



**OKLAHOMA**  
**Transportation**

**Draft Disadvantaged Business  
Enterprise Goal and Methodology for  
Federal Fiscal Years 2026-2028**

**a Federal Transit Administration  
Obligation**

**EXECUTIVE SUMMARY**

**Oklahoma Department of Transportation (ODOT))** submits this Disadvantaged Business Enterprise (DBE) triennial DBE goal and methodology to the Federal Transit Administration (FTA) for review and approval of the federal fiscal years (FFY) 2026 – 2028 Triennial DBE.

**The proposed DBE overall goal for FTA assisted contracts is 0.26% race neutral.** ODOT will make good faith efforts to meet the overall DBE goal each year during the triennial period.

ODOT used the best available information for FTA funded procurements proposed in the next three years, as well as data sets from the State of Oklahoma DBE directory and the 2022 US Census Bureau to establish DBE availability. This FFY 2026-2028 goal and methodology includes ODOT and the 19 subrecipients who are authorized to use Section 5311 FTA funds for transit related procurement opportunities during the DBE goal period.

The goal was derived in the following manner:

- A weighted base DBE goal of 0.26% was computed
- Public comment and participation was solicited for 30 days
- The past participation did not change the weighted base DBE goal of 0.26%
- Public participation held on

## INTRODUCTION

ODOT is an FTA Tier 1 Recipient. ODOT and with its sub-recipients, will award prime contracts (excluding transit vehicle purchases) the cumulative total value of which exceeds \$670,000 in FTA funds in an FFY. As a Tier I Recipient, ODOT is required to prepare the triennial overall DBE goal and methodology.

This report details ODOT's process for setting the FFY 2026, 2027 and 2028 overall goal for DBE participation in FTA related transit projects. The goal setting methodology complies with the DBE rule set forth in the Code of Federal Regulations, 49 CFR Part 26.45.

ODOT is not an operator of public transportation services, however, through its administration of FTA grants, financial and technical assistance is provided to Oklahoma's public transportation providers, known as the sub-recipients. ODOT has 19 sub-recipients who will receive FTA 5311 funding during the DBE goal period. The sub-recipients are required to comply with the requirements of 49 CFR Part 26, adopt and administer the ODOT DBE Program plan and overall DBE goal and methodology, unless the sub-recipient is a direct recipient of FTA funds and has a current USDOT Operating Administration approved DBE program and overall goal.

The Office of Mobility and Public Transit Division ([OMPTD](#)) is the ODOT division responsible for managing funds from FTA. These funds are used for the planning, development, operation, and integration of transit and rail into the statewide transportation system. OMPTD passes through FTA grants to sub-recipients to provide transit services through the 5310—Seniors and People with Disabilities and 5311 – Rural Transit Providers programs. The OMPTD solicits interest from non-profits and government agencies to submit a grant application for a 5310 and or 5311 grant award.

### **5310– Seniors and People with Disabilities**

The FTA provides ODOT with Section 5310 grant funds for small urban and rural areas annually through the capital assistance program. **5310 Program funds are exclusively used to purchase transit vehicles.** The 5310 sub-recipients who procure transit vehicles with 5310 grant funds will not be included in the calculation of the triennial overall DBE goal or required to complete the Uniform Report of Awards or Commitments and Payments reports for its 5310 grant.

### **5311 Rural Transit Providers**

On an annual basis, the FTA allocates federal funds for the Section 5311 grant program. **5311 Program funds support the administrative, operating and capital costs of public transit services in rural areas.** Sub-recipients of 5311 are required to comply with ODOT's DBE program and report on DBE contracting activities. The OMPTD is responsible for the oversight on 5311 sub recipients to ensure DBE Program compliance.

For a list of active 5310 and 5311 sub recipients, visit the ODOT Office of Mobility and Public Transit Division website.

### **ODOT Point of Contact**

The FFY 2026-2028 DBE goal and methodology submission includes a description of the methodology used to establish the goal, including the base figure and the evidence by which it was calculated, evidence relied upon for any adjustments to the base figure, and a projection of the portions of the overall goal expected to be met through race-neutral measures, respectively.

