

Federal Transit Administration (FTA) Overall DBE Goal-Setting Methodology

FFY 2018-FFY 2020

(September 2017 Revision)

Submitted in fulfillment of:

Title 49 Code of Federal Regulations Part 26

This analysis is prepared exclusively for Unitrans; it is non-transferable and is not to be duplicated.



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I. INTRODUCTION

The City of Davis (City) is a recipient of federal transit funds. The University of California at Davis (University) on behalf of Unitrans, a unit of the University, is the sub-recipient of the grants which partially fund Unitrans' capital projects and operating costs. For each FTA grant, a contract exists between the University and the City, which passes the federal grant requirements on to the University. Throughout this document, "Unitrans" refers to the University acting as the sub-recipient to the City of Davis on behalf of Unitrans, a unit of the University.

Unitrans herein sets forth its Overall Disadvantaged Business Enterprise (DBE) Goal and corresponding federally prescribed goal-setting methodology for the three-year Federal Fiscal Year (FFY) goal period of 2018-2020 (October 1, 2018 through September 30, 2020), pursuant to Title 49 Code of Federal Regulations (CFR) Part 26 "Participation by Disadvantaged Business Enterprises in U.S. Department of Transportation Programs." The purpose of the DBE goal-setting process is to level the playing field so that DBEs can compete fairly for Department of Transportation-assisted contracts, however, the program must be narrowly tailored in accordance with applicable law.

II. BACKGROUND

As the recipient of federal transit funds, the City of Davis utilizes only a small portion of FTA funding for the purchase of paratransit vehicles, which is not subject to the DBE goal-setting process. The City passes the remainder of FTA funds through to Unitrans for the provision of fixed route transit service. Therefore, as a condition of receiving this assistance, Unitrans assures the City that it will comply with FTA's DBE requirements. Therefore, in accordance with Title 49 CFR Part 26 provisions, Unitrans develops and submits a Triennial Overall DBE Goal for its FTA-assisted projects.

Unitrans herein presents its Overall DBE Goal Methodology for FFY 2018-2020.

III. FTA-ASSISTED CONTRACTING PROGRAM FOR FFY 2018-2020

Table 1 represents Unitrans's FTA-assisted contracting program, which consists of projects considered in preparing this goal methodology. The projects, which include Construction, Professional Services and Materials/Supplies contracting opportunities, are anticipated to be awarded during the triennial period:

Table 1

Project Name	Total Estimated Project Cost	Estimated FTA \$ Share	Estimated FTA % Share
Bus Shelter Replacement: Replace old shelter structures and benches that have surpassed their useful lives with new equipment.	\$150,000	\$120,000	80%

Project Name	Total Estimated Project Cost	Estimated FTA \$ Share	Estimated FTA % Share
Bus Stop Amenities Evaluation: Evaluate Unitrans bus stops and create a list of passenger amenities that would be feasible to install based on location, ridership, and space constraints.	\$150,000	\$120,000	80%
Printers/Copiers Procurement: Replace old multi- function printers/copiers that have surpassed their useful lives.	\$20,000	\$16,000	80%
Electric Propulsion Charging Equipment & Installation: Complete the engineering/design and installation of electric propulsion charging equipment at the Unitrans Maintenance Facility to facilitate the introduction of electric battery buses into the fleet.	\$400,000	\$320,000	80%
CNG Compressor Replacement: Replace the existing compressed natural gas (CNG) fuel compressors at the Unitrans Maintenance Facility.	\$1,700,000	\$1,360,000	80%
Hutch/Health Sciences Bus Stop Improvement: Install a bench and shelter at the Hutchison/Health Sciences Dr. EB stop and construct 80 feet of concrete sidewalk to improve accessibility to the stop from the intersection.	\$50,000	\$40,000	80%
Bus Surveillance Camera Replacement: Purchase new video cameras and digital video recorders to replace existing equipment that has surpassed its useful life.	\$125,000	\$100,000	80%
Anderson/Sunset Bus Stop Improvement: Install a bench and shelter at the Anderson/Sunset SB stop and make other minor accessibility improvements to the stop.	\$25,000	\$20,000	80%
Auto Parts & Accessories	\$192,569	\$48,142	25%
Automotive Repair/Maintenance	\$87,112	\$21,778	25%
Computer/Electronic Equipment	\$11,100	\$2,775	25%
Facility Maintenance	\$11,021	\$2,755	25%
Office Furniture	\$60	\$15	25%
Office Supplies	\$18,255	\$4,564	25%
Cellular telephone services	\$172,380	\$43,095	25%
Color copy or collating services	\$12,668	\$3,167	25%
Construction machinery rental less than 30 days	\$273	\$68	25%
Corporate objectives or policy development	\$1,948	\$487	25%
Facility rental	\$940	\$235	25%
Financial accounting service	\$14,400	\$3,600	25%
Food and beverage equipment rental or leasing	\$191	\$48	25%
Internet related services	\$4,000	\$1,000	25%

