



2024 -2026 FTA DBE Triennial Goal FAQs

Q: Did Metropolitan Council create the methodology?

A: No, the methodology of the FTA Triennial goal setting found in CFR 49 Part 26.45 and that of Dr. Myers and the U of M was used to establish the FTA DBE triennial goal.

Q: What was the last Triennial goal?

A: The 2021 – 2023 goal was 14%

Q: What was the achievement?

A: 2017 - 14% 2018 -15% 2019 - 16% 2020 – 13% 2021 – 14.02% 2022 – 18.22%

Q: What is a primary factor for past achievement?

A: A number of large federally assisted contracts, including D Line Construction, B Line Evaluation, Blue Line Enhancements, Purple Line Engineering, Gold Line Construction and Civil Construction have been awarded in 2021 and 2022.

Q: How is this triennial goal different than the last?

A: The 2021 – 2023 triennial goal is consistent with FTA goal setting methodology in using DBE directory and Census Bureau data along with 3-year project forecast. This method best reflects the anticipated DBE utilization. For the current Triennial, OEEO worked with Dr. Myers and the U of M to establish the triennial goal. They utilize a combination of several methodologies to produce the goal.

Q: How does this goal compare to MnDOT & MAC?

A: MnDOT FTA	2022 - 2024 goal is 6.8%	Achievement in 2022 = 0%
MnDOT FHWA	2022 - 2024 goal is 12.6%	Achievement in 2022 = 11.9%
Metropolitan Airport Commission	2019 - 2022 goal is 12%	Achievement in 2022 = 16.8%

Q: How did the Council determine our Market Area?

A: Local market area is the area in which the substantial majority of the contractors and subcontractors with which the Council does business are located and the area in which the Council spends the substantial majority of our contracting dollars.

Q: Why is the goal not higher than 13.4% if the last triennial was 14%?

A: Goal methodology is prescribed in federal regulation. The total base goal and median are averaged to get an adjusted goal. This goal can be further adjusted to reflect current market and current DBE availability in the market region. Due to current conditions, Metropolitan Council believes that 13.4% is most reflective of DBE participation on future projects.

Q: What monitoring mechanisms do you have in place to ensure you are on track to meet or exceed the goal?

A: The Council submits semi-annual achievement reports to FTA that includes an analysis if the Council is under or over the 3-year goal. Furthermore, in setting contract specific goals the triennial goal is always used as an adjustment tool to achieve the Triennial goal of 13.4%.

Q: What if you do not meet the 13.4% program goal at the end of the triennial?

A: OEEO provides the FTA a shortfall analysis detailing the achievement and why the 13.4% program goal was not met.

Q: Can you be penalized if you do not meet the goal?

A: No, recipients cannot be penalized for not meeting their goal if they administer their DBE program in good faith.

Q: Will you increase the goal for the next triennial if you exceed the 13.4% program goal?

A: Possibly. Triennial goals are calculated using the relative availability of DBE firms in the marketplace and the forecasted makeup of capital projects, both of which vary from year to year.

Q: Are any efforts being taken to increase the DBE pool?

A: Yes, Metropolitan Council Office of Equity & Equal Opportunity is taking steps to identify industry gaps for which there are limited firms to perform the work and utilizing industry resources to proactively seek firms that may fill this need.

Q: Why is the Council taking this action?

A: All recipients of FTA funding over \$250,000 are required to have a DBE program and create a DBE triennial goal.

Q: To what activities does this goal apply?

A: All contracts for construction, design, professional services, and goods that anticipate using FTA dollars within the next three years and offer contracting/subcontracting opportunities.

Q: What is race neutral and race conscious measures?

A: Race neutral measures are ones that can be used to assist all small businesses (providing financial and technical assistance). / Race conscious measures are those focused specifically on DBEs (contract goal setting).

Q: What is the DBE program? / What is the purpose of the DBE program?

A: The DBE FTA program is a subcontracting program that exists to mitigate the effects of past discrimination, provide access and is designed to level the playing field for businesses owned by women, people of color and indigenous persons (DBEs).

Q: Where can I go to learn more about the DBE program generally?

