

Federal Disadvantaged Business Enterprise (DBE) Program Proposed Overall Goal & Methodology for Federal Fiscal Years 2027 and 2028

The California Department of Transportation (Caltrans) must prepare and submit a Goal and Methodology document to the United States Federal Transit Administration (FTA) that presents its overall DBE goal for FTA-funded work. For FFYs 2026 through 2028, Caltrans initially established an overall DBE goal of 6.7 percent, which it submitted to FTA for approval in May 2025, in accordance with the guidance provided by the United States Department of Transportation (USDOT) in 49 Code of Federal Regulations (CFR) Part 26.45, USDOT's "Tips for Goal-Setting," and other official USDOT guidance.

However, on October 3, 2025, USDOT issued an Interim Final Rule 2025 (IFR 2025) that amends Title 49 CFR Part 26 to redefine the term social disadvantage and to make corresponding changes to the certification criteria, goal setting, and reporting requirements associated with the Federal DBE Program.¹ Most notably, USDOT removed the presumption of disadvantage for businesses owned by people of color (POCs) and women as part of its definition of social disadvantage and has set forth the following requirements as part of doing so:

- Certifying agencies must reevaluate businesses certified as DBEs before the release of IFR 2025 to ensure that they meet the criteria for experiencing social disadvantage with no regard to race or gender;
- Certifying agencies must develop a process to accept and assess personal narratives that certification applicants—regardless of the race or gender of their owners—submit to demonstrate their social disadvantage;
- USDOT fund recipients cannot set or enforce their overall DBE goals while their recertification process is ongoing, and organizations must set new goals when they have completed their processes; and
- USDOT fund recipients must pause their use of DBE contract goals in awarding individual contracts or concession opportunities while their recertification processes are ongoing.

To comply with USDOT's updated regulations for the implementation of the Federal DBE Program, Caltrans is required to develop a new overall DBE goal for its FTA-funded projects for FFYs 2027 through 2028. Based on the analyses described in this document, Caltrans proposes an overall DBE goal for FFYs 2027 through 2028 of 0.08 percent.

A. Overall DBE Goal

¹IFR 2025 is available online at <https://www.transportation.gov/mission/civil-rights/disadvantaged-business-enterprise/DBE-IFR-10-03-2025>. USDOT released answers to frequently asked questions about IFR 2025 later in October 2025, available online at https://www.transportation.gov/sites/dot.gov/files/DBE_IFR_FAQs.pdf.

Caltrans based its new overall DBE goal on contract analyses from the 2025 Caltrans FTA Disparity Study (referred to herein as the Disparity Study) conducted by BBC Research & Consulting (BBC); data about the businesses in Caltrans' marketplace that perform work related to the goods and services that the agency procures; and conditions in the local marketplace for socially and economically disadvantaged businesses. The agency followed the required two-step goal-setting methodology to develop its new goal: 1) establish a base figure; and 2) consider whether a step-2 adjustment to the base figure is warranted.

1. Base figure

Caltrans began the goal-setting process by establishing a base figure. To help Caltrans determine the base figure, BBC examined 58 FTA-funded prime contracts and subcontracts (referred to collectively as contract elements), which accounted for approximately \$92.4 million worth of work Caltrans awarded from January 1, 2021, through September 30, 2023 (i.e., the study period). A key assumption of the availability analysis used to calculate the base figure is that the FTA-funded work Caltrans awarded during the study period is representative of the FTA-funded work it will award in the future.² Caltrans reviewed the contract elements included in the availability analysis and verified that the characteristics of projects awarded during the study period are similar to those of the FHWA-funded projects it anticipates awarding in FFYs 2027 through 2028. The agency assigned a North American Industry Classification System (NAICS) code to each contract element that represents work it anticipates awarding in FFYs 2027 and 2028. Figure 1 shows each NAICS code associated with the work Caltrans anticipates awarding in FFYs 2027 and 2028 and the contract dollars Caltrans predicts will be attributed to each corresponding work type.