Project Name	Total Estimated Project Cost	Estimated FTA \$ Share	Estimated FTA % Share
Laundry services	\$44,255	\$11,064	25%
Newspaper advertising	\$12,650	\$3,163	25%
Operating system software maintenance	\$3,000	\$750	25%
Software maintenance or support fees	\$5,000	\$1,250	25%
Strategic planning consultation services	\$5,500	\$1,375	25%
System management software maintenance	\$15,611	\$3,903	25%
Vehicle inspection service	\$30,472	\$7,618	25%
Petroleum & Petroleum Products	\$79,407	\$19,852	25%
Pipeline Transportation of Natural Gas	\$105,765	\$26,441	25%
Professional and Management Skills Training	\$2,950	\$738	25%
Repair Equipment	\$8,122	\$2,031	25%
Repair Parts & Supplies	\$10,409	\$2,602	25%
Tires	\$47,142	\$11,786	25%
	\$3,517,200	\$2,320,300	66%

Table 2 provides a summary of the categories of work with estimated cost breakdown for each. Categories of work are groups utilizing comparable North American Industry Classification System (NAICS) codes for purposes of weighting the categories of work based on the engineer's estimates.

Table 2

NAICS DESCRIPTION	NAICS CODE	Estimated FTA \$ Share	Estimated FTA % Share
Commercial and Institutional Building Construction	236220	\$162,755	7.0%
Electrical Contractors and Other Wiring Installation Contractors	238210	\$288,000	12.4%
Petroleum Refineries	324110	\$19,852	0.9%
Air and Gas Compressor Manufacturing	333912	\$1,360,000	58.6%
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	334220	\$100,000	4.3%
Motor Vehicle Supplies and New Parts Merchant Wholesalers	423120	\$50,745	2.2%
Tire and Tube Merchant Wholesalers	423130	\$11,786	0.5%
Furniture Merchant Wholesalers	423210	\$15	0.0%
Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	423430	\$24,678	1.1%
Stationery and Office Supplies Merchant Wholesalers	424120	\$4,564	0.2%
Pipeline Transportation of Natural Gas	486210	\$26,441	1.1%

NAICS DESCRIPTION	NAICS CODE	Estimated FTA \$ Share	Estimated FTA % Share
Wireless Telecommunications Carriers (except Satellite)	517312	\$44,095	1.9%
Lessors of Nonresidential Buildings (except Miniwarehouses)	531120	\$235	0.0%
Construction, Mining, and Forestry Machinery and Equipment Rental and Leasing	532412	\$68	0.0%
Other Commercial and Industrial Machinery and Equipment Rental and Leasing	532490	\$48	0.0%
Offices of Certified Public Accountants	541211	\$3,600	0.2%
Engineering Services	541330	\$172,000	7.4%
Administrative Management and General Management Consulting Services	541611	\$1,862	0.1%
Media Representatives	541840	\$3,163	0.1%
Other Business Service Centers (including Copy Shops)	561439	\$3,167	0.1%
Professional and Management Development Training	611430	\$738	0.0%
Automotive Body, Paint, and Interior Repair and Maintenance	811121	\$21,778	0.9%
All Other Automotive Repair and Maintenance	811198	\$7,618	0.3%
Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	811310	\$2,031	0.1%
Drycleaning and Laundry Services (except Coin-Operated)	812320	\$11,064	0.5%
		\$2,320,300	100%