For questions or comments about the FTA focused FFY 2026-2028 DBE goal, contact:

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## II. FTA-ASSISTED CONTRACTING PROGRAM FOR FFY 2026-2028

ODOT with its sub-recipients, collectively identified approximately **\$28,220,719** in procurement opportunities to provide public transit services in rural areas for FFY 2026-2028. Of the \$28,220,719, FTA allocated approximately **\$15,612,616** for FFY 2026-2028 under the Section 5311 grant program to assist with awarding procurements for public transit services in rural areas. The FTA financially assisted procurements will be procured by ODOT and 19 sub-recipients who receive **5311 Program funds that support the administrative, operating and capital costs of public transit services in rural areas.**

The sub-recipients proposed to procure supplies and services with the 5311 Program funding during FFY 2026-2028 are:

1. Beaver City Transit
2. Call A Ride Public Transit
3. Central Oklahoma Community Action Agency
4. CPTS—Cimarron Public Transit System
5. Northern Oklahoma Development Authority dba Cherokee Strip Transit
6. Delta Transit
7. Logan County Historical Society, Inc. dba First Capital Trolley
8. Guymon- The Ride
9. INCA Community Services JAMM Transit
10. KI BOIS Area Transit System
11. LIFT Transit
12. MAGB Transportation, Inc.
13. Muskogee County Transit
14. OSU-Stillwater Community Transit
15. Grand Gateway / Pelivan Transit
16. Community Action Development Corporation dba Red River Transportation
17. Big Five Community Services, Inc.
18. Southwest Transit (Southwest Oklahoma Community Action Group, Inc.)
19. Washita Valley Transit

**Table 1** represents the total value of procurements, during FFY 2026-2028, at **\$28,220,719.00** and the FTA share of the procurements at **\$15,612,616**. The table identifies the North American Industry Classification System (NAICS) Code for each procurement, the overall value of the procurement and the FTA contribution towards the proposed procurements.

**TABLE 1**

NAIC Code	ODOT and Sub-recipient Procurement Description	Procurement Value	Fed Share Value
237130	Utilities	\$75,000.00	\$100
238990	All Other Specialty Trade Contractors	\$40,000.00	\$34,000
323111	Printing and related support	\$99,420.00	\$53,281
334511	Vehicle Tracking Devices	\$18,600.00	\$9,300
423390	Construction Material Merchant (minor construction repair supplies)	\$2,500.00	\$1,250
423420	Office Equipment	\$322,795.00	\$138,697
423430	Computers, peripheral equipment and software	\$275,200.00	\$110,900
423610	Electrical apparatus and equipment (wiring & supplies)	\$500.00	\$250
424320	Uniforms sales, rentals cleaning	\$89,500.00	\$44,750
424720	Oil and lubricants	\$490,500.00	\$269,550
441310	General Transit vehicle Repair, parts and Maintenance	\$5,597,114.00	\$3,428,538
441320	Tires	\$652,200.00	\$386,000
442110	Office Furnishings	\$64,500.00	\$25,375
447190	Fuel	\$9,458,774.00	\$4,896,887
453210	Office supplies	\$517,505.00	\$250,300
485113	Third party Transit Service agreements	\$30,000.00	\$15,000
517311	Telephone & Internet - Wired telecommunications	\$617,000.00	\$308,500
517312	Cell Phones - Wireless telecommunications	\$14,000.00	\$7,000
524126	Building Insurance	\$7,528,611.00	\$3,924,505
541110	Legal Services	\$81,164.00	\$36,746
541211	Audit – Accounting Services	\$205,943.00	\$97,754
541611	Professional Consulting Services	\$1,287,000.00	\$1,056,500
541810	Advertising	\$5,328.00	\$4,262
561210	Facility Support Services	\$20,500.00	\$10,250
561621	Security alarm, installation and repair	\$16,300.00	\$11,390
561710	Pest Control Services	\$27,600.00	\$12,550
561720	Janitorial Services	\$24,500.00	\$12,250
561730	Landscape Services	\$50,500.00	\$25,250
611430	Training Programs	\$256,933.00	\$155,998
621511	Alcohol/Drug Testing	\$240,500.00	\$209,000
811310	Building Maintenance/Repair	\$110,731.00	\$76,585
		<b>\$28,220,719.00 Total Value</b>	<b>\$15,612,616.00 (FTA Value)</b>

The triennial DBE goal and methodology for FFY 2026-2028 is based on the proposed level of **\$15,612,615** in FTA financial assistance under the 5311 program during the period of October 1, 2025, through September 30, 2028 (FFYs 2026, 2027 and 2028).

In establishing the overall DBE goal, ODOT complied with 49 CFR 26.45 by following a two-step process for analyzing relevant data.

***Step 1: Determination of a Base Figure (26.45)<sup>1</sup>***

To determine the DBE base figure, ODOT had to first identify the availability of DBEs, also known as the numerator and the availability of non-DBEs, also known as the denominator.

