



## **DISADVANTAGED BUSINESS ENTERPRISE (DBE) TRIENNIAL GOAL SETTING METHODOLOGY FOR FISCAL YEARS 2026-2028**

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**Cleveland Department of Port Control / Cleveland Airport System (CAS)**  
**DBE Triennial Goal Setting Methodology**  
**FFY 2024 – FFY 2025 - FFY 2026**

## Introduction

The City of Cleveland through its Department of Port Control (DPC) is the sponsor of Cleveland Hopkins International Airport and Burke Lakefront Airport collectively referred to as Cleveland Airport System (CAS).

The CAS has prepared this document to describe the methodology used to establish its overall Disadvantaged Business Enterprise (DBE) goal for the Federal Aviation Administration (FAA) assisted contracts in accordance with Title 49 Code of Federal Regulations Part 26, Section 26.45. The CAS performed a thorough analysis of the relative availability of DBEs to participate in our DOT-assisted contracts by using historical contracts and payment data, the Ohio UCP Directory of Certified DBEs, and the Census Bureau Business database.

## Proposed Overall Three-Year Goal

The CAS has set its overall three-year (3) DBE goal for periods beginning October 1, 2026, and ending September 30, 2028, at **8.18%**, to be accomplished through **7.08%** Race-Conscious (RC) and **1.10%** Race-Neutral (RN) measures. This goal will apply to all FAA-assisted contracts and represents the relative availability of DBEs based on evidence of ready, willing, and able DBEs in relationship to all comparable businesses, which are known to be available to compete in FAA-assisted contracts.

The estimated FAA-assisted contracts for the next three (3) years are expected to consist of three (3) projects as listed in **Table 1**. Anticipated additional contracting projects may be undertaken if additional revenue becomes available and the overall DBE goal will be adjusted if necessary.

**Table 1: Anticipated FAA-Assisted Contracts for FY2026-FY2028**

<b>Federal Fiscal Year</b>	<b>FAA-Assisted Contracts</b>	<b>Expected Project Contracts</b>		<b>Expected Project Contract</b>
2026	\$8,000,000	1	Runway 6R/24L Design	\$8,000,000
2027	\$10,000,000	2	Taxiway G, G1, G2	\$10,000,000
2028	\$55,000,000	3	Runway 6R/24L Construction	\$55,000,000
<b>Overall Total/Column</b>	<b>\$73,000,000</b>			<b>\$73,000,000</b>

## Market Area

The CAS determined the State of Ohio and surrounding states as its geographical market area.

## Methodology

### **Step 1 – Calculation of the Base Figure**

The USDOT DBE regulations, 49 CFR Part 26 require using a two-step process for setting the overall DBE goal that reflects the level of DBE participation. The DBE goal methodology considers relevant data within the CAS business market in determining the level of participation that the CAS could expect in the absence of discrimination or other socio-economic barriers. Step 1 in the goal

setting process is the calculation of a base figure for the relative availability of DBEs and non-DBEs in the relevant market area. In Step 2, the CAS requires examining all relevant evidence to determine any needed adjustments to the base figure to arrive at an overall goal. Once the adjusted overall goal is determined, the process requires considering what portion of the goal will be met by race and gender-neutral measures. The method used to calculate the relative availability was gathered from the certified ready, willing and able DBE, small and minority firms available to perform a commercially useful function on federally assisted projects let by the CAS. The total number of all ready, willing and able businesses available in the local market area was gathered from the databases of the Ohio Unified Certification Program (UCP) and the United States Census Bureau County Business Pattern (CBP).

$$\text{Base Figure} = \frac{\text{Total \# of Ready, Willing and Able DBEs}}{\text{Total \# of ALL ready, willing and able}}$$

For the numerator: DBE Database from the Ohio UCP

Website: <https://www.dot.state.oh.us/Divisions/ODI/SDBE/Pages/DBE-Directory.aspx>

For the denominator: US Census Bureau's Business Pattern Database.