IV. GOAL METHODOLOGY

Step 1: Determination of a Base Figure (26.45)¹

To establish Unitrans' Base Figure of the relative availability of DBEs to all comparable firms (DBE and Non-DBE) available to bid or propose on Unitrans' FTA-assisted contracting opportunities projected to be solicited during the triennial goal period, Unitrans followed the prescribed federal methodology to determine relative availability. This was accomplished by assessing the *California Unified Certification Program (CUCP) DBE Database of Certified Firms* and the 2015 *U.S. Census Bureau County Business Patterns Database* within Unitrans' market area (defined as Sacramento, Solano, and Yolo counties) for each of the categories of work defined in Table 2. The Unitrans Bidder's List was consulted and it confirms the defined market area.

¹ 26.45 represents Title 49 CFR Part 26 regulatory goal setting methodology reference.

Unitrans' local market area consists of the geographic area where a substantial majority of contracting dollars are expended and/or where the substantial majority of contractor and subcontractor bids or quotes are located.

In accordance with the formula below, the Base Figure is derived by dividing the number of ready, willing and able DBE firms identified for each work category by the number of all firms identified for each corresponding work category (relative availability), weighting the relative availability for each work category by the corresponding work category weight from Table 2 (weighted ratio), and adding the weighted ratio figures together.

Base Figure =
$$\sum \frac{\text{(Number of Ready,Willing and Able DBEs)}}{\text{Number of All Ready,Willing and Able Firms}} \times weight \times 100$$

⇒ For the numerator: CUCP DBE Database of Certified Firms

⇒ For the denominator: 2015 U.S. Census Bureau's Business Patterns Database

A concerted effort was made to ensure that the scope of businesses included in the numerator was as close as possible to the scope included in the denominator.

The result of the Base Figure calculation is shown in Table 3 as follows:

Table 3

NAICS DESCRIPTION	NAICS CODE	Estimated FTA % Share	DBEs	ALL Firms	Weighted Ratio
Commercial and Institutional Building Construction	236220	7.0%	8	212	0.3%
Electrical Contractors and Other Wiring Installation Contractors	238210	12.4%	5	341	0.2%
Petroleum Refineries	324110	0.9%	0	1	0.0%
Air and Gas Compressor Manufacturing	333912	58.6%	0	1	0.0%
Radio and Television Broadcasting and Wireless Communications Equipment Manufacturing	334220	4.3%	0	1	0.0%
Motor Vehicle Supplies and New Parts Merchant Wholesalers	423120	2.2%	0	66	0.0%
Tire and Tube Merchant Wholesalers	423130	0.5%	0	19	0.0%
Furniture Merchant Wholesalers	423210	0.0%	0	35	0.0%
Computer and Computer Peripheral Equipment and Software Merchant Wholesalers	423430	1.1%	0	28	0.0%
Stationery and Office Supplies Merchant Wholesalers	424120	0.2%	0	20	0.0%
Pipeline Transportation of Natural Gas	486210	1.1%	0	4	0.0%

NAICS DESCRIPTION	NAICS CODE	Estimated FTA % Share	DBEs	ALL Firms	Weighted Ratio
Wireless Telecommunications Carriers (except Satellite)	517312	1.9%	0	0	0.0%
Lessors of Nonresidential Buildings (except Miniwarehouses)	531120	0.0%	1	153	0.0%
Construction, Mining, and Forestry Machinery and Equipment Rental and Leasing	532412	0.0%	0	34	0.0%
Other Commercial and Industrial Machinery and Equipment Rental and Leasing	532490	0.0%	1	45	0.0%
Offices of Certified Public Accountants	541211	0.2%	1	274	0.0%
Engineering Services	541330	7.4%	25	374	0.5%
Administrative Management and General Management Consulting Services	541611	0.1%	35	332	0.0%
Media Representatives	541840	0.1%	4	5	0.1%
Other Business Service Centers (including Copy Shops)	561439	0.1%	0	35	0.0%
Professional and Management Development Training	611430	0.0%	5	39	0.0%
Automotive Body, Paint, and Interior Repair and Maintenance	811121	0.9%	0	214	0.0%
All Other Automotive Repair and Maintenance	811198	0.3%	0	75	0.0%
Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance	811310	0.1%	0	96	0.0%
Drycleaning and Laundry Services (except Coin-Operated)	812320	0.5%	0	122	0.0%
Base Figure (i.e., Sum of Weighted Ratios for all Work Categories)					1.1%