A: <https://metro council.org/About-Us/Organization/Office-of-Equal-Opportunity/Small-Business-Programs/Disadvantaged-Business-Program.aspx>, or email dbe@metc.state.mn.us

Q: How can I get more involved with the DBE program at the Met Council?

A: email dbe@metc.state.mn.us



2024 -2026 EPA DBE Triennial Goal FAQs

Q: Did Metropolitan Council create the methodology?

A: No, the methodology of the FTA Triennial goal setting found in CFR 49 Part 26.45 and that of Dr. Myers and the U of M was used to establish the EPA DBE triennial goal for consistency. EPA does not require goal setting

Q: What was the last Triennial goal?

A: The 2021 – 2023 goal was 11%

Q: What was the achievement?

A: 2019 – 10.60% 2020 – 29.28% 2021 – 10.58% 2022 –16.70% 2023 – TBD

Q: How is this triennial goal different than the last?

A: The 2021 – 2023 triennial goal is consistent with FTA goal setting methodology in using DBE directory and Census Bureau data along with 3-year project forecast. This method best reflects the anticipated DBE utilization. For the current Triennial, OEEO worked with Dr. Myers and the U of M to establish the triennial goal. They utilize a combination of several methodologies to produce the goal.

Q: How does this goal compare to MnDOT & MAC?

A: MnDOT FHWA	2022 - 2024 goal is 12.60%	Achievement in 2022 = 11.9%
MnDOT FTA	2022 - 2024 goal is 6.80%	Achievement in 2022 = 0%
Metropolitan Airport Commission	2019 - 2012 goal is 12.0%	Achievement in 2022 = 16.8%

Q: How did the Council determine our Market Area?

A: Local market area is the area in which the substantial majority of the contractors and subcontractors with which the Council does business are located and the area in which the Council spends the substantial majority of our contracting dollars

Q: What monitoring mechanisms do you have in place to ensure you are on track to meet or exceed the goal?

A: The Council submits annual achievement reports to EPA that includes an analysis if the Council is under or over the 3-year goal. Furthermore, in setting contract specific goals the triennial goal is always used as an adjustment tool to achieve the Triennial goal of 11%

Q: What if you do not meet the 11.9% program goal at the end of the triennial?

A: Metropolitan Council will continue to analyze data and work to remedy reasons for utilization shortfall

Q: Can you be penalized if you do not meet the goal?

A: No, recipients cannot be penalized for not meeting their goal if they administer their DBE program in good faith.

Q: Will you increase the goal for the next triennial if you exceed the 11.9% program goal?

A: Possibly. Triennial goals are calculated using the relative availability of DBE firms in the marketplace and the forecasted makeup of capital projects, both of which vary from year to year.

Q: Are any efforts being taken to increase the DBE pool?

A: Yes, Metropolitan Council Office of Equity and Equal Opportunity is taking steps to identify industry gaps for which there are limited firms to perform the work and utilizing industry resources to proactively seek firms that may fill this need.

Q: Why is the Metropolitan Council taking this approach?

A: Historically EPA recipients have been required to establish and administer a DBE program and create a DBE triennial goal. Though the EPA suspended the requirement in 2019, The Metropolitan Council is in the process of updating our internal policy that will allow the Council to adopt FTA DBE program requirements into our EPA program processes and procedures. It is important to the Council to maintain this practice, as these goals establish a standard of expectation that is critical in the support of certified small businesses.

Q: To what activities does this goal apply?

A: All construction, design, professional services, and goods contracts that anticipate using EPA dollars within the next three years.

Q: What is the DBE program? / What is the purpose of the DBE program?

A: The EPA DBE program is a subcontracting program that exists to mitigate the effects of past discrimination, provide access and is designed to level the playing field for businesses owned by women, people of color and indigenous persons (DBEs)

Q: Where can I go to learn more about the DBE program generally?

A: <https://metro council.org/About-Us/Organization/Office-of-Equal-Opportunity/Small-Business-Programs/Disadvantaged-Business-Program.aspx>, or email dbemetc.state.mn.us

Q: How can I get more involved with the DBE program at the Met Council?

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