Caltrans then identified the number of ready, willing, and able DBEs working in each relevant NAICS code using the California Unified Certification Program (CUCP) Directory of Certified Firms.³⁴ Per 49 CFR § 26.81 (a), Caltrans serves as one of many agencies responsible for DBE certifications in the state of California and maintains the CUCP Directory per 49 CFR § 26.81 (g). In addition, Caltrans used the United States Census Bureau's Statistics of United States Businesses

²Consistent with USDOT guidance, Caltrans considers any contract with at least \$1 of FTA funding as an "FTA-funded contract" and includes the total value of the contract in its pool of total FTA-funded contracting dollars.

³Caltrans considered the state of California to be the relevant geographic market area for relevant NAICS codes.

⁴California Unified Certification Program Directory available at <https://dot.ca.gov/programs/civil-rights/dbe-certification-information>. Caltrans used the CUCP Directory as of July 29, 2026, to calculate DBE availability.

database to determine the number of all firms ready, willing, and able to perform work in relevant NAICS codes.⁵

Figure 1. Projections of dollars associated with FTA-funded contract elements for relevant NAICS codes, FFYs 2027 and 2028

Table showing projected FTA-funded contract dollars by NAICS code for FFYs 2027 and 2028. Two columns: NAICS Code, and Total Dollars.

NAICS Code	Total Dollars
485111 - Mixed Mode Transit Systems	\$49,482,432
485113 - Bus and Other Motor Vehicle Transit Systems	\$33,918,386
485510 - Charter Bus Industry	\$5,251,258
561110 - Office Administrative Services	\$616,248
236220 - Commercial and Institutional Building Construction	\$523,616
541214 - Payroll Services	\$494,926
541614 - Process, Physical Distribution, and Logistics Consulting Services	\$412,849
238110 - Poured Concrete Foundation and Structure Contractors	\$248,000
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$221,340
332312 - Fabricated Structural Metal Manufacturing	\$180,000
238310 - Drywall and Insulation Contractors	\$157,020
541310 - Architectural Services	\$131,800
541330 - Engineering Services	\$87,800
444180 - Other Building Material Dealers	\$80,784
541320 - Landscape Architectural Services	\$78,460
238220 - Plumbing, Heating, and Air-Conditioning Contractors	\$75,888
811121 - Automotive Body, Paint, and Interior Repair and Maintenance	\$72,000
541611 - Administrative Management and General Management Consulting Services	\$59,370
458110 - Clothing and Clothing Accessories Retailers	\$37,617

⁵United States Census Statistics of United States Businesses available at <https://www.census.gov/programs-surveys/susb.html>. Caltrans used 2022 Statistics of U.S. Businesses data.

NAICS Code	Total Dollars
238390 - Other Building Finishing Contractors	\$29,900
541612 - Human Resources Consulting Services	\$28,500
541519 - Other Computer Related Services	\$26,270
238340 - Tile and Terrazzo Contractors	\$23,790
334220 - Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	\$23,002
423690 - Other Electronic Parts and Equipment Merchant Wholesalers	\$23,002
337110 - Wood Kitchen Cabinet and Countertop Manufacturing	\$21,356
541618 - Other Management Consulting Services	\$17,500
238320 - Painting and Wall Covering Contractors	\$15,500
449121 - Floor Covering Retailers	\$14,964
423610 - Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers	\$12,700
541511 - Custom Computer Programming Services	\$9,108
339950 - Sign Manufacturing	\$8,638
424120 - Stationery and Office Supplies Merchant Wholesalers	\$5,500
Total	\$92,389,525

Note: Amounts rounded to the nearest whole number.

Source: BBC and 2025 Caltrans Disparity Study.

Figure 2 presents the results of the calculation in which Caltrans divided the number of ready, willing, and able DBEs working in each NAICS code by the total number of all firms ready, willing, and able to perform work in the NAICS code. As shown in Figure 2, the total projected DBE availability for FTA-funded contracts Caltrans anticipates awarding in FFYs 2027 through 2028 is 0.05 percent ($\$42,111 / \$92.4 \text{ million} = 0.05\%$). Thus, Caltrans considers 0.05 percent as its base figure for its overall DBE goal for FFYs 2027 through 2028.

Figure 2. DBE dollar availability for each relevant NAICS code

Table showing DBE dollar availability by NAICS code. Six columns: NAICS Code, Projected Dollars, Total Number of Firms, Total Number of DBEs, DBE Availability Percent, and DBE Availability Dollar Amount.

