.61%	0.00%	-17.61%
FFY 2023 - 1	17.61%	0.00%	-17.61%
FFY 2023 - 2	17.61%	0.00%	-17.61%
FFY 2024 - 1	17.61%	33.93%	16.32%
FFY 2024 - 2	17.61%	0.00%	-17.61%
MEDIAN =		0.00%	-17.61%

49 CFR Part 26.45(d)(2) also states that the following must be considered for the purposes of considering an adjustment to the base figure:

*“(i) Statistical disparities in the ability of DBEs to get the financing, bonding and insurance required to participate in your program;*

*(ii) Data on employment, self-employment, education, training and union apprenticeship programs, to the extent you can relate it to the opportunities for DBEs to perform in your program.”*

Several agencies were contacted, including the Governor’s Entrepreneur and Small Business Office (ESBO), the Georgia DOT Equal Opportunity Division, and the Small Business Development Center office at Georgia State University in Atlanta GA, to inquire about disparity studies. None of the entities had any disparity studies or data available for the

Atlanta area, and none had any data available noting disparities regarding DBEs' access to bonding, capital, insurance, etc.

A disparity study was conducted for the City of Atlanta in 2015. The study focused on City-funded projects, and the study showed that there was no disparity in utilization of MBE and WBE firms on City-funded projects due to the application of the Equal Business Opportunity (EBO) program. The study made a recommendation for what participation rates by MBE and WBE firms could be for City-funded projects. Because the study focused only on City-funded projects, and not federally-funded projects, and because of the age of the study, the disparity data will not be utilized to make an adjustment to the DBE goal.

A disparity study was conducted for the Georgia Department of Transportation (GDOT) and the findings were released in July 2016. The study demonstrated that there exists disparity between the availability of minority- and women-owned firms and DBEs to perform GDOT-funded work, and the utilization of said firms. Because the study does not focus on FTA contracts, and because of the age of the study, the disparity study data will not be used to make an adjustment to the base figure.

Fulton County's Department of Purchasing and Contract Compliance offers free assistance to contractors and subcontractors with insurance and bonding.

The Georgia State University's Small Business Development Center office in Atlanta GA has consultants available to assist DBE firms in writing business plans; conforming to federal government regulations; bidding on federal, state, and local contracts; finding capital, etc. The agency does not conduct disparity studies, but it does provide resources to assist DBEs in obtaining a greater opportunity to participate in federal contracts.

## **B. Consultations and Public Participation Requirements**

### **1. Consultation**

Before establishing the overall updated triennial goal, ARC posted a notice announcing a public consultation meeting, which was conducted by ARC on October 30, 2025, in order to give opportunity for public input on the goal methodology. ARC also sent the notice to minority, women's and general contractor groups, and community organizations, seeking to obtain information concerning the availability of disadvantaged and non-disadvantaged businesses, and the effects of discrimination on opportunities for DBEs. The meeting was held via GoToWebinar. The discussion from the meeting is in Appendix B.

### **2. Publication**

ARC posted the proposed FFY 2026-2028 goal on its website, announcing the 30-day review and comment period.

## **C. Adjustment to Step 1 DBE Base Figure: FFY 2026-2028**

Having considered the above-mentioned adjustment factors, ARC will not adjust the Step 1 DBE base figure. The calculation for the overall DBE goal is shown below in Table 5:

**Table 5: Calculation of overall DBE goal**

Federal Fiscal Years	Step 1 Base figure	Step 2 Adjustment	Overall DBE Goal	Federal grants	DBE Goal in Dollars
FFY 2026-2028	28.72%	n/a	28.72%	\$1,875,000	\$538,500

### III. Process

ARC will normally submit its overall goal to the FTA on August 1 of the required year of submission.

In establishing the overall goal, ARC provided for consultation and publication. The consultation included minority-, women's and general contractor groups, and small business organizations that could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and ARC's efforts to establish a level playing field for the participation of DBEs. The consultation included a scheduled, direct, interactive exchange via a web conference with as many interested stakeholders as possible focused on obtaining information relevant to ARC's goal setting process. The consultation meeting was held on October 30, 2025, prior to the submission of the DBE goal methodology to FTA for review pursuant to paragraph (f) of this section. ARC documented in the goal submission the consultation process that was utilized (see [Appendix B of Attachment 5](#)).

Following this consultation, ARC published a notice of the proposed overall goal, informing the public that the proposed goal and its rationale were available for inspection for 30 days from the date of the notice. The notice was posted on ARC's website (**INSERT URL HERE**).

ARC will begin using the overall goal on October 1 in accordance with FTA's schedule, unless ARC has received other instructions from USDOT/FTA (or, if the goal is established on a project basis) by the time of the first solicitation for a USDOT/FTA-assisted contract for the projects.

### IV. Breakout of Estimated Race-Conscious/Race-Neutral Participation

ARC will meet its goal using race-neutral means.

## Appendix A: Resource Listing

### A. Resource Documents

1. 2023 County Business Patterns, U.S. Census Bureau, June 27, 2025.
2. Georgia Department of Transportation UCP DBE Directory, September 2025.