Website: <https://data.census.gov>

The NAICS Codes in the following areas were used based on the scope of work of anticipated AIP funded contracts for FY2026 – FY2028 as listed in Table 2:

**Table 2: Anticipated NAICS Codes and Description**

NAICS	NAICS Description	OH UCP Directory	Census
237110	Water and sewer line and related structures construction	65	281
237130	Power and communication line and related structures construction	17	172
237310	Highway, street, and bridge construction	149	305
237990	Other heavy and civil engineering construction	239	116
238110	Poured concrete foundation and structure contractors	57	850
238120	Structural steel and precast concrete contractors	54	106
238210	Electrical contractors and other wiring installation contractors	138	1913
238910	Site preparation contractors	63	1408
238991	Demolition/Pavement/Replacement	103	1044
327320	Ready-mix concrete manufacturing	3	182
339950	Sign manufacturing	12	217
484110	General freight trucking, local	57	850
484121	General freight trucking, long-distance, truckload	33	1898
484220	Trucking, Local	236	1263
541330	Engineering services	152	1674
541340	Drafting Services	36	54
541360	Geophysical surveying and mapping services	15	21
541370	Surveying and mapping (except geophysical) services	38	187
541380	Testing laboratories	31	302
541611	Administrative management and general management consulting services	12	1674
541990	All other professional, scientific, and technical services	66	285
561730	Landscaping services	40	80
561990	All other support services	42	539
	Total/s Per Column	1658	15421

## Weighted Base Figure

Following the FAA recommendations from the “Tips for Goal Setting in the Disadvantaged Business Enterprise (DBE) Program” the relative availability was weighted based on the dollar amount projected to be spent on each NAICS code.

$$\text{Weighted Base Figure} = \text{Weight} \times \text{Relative Availability}$$

Dividing the weighted DBE totals by the total estimate for all trades gives a base DBE availability figure for the projects anticipated during the goal-setting period. This figure is expressed as a percentage and serves as the basis for the three-year overall goal. A weight was calculated based on the projected dollars assigned to each NAICS code. Then, for each NAICS code, the percentage of relative DBE availability was multiplied times the corresponding weight. As shown in **Table 3**, the weighted DBE availability is 8.15% based on anticipated federal funding projects.

**Table 3: Weighted Base Figure Analysis by Contract**

Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Column 8	Column 9	Weight	Weighted Average Availability
Contract#1	Trade Description	NAICS Description	NAICS	Trade (\$)	Census	Director y	DBE (%)	DBE (\$) (= Trade \$ x DBE %)		
Runway 6R/24L Design	Geotechnical Engineering	Engineering Services	541330	\$400,000	1674	152	9.08%	\$36,320.19		
	Topographic Surveying	Surveying and Mapping	541370	\$864,000	187	38	20.32%	\$175,572.19		
	Analytical or Diagnostic Testing	Testing and Laboratory Services	541380	\$1,136,000	302	31	10.26%	\$116,609.27		
	Drafting Services	Drafting Services	541990	\$320,000	127	285	44.56%	\$142,596.49		
	Cost Estimating	Administrative Management and General Consulting Services	541611	\$5,280,000	1674	12	14.64%	\$773,084.11		
<b>Total Contract #1</b>				<b>\$8,000,000</b>	<b>4374</b>	<b>630</b>		<b>\$1,244,182.26</b>	<b>10.96%</b>	<b>1.06%</b>
<b>Total FFY 2026</b>				<b>\$8,000,000</b>				<b>1,244,182.26</b>		
Taxiway G, G1, G2 Design	Geotechnical Engineering	Engineering Services	541330	\$500,000	1674	152	9.08%	\$45,400.24		
	Topographic Surveying	Surveying and Mapping	541370	\$1,080,000	187	38	20.32%	\$219,465.24		
	Analytical or Diagnostic Testing	Testing and Laboratory Services	541380	\$1,420,000	302	31	10.26%	\$145,761.59		
	Cost Estimating	Administrative Management and General Consulting Services	541990	\$400,000	285	127	44.56%	\$178,245.61		
	Design/Construction Administration	Administrative Management and General Consulting Services	541611	\$6,600,000	1926	282	14.64%	\$966,355.14		
<b>Total Contract #2</b>				<b>\$10,000,000</b>	<b>4374</b>	<b>630</b>		<b>\$1,555,227.82</b>	<b>13.70%</b>	<b>1.98%</b>
<b>Total FFY2027</b>				<b>10,000,000</b>				<b>\$1,555,227.82</b>		
Runway 6R/24L Construction	Excavation/Demolition/Removal	Site Preparation	238910	\$9,350,000	1408	63	4.47%	\$418,359.38		