- ⇒ ***For the numerator: DBEs found in the Oklahoma DBE Database of Certified Firms***
- ⇒ ***For the denominator: Non-DBES including DBEs found in the 2022 U.S. Census Bureau's County Business Pattern Database***

To establish the base figure of the relative availability of DBEs to all comparable firms (DBE and Non-DBEs) available to propose on the FFYs 2026-2028 FTA-assisted contracting opportunities; ODOT recognized all sub-recipients and the vendors who do business with the sub-recipients are located in the rural areas of the state of Oklahoma. To determine the relevant geographic market area, ODOT analyzed where each sub-recipient is vested in and the general business location of their vendors as identified from the procurement data used to complete the 2022, 2023, and 2024 Uniform report of DBE Awards or Commitments and Payments reports (semi-annual report). Approximately, 87.6% of contracts were awarded to firms located within the geographic boundary of the State of Oklahoma. Therefore, the State of Oklahoma was determined to be the geographic market area for DBE and non-DBE availability to pursue FTA funded procurements.

ODOT used the ODOT DBE Directory to identify the availability of DBEs with at least one associated NAICS codes. The ODOT DBE Directory identified 82 DBEs with an associated NAICS codes. The 82 DBEs became ODOT's numerator.

ODOT then sought the availability of non-DBEs in the state of Oklahoma that matched at least one of the 31 NAICS codes. ODOT used the ***2022 U.S. Census Bureau County Business Patterns Database*** to identify the number of non-DBEs in the state with the associated NAICS codes. The census bureau data identified 10,378 firms with the associated NAICS codes. The 10,378 non-DBEs plus the 82 DBEs became ODOT's denominator of 10,460 firms in the pursuit of FTA funded procurements.

To determine the overall relative availability of DBEs, ODOT divided the numerator<sup>2</sup> representing the ratio of ready, willing, and able DBE firms, by the denominator<sup>3</sup> representing all non-DBEs available including DBEs in each NAICS code. Application of this formula is:

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<sup>1</sup> §26.45 represents Title 49 CFR Part 26 regulatory referenced section.

<sup>2</sup> Numerator represents all DBE firms established within the ODOT's market area.

<sup>3</sup> Denominator represents all comparable available established firms.

***82 Number of Ready, Willing and Able DBEs (Numerator)***

***10,460 Number of All Available Firms including DBEs (Denominator)***

ODOT further divided the numerator by the denominator; per each NAICS code to establish the “Relative Availability” percentage of DBEs.

**Table 2** represents the 31 NAICS codes; Description of Work; Number of DBEs – Numerator, Number of all firms Denominator, and DBE Relative Availability.

***Table 2***

NAIC Code	ODOT and Sub-recipient Procurement Description	DBEs in ODOT UCP	All firms in 2022 Census Bureau	DBE Relative Availability
237130	Utilities	1	165	0.61%
238990	All Other Specialty Trade Contractors	21	418	5.02%
323111	Printing and related support	2	147	1.36%
334511	Vehicle Tracking Devices	1	6	16.67%
423390	Construction Material Merchant (minor construction repair supplies)	3	38	7.89%
423420	Office Equipment	1	110	0.91%
423430	Computers, peripheral equipment and software	0	58	0.00%
423610	Electrical apparatus and equipment (wiring & supplies)	1	154	0.65%
424320	Uniforms sales, rentals cleaning	0	12	0.00%
424720	Oil and lubricants	0	65	0.00%
441310	General Transit vehicle Repair, parts and Maintenance	0	553	0.00%
441320	Tires	0	285	0.00%
442110	Office Furnishings	0	218	0.00%
447190	Fuel	0	211	0.00%
453210	Office supplies	0	63	0.00%
485113	Third party Transit Service agreements	0	4	0.00%
517311	Communication- Telephone & Internet - Wired telecommunications carriers	0	395	0.00%
517312	Cell Phones - Wireless telecommunications	0	368	0.00%
524126	Building Insurance	0	129	0.00%
541110	Legal Services	1	2255	0.04%
541211	Audit – Accounting Services	1	794	0.13%
541611	Professional Consulting Services	14	1010	1.39%
541810	Advertising	6	125	4.80%
561210	Facility Support Services	1	107	0.93%



561621	Security System (alarm, installation and repair)	2	113	1.77%
561710	Pest Control Services	0	265	0.00%
561720	Janitorial Services	8	601	1.33%
561730	Landscape Services	12	1020	1.18%
611430	Training Programs	6	50	12.00%
621511	Alcohol/Drug Testing	1	217	0.46%
811310	Building Maintenance/Repair	0	422	0.00%

ODOT next calculated a *weighted base figure* to help ensure the Step 1 calculation is as accurate as possible. Application of the weighted base figure is:

**Weight (% of total FTA funds per NAICS code) x Relative Availability of DBEs = Weighted Base Figure**

*Table 3* calculates the weight DBE relative availability for each of the 31 procurement categories multiplied by the weighed federal value in order to determine the DBE *weighted base figure*.