Step 2: Adjusting the Base Figure

Upon establishing the Base Figure, Unitrans reviewed and assessed other known evidence potentially impacting the relative availability of DBEs within the market area, in accordance with prescribed narrow tailoring provisions set forth under 49 CFR Part 26.45: Step 2; DBE Goal Adjustment guidelines.

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



A. Past DBE Goal Attainments

As historical DBE participation attainments provide demonstrable evidence of DBE availability and capacity to perform, Unitrans proceeded to calculate past DBE participation attainments for the three (3) federal fiscal years, for which DBE attainment data is available.

The types of work Unitrans expects to award in the upcoming triennial period are similar to the work awarded in the prior triennial period. The one significant additional project this triennial period is the replacement of existing compressed natural gas fuel compressors.

Table 2 provides a summary of the categories of work with estimated cost breakdown for each. Categories of work are groups utilizing comparable North American Industry Classification System (NAICS) codes for purposes of weighting the categories of work based on the engineer's estimates.

The table below reflects the demonstrated capacity of DBEs (measured by actual historical DBE participation attainments) on FTA-assisted contracts awarded by Unitrans within the last three (3) federal fiscal years.

Table 4

FEDERAL FISCAL YEAR	FTA DBE PARTICIPATION %
2014/2015	0.7%
2015/2016	0.4%
2016/2017	0.9%
Median DBE Participation Within the Last Three (3) Years	0.7%

The median DBE attainment for the past three years is lower than the Base Figure derived from Step 1; therefore, an adjustment to the Base Figure based on Unitrans' past DBE goal attainments has been made. The adjustment is calculated by averaging the Base Figure with the Median DBE Attainment, as shown below.

Adjusted Base Figure =
$$\frac{\text{Base Figure (1.1\%) + Median DBE Attainment (.7\%)}}{2}$$

The formula resulted in a proposed adjustment (downward) to the Base Figure from 1.1% to 1^2 %.

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² Rounded to a whole number.



B. Disparity Study

Unitrans is not aware of any current disparity studies within their jurisdiction and/or market area that are demonstrably similar in size and nature to consider in this step of the goal setting analysis. Unitrans uses a strictly race-neutral DBE program, but will continue to seek out disparity studies of a similar size and nature to consider for subsequent triennial goals.

C. Other Available Evidence

Unitrans is not in possession of other information that would have an impact on the DBE goal assessment.

V. PROPOSED OVERALL DBE GOAL

The Final Proposed Overall DBE Goal for FFY 2016-2018 for Unitrans' FTA-assisted contracts is 1%. As a part of the prescribed goal-setting methodology, Unitrans must project the percentage of its Proposed Overall DBE Goal that can be met utilizing race-neutral and race-conscious measures.

Race-Conscious & Race-Neutral Projection

Unitrans intends to use to use race-neutral methods to meet the overall DBE goal of 1% for FFY 2018-2020 in accordance with Title 49 CFR Part 26.51.

RACE-CONSCIOUS & RACE-NEUTRAL PROJECTIONS	
DBE Adjusted Base Figure	1%
Race-Conscious Component	0%
Race-Neutral Component	1%

VI. RACE-NEUTRAL IMPLEMENTATION MEASURES

Unitrans is currently implementing a number of race- and gender-neutral remedies to outreach and promote the participation of DBEs and small businesses in Unitrans' FTA-assisted contracting program. Unitrans plans to continue or implement the following race-neutral measures for FFY 2015-2017 and will continue to explore other options for consideration based on Unitrans' success in meeting its overall DBE goals based on these efforts. Unitrans will:

- Arrange solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate DBE and other small business participation.
- Provide assistance in overcoming limitations such as inability to obtain bonding or financing (e.g., by such means as simplifying the bonding process, reducing bonding requirements,

eliminating the impact of surety costs from bids, and providing services to help DBEs, and other small businesses, obtain bonding and financing).