	Base Layer	Poured Concrete Structural Steele	238120	\$8,250,000	106	54	50.94%	\$4,202,829.96		
	Electrical Wiring	Electrical Contractor	237210	\$4,950,000	1913	61	3.19%	\$157,841.08		
	Pavement Concrete	Poured Concrete	238110	\$17,050,000	850	57	6.71%	\$1,143,352.96		
	Hauling	Trucking	484220	\$3,300,000	1263	236	18.69%	\$411,084.59		
	Marking, paintings, signage	Paintings, Markings, Signage	237310	\$7,700,000	305	149	48.85%	\$3,761,639.43		
	Seeding, sod laying	Landscaping Services	561730	\$4,400,000	4163	62	1.49%	\$65,529.67		
<b>Total Contract#3</b>				<b>\$55,000,000</b>				<b>\$10,160,637.07</b>	<b>75.34%</b>	<b>5.11%</b>
<b>Total FFY2028</b>				<b>\$55,000,000</b>				<b>\$10,160,637.07</b>		

Grand Total	Trade (\$)	DBE (\$)	Weighted DBE Availability
	<b>\$73,000,000</b>	<b>\$12,960,047</b>	<b>8.15%</b>

## Step 2: Adjustments to the Step 1 Base Figure

The CAS considered past participation to adjust the base figure of the relative availability of DBEs in Step 1, if any, to arrive at the overall goal. In **Table 4**, the historical DBE participation data were arranged from low to high and arrived at **8.2%** median value, which became the figure used for the Step 2 adjustment to the base figure.

**Table 4: Dollar Value of Past Race Conscious Participation**

Fiscal Year	Total Contract Amount	Race Conscious DBE Achievement
FY 2023	0.0%	0.0%
FY 2022	5.1%	4.4%
FY 2020	9.3%	8.2%
FY 2021	11.2%	9.2%
FY 2024	15.7%	20.1%

$$\begin{aligned}
 \text{Step 2 adjustment} &= \text{Base Figure} + \text{Median of DBE Past Participation} / 2 \\
 &= 8.15\% + 8.2\% / 2 \\
 &= \underline{\underline{8.18\%}}
 \end{aligned}$$

The adjusted overall goal of **8.18%** is the overall goal for the Cleveland Airport System.

Furthermore, there are no relevant disparity studies applicable to the CAS contracting program and market area.

## Use of Race-Neutral Methods and DBE Contract Goals

CAS will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating race-neutral DBE participation, including those set out in 49 CFR§26.51(b). Race-neutral DBE participation includes any time a DBE wins a prime contract through customary competitive procurement procedures or is awarded a subcontract on prime contract that does not carry a DBE contract goal.

**Table 5** details DBE utilization, measured by actual commitments on contracts completed from FY 2020 to FY2024. The median race and gender-neutral DBE utilization achieved by CAS was **1.1%**.