NAICS Code	Projected Dollars	Total Firms	Total DBEs	DBE Availability (%)	DBE Availability (\$)
485111 - Mixed Mode Transit Systems	\$49,482,432	7	0	0.00%	\$0
485113 - Bus and Other Motor Vehicle Transit Systems	\$33,918,386	41	0	0.00%	\$0
485510 - Charter Bus Industry	\$5,251,258	172	0	0.00%	\$0
561110 - Office Administrative Services	\$616,248	4,623	35	0.76%	\$4,666
236220 - Commercial and Institutional Building Construction	\$523,616	4,198	41	0.98%	\$5,114
541214 - Payroll Services	\$494,926	557	1	0.18%	\$889
541614 - Process, Physical Distribution, and Logistics Consulting Services	\$412,849	1,131	36	3.18%	\$13,141
238110 - Poured Concrete Foundation and Structure Contractors	\$248,000	2,020	44	2.18%	\$5,402
238210 - Electrical Contractors and Other Wiring Installation Contractors	\$221,340	9,708	21	0.22%	\$479
332312 - Fabricated Structural Metal Manufacturing	\$180,000	264	6	2.27%	\$4,091
238310 - Drywall and Insulation Contractors	\$157,020	2,337	2	0.09%	\$134
541310 - Architectural Services	\$131,800	3,552	16	0.45%	\$594
541330 - Engineering Services	\$87,800	7,552	131	1.73%	\$1,523
444180 - Other Building Material Dealers	\$80,784	2,182	6	0.27%	\$222

NAICS Code	Projected Dollars	Total Firms	Total DBEs	DBE Availability (%)	DBE Availability (\$)
541320 - Landscape Architectural Services	\$78,460	919	18	1.96%	\$1,537
238220 - Plumbing, Heating, and Air-Conditioning Contractors	\$75,888	11,135	9	0.08%	\$61
811121 - Automotive Body, Paint, and Interior Repair and Maintenance	\$72,000	3,562	1	0.03%	\$20
541611 - Administrative Management and General Management Consulting Services	\$59,370	16,329	219	1.34%	\$796
458110 - Clothing and Clothing Accessories Retailers	\$37,617	4,450	2	0.04%	\$17
238390 - Other Building Finishing Contractors	\$29,900	885	5	0.56%	\$169
541612 - Human Resources Consulting Services	\$28,500	1,115	26	2.33%	\$665
541519 - Other Computer Related Services	\$26,270	1,207	36	2.98%	\$784
238340 - Tile and Terrazzo Contractors	\$23,790	1,748	1	0.06%	\$14
334220 - Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	\$23,002	142	0	0.00%	\$0
423690 - Other Electronic Parts and Equipment Merchant Wholesalers	\$23,002	1,960	0	0.00%	\$0
337110 - Wood Kitchen Cabinet and Countertop Manufacturing	\$21,356	731	0	0.00%	\$0

NAICS Code	Projected Dollars	Total Firms	Total DBEs	DBE Availability (%)	DBE Availability (\$)
541618 - Other Management Consulting Services	\$17,500	1,168	98	8.39%	\$1,468
238320 - Painting and Wall Covering Contractors	\$15,500	4,844	6	0.12%	\$19
449121 - Floor Covering Retailers	\$14,964	767	0	0.00%	\$0
423610 - Electrical Apparatus and Equipment, Wiring Supplies, and Related Equipment Merchant Wholesalers	\$12,700	1,304	14	1.07%	\$136
541511 - Custom Computer Programming Services	\$9,108	10,676	47	0.44%	\$40
339950 - Sign Manufacturing	\$8,638	598	6	1.00%	\$87
424120 - Stationery and Office Supplies Merchant Wholesalers	\$5,500	370	3	0.81%	\$45
Total	\$92,389,525			0.05%	\$42,111

Notes: Dollars rounded to the nearest whole number and percentages rounded to the nearest hundredth of one percent, and thus may not sum exactly to totals. Caltrans used the CUCP Directory as of July 29, 2026, to calculate DBE availability.

Source: Caltrans and BBC.