## Appendix B: Notice to the Public

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# **Disadvantaged Business Enterprise (DBE) Consultation Town Hall Meeting**

**Wednesday, October 22, 2025  
11:30 AM - 12:30 PM**

Please join us for an online town hall meeting to discuss a proposed Disadvantaged Business Enterprise plan, which includes an overall goal of 21.51% for DBE participation on all Federal Highway Administration assisted contracts during federal fiscal years 2026-2028.

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For more information, including meeting login details, visit:  
<https://atlantaregional.org/about-arc/arc-business-opportunities/>





## Appendix C: Summary of Public Consultation Activities

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**Disadvantaged Business Enterprise (DBE) Plan 2025 Update  
Consultation Event  
Summary Report**

DBE Consultation Event  
Piedmont Conference Room (virtual meeting)  
October 22, 2025 (11:30 am to 12:30 pm)

**Overview of DBE Consultation Event**

The objective, or regulatory goal, of holding a DBE consultation event is to obtain information relevant to the goal-setting process.

Three specific areas of the goal-setting process are the focus:

1. The availability of disadvantaged and non-disadvantaged businesses;
2. The effects of discrimination on opportunities for DBEs; and
3. Establishment of level playing field for the participation of DBEs

**Invitation and Outreach Approach**

The outreach approach was designed to reach the consulting community, with a specific focus on DBEs and those who have historically been underrepresented in transportation business opportunities.

The list of partner organizations was compiled with that objective in mind. Organizations contacted included:

- **Women's Transportation Seminar (WTS)**– social media announcement posted on their linked in page, courtesy of WTS President, Iris Ortiz.
- **COMTO** – social media announcement shared with board member, Kenyata Smiley.
- **Georgia Planning Association** – Invitation and announcement shared with GPA President, Kristen Wescott.

Additional outreach methods included:

- Invitation posted on **ARC website** and social media channel, 10/16.
- **Email invitation** sent to Transportation Planning Department Consultant List, including DBEs, (200 recipients)
  - Reviewed the GDOT DBE List, cross checked with ARC Consultant List, and ensured our DBE outreach was sent to the firms most likely to apply for ARC opportunities (additional 150 recipients).

### **ARC Staffing and Event Logistics**

This meeting was held virtually, with ARC staff presenting and facilitating from the Piedmont Conference Room. The meeting was recorded and transcribed.

- Haley Berry, Deputy Chief Operating Officer
- John Orr, Managing Director, Transportation Planning Department
- Liz Sanford, Manager, Transportation Planning Department
- Eleanor Swensson, Senior Planner, Transportation Planning Department
- Reginald Bryant, Program/Project Administrator, Procurement Department
- John Bayalis, Chief External Affairs Officer

Additional ARC staff and DBE Program Plan Draft presenters participating on-line included:

- Kimberly King, Equal Opportunity Officer, GDOT, on-line
- Kevin Weeden, KWA Planning, on-line
- Rhea Thomas, ARC DBE Compliance Officer, on-line
- Mike Alexander, ARC Chief Operating Officer, on-line
- David Haynes, ARC, on-line

### **Meeting Agenda and Format**

11:30 AM	Welcome and Introduction of ARC Staff (Haley Berry)
11:35 AM	Objectives of DBE Consultation Event (Haley Berry)
11:40 AM	Presentation – Overview of DBE Goal, Goal Setting, and Plan (John Orr)
11:45 AM	Introduce the format and discussion questions (Liz Sanford)
12:25 PM	Closing Comments (Haley Berry)
12:30 PM	Adjourn

### **Four Questions for the Public Comment**

1. Is our goal realistic? How would you describe the availability of ready, willing and able DBEs to assist ARC with projected contract work? Are there challenges to teaming up with other firms?
2. In your experience as a DBE, what are the opportunities for business growth in transportation? Are they constricted in any way that you experienced as discrimination? What challenges do you face as you grow? What would you need to remain an owner of your firm as it grew?
3. Are you aware of ARC opportunities? In your opinion, is there a level playing field for DBEs that offer consulting services in transportation?
4. General questions?

Participants could sign up for a speaking time using a Microsoft Form or the “Raise Hand” function in Teams. ARC staff also provided a Public Input link where participants could submit written comments. These links were shared multiple times throughout the meeting to increase participants’ ease of access.

### **Summary of Presentation**

#### **1. Opening Remarks and Purpose of Consultation**

- *Haley Berry* opened the meeting and explained that the goal is to collect stakeholder input to inform the current update of ARC’s DBE Program Plan Draft.
- Haley explained that the discussion was focused on three areas:
  - Availability of DBE and non-DBE firms for ARC’s contracts.
  - Effects of discrimination on DBE business opportunities.
  - Ensuring a level playing field for DBEs competing for ARC contracts.
- It was clarified that the DBE Consultation meeting is non-binding but will guide ARC’s future policy and goal revisions aligned with FTA, FHWA, and GDOT guidance.