- Provide technical assistance and other services.
- Carry out information and communication programs on contracting procedures and specific
 contract opportunities (e.g., ensuring the inclusion of DBEs and other small businesses on
 recipient mailing lists of bidders; ensuring the dissemination to bidders on prime contracts
 of lists of potential subcontractors; provision of information in languages other than English,
 where appropriate).
- Provide services to help DBEs and other small businesses, improve long-term development, increase opportunities to participate in a variety of types of work, handle increasingly significant projects, and achieve eventual self-sufficiency;
- Ensure distribution of Caltrans DBE directory through electronic means to the widest feasible universe of potential prime contractors; contractors; and
- Assist DBEs and other small businesses to develop their capability to utilize emerging technology and conduct business through electronic media.

Fostering Small Business Participation³

Unitrans has incorporated the following non-discriminatory element to its DBE program, in order to facilitate competition on DOT-assisted public works projects by small business concerns (both DBEs and non-DBE small businesses): removal of bundling of contract requirements; working with the UC Davis Contracting Services Strategic Sourcing and Small Business Program, as well as the UCD Office of Campus Community Engagement to develop strategies for structuring procurements to facilitate bids by and awards to small business consortia or joint ventures; and letting prime contracts of a size that small businesses can reasonably compete for and perform. The majority of Unitrans FTA-assisted contracts are in this category.

VII. PUBLIC PARTICIPATION AND FACILITATION

Unitrans issued a Public Notice on Unitrans' website (Attachment 1), publishing the Draft Proposed FTA Overall DBE Goal-Setting Methodology for FFY 2018-2020. The notice informed the public that the proposed goal and rationale were available for inspection at Unitrans' principal office during normal business hours for 30 days following the date of the Public Notice, and that Unitrans would accept comments on the goal analysis for 30 days from the date of the Public Notice.

In accordance with Public Participation Regulatory Requirements of Title 49 CFR Part 26, minority, women, local business associations, and community organizations within the market

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³ See Title 49 CFR Part 26 Section 26.39 "Fostering Small Business Participation."



area were contacted and provided an opportunity to review the triennial goal analysis and provide input.

Unitrans reached out to a total of nine (9) local minority, women, and community business organizations to provide them information on the Unitrans DBE program and specifically the Draft Proposed FTA Overall DBE Goal-Setting Methodology for FFY 2018-2020. Each organization was contacted multiple times by both telephone and email, however none of the organizations responded. The summary of all contact made in an attempt to receive input as a part of this process can be found in Attachment 2.



Attachment 1: Website notification

News

Draft Disadvantaged Business Enterprise (DBE) Program & Goal Setting Methodology

View/Download: Draft Unitrans DBE Program and Goal-Setting Methodology

Unitrans has established a Proposed Overall Disadvantaged Business Enterprise (DBE) Goal of 1.0%, for Federal Fiscal Years 2018-2020. The DBE Goal is applicable to DOT-(FTA) assisted contracting opportunities scheduled to be awarded during the period of October 1, 2017 through September 30, 2020. Unitrans' Proposed Overall DBE Goal and its rationale (developed in response to U.S. Department of Transportation's Disadvantaged Business Enterprise Program Regulations published under Title 49 CFR Part 26) are posted the Unitrans web site at www.unitrans.com, and is available for inspection for thirty (30) days following the date of this Notice, from 8:30 a.m. to 4:00 p.m., Pacific Daylight Time, Monday through Friday at the Unitrans Business Office located at:

Unitrans

5 South Hall

1 Shields Ave

Davis, CA 95616-8759

ATTN: Teri Sheets, Assistant General Manager

Unitrans seeks input from minority, women, and general contractor groups, community organizations, other interested agencies and organizations, and the general public on the availability of both disadvantaged and non-disadvantaged businesses, the effects of discrimination on contracting opportunities for DBE firms, and efforts that could level the playing field for the participation of DBE firms in business and contracting opportunities offered by Unitrans.