2. Step-2 adjustment

After establishing the base figure, Caltrans considered additional information to determine whether any adjustment was needed to the base figure to ensure the agency's new overall DBE goal is precise and reflects current conditions in the local marketplace for socially and economically disadvantaged businesses.

a. Adjustment considerations

In considering an adjustment to the base figure, the agency evaluated information about:

- The current capacity of DBEs to perform agency work;

- Marketplace conditions related to business success (e.g., employment, self-employment, education, training, and unions) for socially and economically disadvantaged businesses;
- Marketplace conditions related to access to financing, bonding, and insurance for socially and economically disadvantaged businesses;
- Factors related to DBE certification currently and over FFYs 2027 and 2028;
- The establishment of a Federal SBE Program; and
- Evidence of disparities from studies conducted by other organizations in the region.⁶

i. Current capacity of DBEs to perform agency work

USDOT's "Tips for Goal-Setting" suggests that agencies should examine data on past DBE participation in their USDOT-funded projects in recent years as a proxy for the current capacity of DBEs to perform such work. With the issuance of IFR 2025, USDOT requires agencies to re-evaluate businesses currently certified as DBEs to ensure that their owners meet the criteria for experiencing social disadvantage with no regard to their owners' races or genders. Caltrans began the re-certification process following the issuance of IFR 2025 and completed the process in July 2026. As the agency has not yet restarted its DBE Program, it does not have any data on the past participation of DBEs following the updated certification criteria in its contracts and procurements. Information on past participation before the release of IFR 2025 would not represent a true comparison with which to adjust the base figure due to differences in certification eligibility.

ii. Information related to employment, self-employment, education, training, and unions

Information from the Disparity Study indicated that business owners may face barriers related to human capital, financial capital, and business ownership in the California contracting industry. For example,

The owner of a goods and services company stated, "Financial education would've been amazing Having to figure it out as you go along is a struggle. ... We just don't have the education financially available to us You have to really go look for it."

The owner of a construction company stated, "It would have been helpful to have more of a business education. How to keep your paperwork going and payroll and a lot of that stuff. I was just a worker [before starting my business]."

iii. Information related to access to financing, bonding, and insurance

⁶49 CFR Section 26.45.

Quantitative and qualitative evidence collected as part of the Disparity Study indicated that socially and economically disadvantaged businesses may experience barriers to obtaining financing, bonding, and insurance in the relevant geographic market area. For example,

The owner of a Small Business (SB)- and Disabled-Veteran Business Enterprise (DVBE)-certified goods and services company stated, "It was hard for me to get lines of credit, or any type of loan. I applied for different areas and I just couldn't get anything."

The owner of an SB- and DVBE-certified goods and services company stated, "If you're just starting out and you want to work with the state, it is going to require an uphill [battle] because for one, you do have to buy insurance. So you have to have money to cover the premiums for the workers' comp[ensation], for the general liability. The state requires at least [a] minimum [of] \$1 million to \$2 million aggregate. You're going to need [an] auto policy for your vehicle. And then depending on the contract, you might need additional insurance. So that's all out-of-pocket costs."

iv. DBE certification

USDOT restructured DBE certification requirements considerably with the issuance of IFR 2025, removing the presumption of disadvantage for businesses owned by POCs and women and requiring certifying agencies to assess personal narratives that certification applicants submit to demonstrate their social disadvantage without regard to the business owners' race or gender. Caltrans and the other agencies that belong to the CUCP began re-certifying DBEs following this guidance. Caltrans has completed its re-evaluation, but other organizations in the CUCP continue to recertify DBEs, and not all members of the CUCP are accepting personal narratives from the broader population of California business owners yet. By the end of FFY 2027, Caltrans intends to grow its DBE certification directory through direct outreach to eligible businesses across the state and in collaboration with CUCP members. The agency projects that over FFYs 2027 and 2028, its DBE directory will increase almost threefold (approximately 286%), and it estimates that the characteristics (e.g., lines of work, location, capacity) of newly certified DBEs will be similar to the characteristics of the DBEs that are currently certified. Caltrans may consider certification information to support an upward adjustment to the base figure based on the proportion of DBEs that re-certify and the volume of uncertified businesses that Caltrans anticipates will pursue certification once it begins accepting new certification applications.