**TABLE 3**

NAIC Code	DBE Relative Availability	Multiplied	Weighting (Total Fed Value)	DBE Weighted Base Figure
237130	0.61%	x	0.00%	0.00%
238990	5.02%	x	0.22%	0.01%
323111	1.36%	x	0.34%	0.00%
334511	16.67%	x	0.06%	0.01%
423390	7.89%	x	0.01%	0.00%
423420	0.91%	x	0.89%	0.01%
423430	0.00%	x	0.71%	0.00%
423610	0.65%	x	0.00%	0.00%
424320	0.00%	x	0.29%	0.00%
424720	0.00%	x	1.73%	0.00%
441310	0.00%	x	21.96%	0.00%
441320	0.00%	x	2.47%	0.00%
442110	0.00%	x	0.16%	0.00%
447190	0.00%	x	31.36%	0.00%
453210	0.00%	x	1.60%	0.00%
485113	0.00%	x	0.10%	0.00%
517311	0.00%	x	1.98%	0.00%
517312	0.00%	x	0.04%	0.00%
524126	0.00%	x	25.14%	0.00%

541110	0.04%	x	0.24%	0.00%
541211	0.13%	x	0.63%	0.00%
541611	1.39%	x	6.77%	0.09%
541810	4.80%	x	0.03%	0.00%
561210	0.93%	x	0.07%	0.00%
561621	1.77%	x	0.07%	0.00%
561710	0.00%	x	0.08%	0.00%
561720	1.33%	x	0.08%	0.00%
561730	1.18%	x	0.16%	0.00%
611430	12.00%	x	1.00%	0.12%
621511	0.46%	x	1.34%	0.01%
811310	0.00%	x	0.49%	0.00%
				<b>0.26% (DBE Weighted Base Figure)</b>

The Step 1 weighted DBE base figure is expressed as 0.26%.

## II. Step Two: Adjustments to the Base Figure - §26.45(d)

After establishing the Base Figure, ODOT reviewed and assessed other known evidence potentially impacting the relative availability of DBEs in the transit related services and commodities within the state of Oklahoma market area, in accordance with prescribed narrow tailoring provisions set forth under 49 CFR 26.45 Step 2: DBE Goal Adjustment guidelines.

Evidence considered in making an adjustment to the Base Figure included Past DBE Goal Participation, Evidence from Disparity Studies, and Other Evidence, as follows:

### A. Past DBE Goal Attainments

The following table below reflects the utilization of DBEs on FTA assisted contracts awarded by sub-recipients and ODOT within the last three (3) FFYs:

FFY	Attainment
<b>2022</b>	0%
<b>2023</b>	0%
<b>2024</b>	0%
Median of Past Attainments = 0%	

The median past participation is zero, therefore, no adjustment to the Base Figure is warranted. The DBE base figure remains at 0.26%.

## **B. Evidence from Disparity Studies**

Colette Holt & Associates (“CHA”) was retained by ODOT to perform a disparity study (Disparity Study) of its contracts funded by the Federal Highway Administration (FHWA) in conformance with strict constitutional scrutiny and the DBE program regulations at 49 CFR Part 26. The Disparity Study analyzed contracting data from ODOT’s FHWA financial assistance program that is primarily for major highway related construction. The FHWA contracting program is not comparable to ODOT’s FTA procurement program that is focused on **5311 Program funds to support the administrative, operating and capital costs of public transit services in rural areas**. Therefore, the Disparity Study was not used to make an adjustment to the DBE base figure goal because of the lack of relevance in the type of procurements between FTA funded and FHWA funded.

## **C. Other Evidence**

In addition to quantitative data, anecdotal evidence of firms’ marketplace experiences is relevant to evaluating whether the effects of current or past discrimination continue to impede opportunities for DBE firms such that race-conscious contract goals are needed to ensure equal opportunities to compete for ODOT contracts. To explore this type of anecdotal evidence, ODOT is hosting a 30-day public participation period for comments through July 18, 2025, and a public virtual outreach event on June 26, 2025.

Results from the public participation period and outreach event will be considered for any adjustments to the proposed DBE goal.