**Table 5: Dollar Value of Past Race-Neutral Participation**

Fiscal Year	Total Contract Amount	Race Neutral DBE Achievement
FY 2023	0.0%	0.0%
FY 2022	5.1%	.6%
FY 2020	9.3%	1.1%
FY 2021	11.2%	2.0%
FY 2024	25.3%	5.2%

The CAS estimates that in meeting the established overall goal of 8.18%, it will obtain 1.1% from RN participation and 7.08% through RC measures.

CAS will adjust the estimated breakout of race-neutral and race-conscious DBE participation as needed to reflect actual DBE participation and will track and report race-conscious and race-neutral participation separately. For reporting purposes, race-neutral DBE participation includes, but is not necessarily limited to the following: DBE participation through a prime contract obtained through customary competitive procurement procedures; DBE participation through a subcontract on a prime contract that does not carry a DBE goal, DBE participation on a prime contract exceeding a contract goal, and DBE participation through a subcontract from a prime contractor that did not consider a firm's DBE status in making the award.

### **Breakout of Estimated Race-Neutral (RN) and Race-Conscious (RC) Participation**

The CAS will meet the maximum feasible portion of the overall goal by using RN means of facilitating DBE participation. Below are the measures that will be taken to achieve this. The measures will also facilitate small business participation in general in keeping with the requirements of 49 CFR Part 26.39 (<https://www.ecfr.gov/current/title-49/section-26.39>) and the aim of the CAS's small business element (SBE) as detailed in Attachment 6 of its DBE program plan.

1. Participating in solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitates DBE, and other small businesses, participation;
2. Providing assistance in overcoming limitations such as inability to obtain bonding or financing;
3. Providing technical assistance and other outreach services;
4. Carrying out information and communications programs on contracting procedures and specific contract opportunities;
5. Implementing a supportive services program to develop and improve immediate and long-term business management, record keeping, and financial and accounting capability for DBEs and other small businesses;
6. Providing services to help DBEs and other small businesses improve long-term development, increase opportunities to participate in a variety of kinds of work, handle increasingly significant projects, and achieve eventual self-sufficiency;
7. Establishing a program to assist new, start-up firms, particularly in fields in which DBE participation has historically been low;
8. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors;
9. Assist DBEs and other small businesses, to develop their capability to utilize emerging technology and conduct business through electronic media.

## **Public Participation and Consultation**

CAS is firmly committed to its DBE program. As part of this continuing effort, CAS staff will seek and obtain input from minority, women, and general contractor groups; community organizations; and other officials who have a vested interest in the performance and success of the DBE program through work on Airport contracts. These stakeholders will include:

1. The City of Cleveland Office of Equal Opportunity (OEO)
2. Black Page Ohio/The Summit Magazine
3. Northeast Ohio Regional Sewer District (NEORSO)
4. The Urban League of Greater Cleveland
5. The Greater Cleveland Partnership (GCP)
6. Northeast Ohio Hispanic Center for Economic Development (NEOHCED)
7. The National Association of Women in Construction (NAWIC)
8. Contractors Assistance Association (CAA)
9. Aerozone Alliance
10. Greater Cleveland Regional Transit Authority (GCRTA)

The CAS has issued an invitation for a virtual public meeting regarding the proposed goal for the purpose of consulting with stakeholders on June 19, 2025, Thursday @ 10:00am using Microsoft Teams.

## **Process and Notice of Goal**

In accordance with 49 CFR Part 26, the Cleveland Department of Port Control, Cleveland Airport System (CAS) has established a proposed Triennial Disadvantaged Business Enterprise (DBE) Goal and Methodology on its Federal Aviation Authority assisted contracts for Federal Fiscal Years 2026 - 2028. The proposed overall goal of **8.18%**, with **7.08%** Race-Conscious and **1.1%** Race-Neutral measures derived from analyzing past, current and future DBE utilization. The Methodology will be published on the CAS's website available for inspection and comments within 30 calendar days from June 18, 2025 to July 18, 2025 during normal business hours. Comments on the DBE goal are accepted within that specified period and can be sent to the following:

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