v. Establishment of Caltrans' Federal Small Business Enterprise (SBE) program

As an element of the Federal DBE Program, USDOT requires federal fund recipients to implement measures specifically designed to increase small business participation in their contracts and procurements. Caltrans is currently

developing a Federal SBE Program, which it intends to launch in 2027, to enhance its commitment to supporting small businesses that perform transportation-related work in the state. The Federal SBE Program will include additional program measures tailored to SBEs and designed to cultivate business growth and provide support for businesses at all stages of development, which can help businesses more successfully compete for and perform work on Caltrans projects. Thus, these measures can increase the availability of small businesses for agency work, many of which would also be eligible for DBE certification and could, in turn, potentially increase the availability of disadvantaged businesses for agency work.

vi. Evidence from disparity studies conducted within the jurisdiction

USDOT suggests that federal fund recipients also examine evidence from disparity studies conducted within their jurisdictions when determining whether to adjust their base figures. However, Caltrans has not identified any published disparity studies conducted by other organizations in the region that assess the availability of socially and economically disadvantaged businesses as defined after IFR 2025. In addition, the Disparity Study was closely tailored to the types of FTA-funded work that Caltrans awards and provides the best results related to the availability of DBEs for the agency's FTA-funded projects and the barriers they face. For that reason, any information gleaned from other disparity studies conducted in the region should be used with caution.

b. Adjustment

Caltrans considered information relevant to a potential step-2 adjustment and decided to make an upward adjustment to its base figure based on:

- Information about marketplace conditions that may disproportionately impact socially and economically disadvantaged businesses;
- Information about the Federal SBE Program it plans to implement; and
- Information about the number of new DBE certifications the agency and other members of the CUCP intend to process over FFYs 2027 and 2028.

Because information relevant to a potential step-2 adjustment supports an upward adjustment, and because the agency intends to process hundreds of additional DBE certification applications over FFYs 2027 and 2028, a realistic overall DBE goal is likely higher than the agency's base figure. To quantify the impacts of these factors, the agency calculated the availability of DBEs it would expect if the DBE certification directory increased by 286 percent over FFYs 2027 and 2028, in alignment with the agency's reasonable projections of its and its CUCP partners' intentions to increase the certification directory. Because the agency projects that the characteristics of newly certified DBEs will align with the characteristics of currently certified DBEs, it projects that it will see a proportional 286 percent increase in the availability of DBEs, resulting in an availability estimate for the participation of DBEs of 0.13 percent.

Caltrans believes it is important to set a realistic goal that accounts for information relevant to making an adjustment. Thus, as shown in Figure 3, the organization chose to take a weighted average between the base figure (0.05% weighted 60.00%), which represents the current availability of DBEs for agency work, and the projected availability of DBEs after the step-2 adjustment (0.13% weighted 40.00%), which represents a reasonable estimate of the availability of DBEs in the future, to create its new overall goal of 0.08 percent. The weighting Caltrans chose reflects the agency's consideration of the current state of DBE availability while also accounting to a lesser degree for the capacity of the CUCP to process new DBE applications and re-certify DBEs during the goal period in a risk-informed way.

Figure 3. Weighting of base figure and step-2 adjustment

Table showing the weighted calculation of the overall DBE goal from the base figure and step-2 adjustment.

Calculations	Base figure	Step-2 Adjustment	Overall
DBE Availability	0.05%	0.13%	0.08%
Weight	60.00%	40.00%	

Note: Numbers rounded to the nearest one hundredth of a percent.

3. New goal

Caltrans proposes a new overall DBE goal of 0.08 percent for FFYs 2027 and 2028.

B. DBE-Neutral and DBE-Conscious Split

DBE-neutral program measures are designed to encourage the participation of all businesses—or all small businesses—in an agency's work. In contrast, DBE-conscious measures are designed to encourage the participation of DBEs specifically in an agency's work (e.g., using DBE participation goals to award individual contracts). If an agency cannot meet its goal solely through using DBE-neutral measures, then it must consider also using DBE-conscious measures. In accordance with federal regulations and USDOT guidance, Caltrans will attempt to meet the maximum feasible portion of its proposed 0.08 percent overall DBE goal using DBE-neutral measures.

Caltrans uses myriad DBE-neutral measures to encourage DBE participation in its FTA-funded contracts in FFYs 2025 and 2026 and will continue to use those measures in FFYs 2027 and 2028. Additionally, the agency will expand its DBE-neutral measures through the launch of its Federal SBE Program in 2027. Figure 4 presents those measures.