#### **2. Overview of DBE Program and New Federal Requirements**

- *John Orr* presented an overview of the DBE program’s purpose, emphasizing remedying the effects of discrimination and promoting fair competition.
- Recent federal updates (Interim Final Rule, Oct 3, 2025) remove race and gender presumptions of disadvantage.
  - All applicants must now prove individual social and economic disadvantage through a personal narrative.
  - All existing DBEs must be recertified under this standard.
- ARC must resubmit its DBE Plan to the FTA by November 1, 2025, covering goals for 2026–2028.
- Proposed DBE Goals:
  - FTA Projects: 28.72%
  - FHWA Projects: 22.23%
- These figures will be subject to revision following further federal guidance and GDOT recertification updates.

### **Summary of Comments**

#### **3. Public Comment and Input Procedure**

- *Elizabeth Sanford* explained the public comment process via a Microsoft Forms link in the meeting chat.
- Participants could speak for two minutes or submit written comments through a Public Input Form or via email to the interim DBE Director. Written comments must be received by October 27, 2025.
- Four discussion questions were presented covering:
  1. Realism and feasibility of ARC’s proposed DBE goals.
  2. Opportunities and challenges for DBEs in transportation planning.
  3. Accessibility and fairness of ARC contracting opportunities.
  4. Open/general questions or technical inquiries about DBE methodology.

#### **5. Stakeholder Question and Answer Highlights**

#### a. Project Types

- *Kimberly King (GDOT)* inquired about the types of projects ARC contracts that could involve DBEs.
- *John Orr* clarified ARC contracts are mainly for transportation planning and surveys, including:
  - County transportation plans
  - Transit and Livable Centers Initiative (LCI) studies
  - Travel pattern and household surveys
- *Haley Berry* added that consultant contracts often include public engagement, modeling, and data analysis components.

#### b. Comparison of Past and Current DBE Goals

- *MaKara Rumley (Hummingbird)* asked to hear more about ARC's previous DBE goal percentages.
- *Haley Berry* confirmed the previous DBE goal was 16.7% (combined for FTA and FHWA).
- *Kevin Weeton (Consultant)* explained the new higher goals reflect:
  - Updated availability data of DBE firms.
  - Narrowed market area analysis based on bidder history.

#### c. GDOT's Implementation of the Interim Final Rule

- *Kimberly King (GDOT)* outlined GDOT's extensive effort to re-evaluate all ~4,000 certified firms:
  - Each firm must submit a personal narrative detailing individual disadvantage.
  - GDOT is developing a standardized form and instructions for submission and review.
  - Training will be provided for GDOT, MARTA, and partner agencies to ensure consistent evaluations.
  - GDOT plans to host a public informational session at their headquarters to explain the process.
  - No specific timeline yet, but reevaluation will begin "as soon as practicable."

#### d. Concerns from DBE Representatives

- *MaKara Rumley (Hummingbird)* expressed concern about the burden and emotional toll of the personal narrative requirement, describing it as "extractive" and "trauma-inducing."
- She questioned who would judge the narratives and what criteria would define sufficient disadvantage.
- *Kimberly King* acknowledged the concern and emphasized GDOT's intent to:
  - Base assessments on SBA 8(a) program standards.
  - Ensure consistency, fairness, and staff training.
  - Work collaboratively with other state DOTs to align best practices.

#### 5. Closing Remarks

- *Haley Berry* thanked all participants for their contributions and reiterated:
  - Comments and discussion will be incorporated into the DBE Plan development.
  - ARC is committed to maintaining open dialogue and transparency with the DBE community.
- The public input window remains open until October 27, 2025 for additional written comments.

### List of Attendees

This list includes all external participants what logged onto the Teams meeting while it was in session. Two participants only provided a first name, so ARC does not

Name	Company or Agency	Notes
Belinda Morrow	2M Design Consultants	Registered with phone number 404-931-3888
<i>Not provided</i>	IPCOMM	Registered with phone number 770-987-7400
<i>Not provided</i>	IPLACEMENT, INC	Registered with phone number 786-306-7361
Akyiaa Morrison	SMNEXT	
Brian Hightower	Hightower Media	
Brittany Israel	Lumenor Consulting Group	
Byron Rushing	Toole Design Group	
Caroline Evans	Barrow County	
Chandler Fincher	Southeastern Engineering, Inc	
Dawn Johnson	Dawson County	
Donett Yahzid	Corporate Environmental Risk Management	
Gavin Ireland	Georgia Green Energy Services LLC	
Genine Bryant	Corporate Environmental Risk Management	
Haley Carmack	2MNEXT	
Brittany Helliard	Kimley-Horn	
Jackie Tyson	New South Associates	
Jason Dickerson	VHB	
JENNIFER		Provided first name only, unable to identify firm or agency.
Jewana Helmstetter	USDOT Mid South Atlantic SBTRC	



Lauren Leary	Spatial Plans	
Lee		Provided first name only, unable to identify firm or agency.
MaKara Rumley	Hummingbird	Spoke during the public comment period.
Matt Tester	BJH Advisors	
Gina Putthoff	Pond & Co	
Scott Jordan	Southeastern Engineering	
Sulla Hamer		Unable to find association.
Vanessa Lira	Toole Design	
Vida Mannings	The Collaborative Firm	
Alex Williams	McMillan Pazdan Smith	