Figure 4. Caltrans DBE-neutral measures

- Plans to pilot a DBE-neutral Federal SBE Program to encourage the participation of economically disadvantaged businesses in its FTA-funded contracts and procurements.
- Publicizes information regarding Caltrans' contracting opportunities online and in print newspapers, trade journals, and other publications to increase awareness of opportunities for small businesses to participate on Caltrans' contracts.
- Facilitates Statewide Small Business Council meetings—and regional council meetings, where applicable—to enlist the participation of small businesses and business assistance organizations to identify and remove systemic barriers to small business participation.
- Makes at least one District Small Business Liaison available in each Caltrans district office to serve as a point of contact for small business-related concerns, including how to do business with Caltrans.
- Publishes “look ahead” reports online for upcoming construction and architecture and engineering contracts to assist small businesses in planning for potential opportunities.
- Makes a series of informational handouts and brochures available to assist small businesses in navigating Caltrans' contracting and procurement opportunities.
- Enforces prompt payment laws and requirements applicable to prime contractors and subcontractors, including small businesses.
- Provides easily accessible contracting information on Caltrans' public website.
- Maintains online business resource centers—such as Caltrans' “Contractor's Corner”—that consolidate contracting information and resources for the benefit of prospective bidders and proposers, including small businesses.
- Maintains flowcharts of Caltrans' advertising, bid opening, award, and approval processes on Caltrans' website to help small businesses navigate potential contracting opportunities.
- Provides training to Caltrans' contract managers and buyers regarding opportunities for maximizing the participation of small businesses in agency contracts and procurements.
- Develops and delivers training for small businesses regarding how to do business with Caltrans.
- Spreads project advertising and bid openings throughout the year to prevent overloading prime contractors and subcontractors, including small businesses.
- Maintains a general resource mailbox for small business-related concerns—smallbusinessadvocate@dot.ca.gov—that small businesses can use to ask questions, seek assistance, or request training.

- Establishes relationships with financial institutions, surety companies, and insurance companies to provide information and resources for small businesses interested in working on Caltrans' contracts.
- Continues to maintain Caltrans' Bidder's List.

In addition to these efforts, Caltrans considered the degree to which it has historically met its DBE goal through a combination of race- and gender-conscious and race- and gender-neutral measures, which it considers to be a suitable proxy for the degree to which it can expect to attain its new DBE goal using a combination of DBE-conscious and DBE-neutral measures. In the previous triennial DBE goal the agency established, Caltrans projected that it would meet 1 percent of its DBE goal using race- and gender-neutral measures and 99 percent of its goal using race- and gender-conscious measures based on an assessment of the past participation of DBEs in the agency's awards with and without the use of DBE participation goals.

Based on that information, Caltrans projects that it will meet 1 percent of its proposed DBE goal—approximately less than 0.01 percent—for FFYs 2027 and 2028 through the use of DBE-neutral measures. The agency will meet the remaining 99 percent of its overall DBE goal—approximately 0.08 percent—using DBE-conscious measures, specifically using DBE contract goals to award various FTA-funded contracts and procurements, as appropriate.

C. Public Participation

Public participation is a key component of Caltrans' process for setting its overall DBE goal. The agency will make information about the proposed goal available to the general public on its official internet website and host a series of public participation meetings via video conference. In addition, Caltrans will consult with general contractor groups, community organizations, business associations and public stakeholders that could be expected to have information concerning the availability of DBEs and non-DBEs regarding the proposed goal. During the public comment period, Caltrans will solicit and receive comments via email, US postal mail, and fax.

D. Summary

Caltrans proposes a new overall DBE goal for FFYs 2027 and 2028 of 0.08 percent. Based on information about FTA-funded work the agency anticipates awarding and results from its analyses of the Statistics of United States Businesses database, the agency determined that the base figure for its new overall DBE goal is 0.05 percent. Caltrans decided to adjust the base figure to 0.08 percent to account for its plans to expand its certification directory in the coming years, its efforts to establish a Federal SBE Program, and marketplace conditions that may disproportionately impact socially and economically disadvantaged businesses. Caltrans will attempt to meet its overall DBE goal through a

combination of DBE-neutral and DBE-conscious program measures. The agency projects it will be able to meet 1 percent of its overall DBE goal using DBE-neutral measures and the remaining 99 percent using DBE-conscious measures.