Comments will be accepted for thirty (30) days from the date of this Notice. Comments can be forwarded to Ms. Teri Sheets at Unitrans at the above stated address or by email to agma@unitrans.com. Comments may also be sent to Ms. Lynette Little, Civil Rights Officer, U.S. Department of Transportation, Federal Transit Administration, 90 Seventh Street, Suite 15-300, San Francisco, CA, 94103.

Posted on July 1, 2017 at 1:36 pm Categories: Featured, Service Annoucements



Attachment 2: Consultative Process Summary

Organization Contact Information	Status	Comments
Solano County Black Chamber of Commerce 55 Springstowne Road #269, Vallejo, CA 94591 (707) 315-3515 elease@solanoblackchamber.org	 7/17/17 Email sent. 7/18/17 Called and left voicemail. 7/25/17 2nd email sent. 7/26/17 Called and left voicemail. 7/27/17 3rd email sent with goal methodology. 7/28/17 Called and left voicemail. Set up 1pm call. Discussed the DBE program in general with Elease and answered questions on the overall DBE program. Elease is unable to provide comments until 8/1/2017. Per 	None
Solano Hispanic Chamber of Commerce P.O. Box 2118, Fairfield, CA 94533 707-373-6322 president@solhcc.com	 comments will be taken at that time. 7/17/17 Email sent. 7/18/17 Called and left voicemail. 7/25/17 2nd email sent. 7/26/17 Called and left voicemail. 7/27/17 3rd email sent with goal methodology. 7/28/17 Called and left voicemail. 	None
Filipino-American Chamber of Commerce of Solano County 239 Cassady St., Vallejo, CA 94590 707-556-5800 contact@faccsolano.com 707-246-9934 (*new)	 7/17/17 Email sent & received bounce-back from email. 7/18/17 Called and left voicemail. 7/25/17 2nd email sent. 7/26/17 Called and left voicemail. 7/28/17 Called and left voicemail. 	None

Organization Contact Information	Status	Comments
Sacramento Black Chamber of Commerce	• 7/17/17 Email sent.	None
	• 7/18/17 Called and left voicemail.	
5770 Freeport Blvd, Suite 44,	• 7/25/17 2nd email sent.	
Sacramento, CA 95822	• 7/26/17 Called and left voicemail.	
(916) 231-0416	• 7/27/17 3rd email sent with goal methodology.	
info@sacblackchamber.org	• 7/28/17 Called and spoke with secretary. She has forwarded the message	
	to her boss and will let us know if she has any feedback.	
Sacramento Hispanic Chamber of	• 7/17/17 Submitted email through their website.	None
Commerce	• 7/18/17 Called and left voicemail.	
1451 River Park Drive, Suite 220,	• 7/25/17 Submitted 2nd email through their website.	
Sacramento, CA 95815 (916) 486 – 7700	• 7/26/17 Called and left voicemail.	
	• 7/27/17 Submitted 3 rd email through their website.	
	• 7/28/17 Called and left voicemail.	
Sacramento Asian-Pacific	• 7/17/17 Submitted email through their website.	None
Chamber of Commerce	• 7/18/17 Called and said they do not do work with Unitrans.	
2331 Alhambra Blvd. Suite 100	• 7/25/17 Submitted 2nd email through their website.	
Sacramento, 95817 (916) 446-7883	• 7/26/17 Called and left voicemail.	
	• 7/27/17 Submitted 3rd email through their website.	
	• 7/28/17 Called and spoke with secretary to relay message about FTA	
	Triennial DBE Goal of 1% and to provide any feedback or questions on	
	how that goal was developed.	
National Association of Women	• 7/17/17 Email sent.	None
Business Owners – Sacramento	• 7/18/17 Called and left voicemail.	
Valley	• 7/25/17 2nd email sent.	
P.O. Box 189222	• 7/26/17 Called and left voicemail.	
Sacramento, CA 95818	• 7/27/17 3rd email sent with goal methodology.	
(916) 538-4249	• 7/28/17 Called and left voicemail.	
info@nawbo-sac.org		

Organization Contact Information	Status	Comments
National Association of Women in Construction- Sacramento Chapter President, Cybil Bryant nawicsacramento@gmail.com	 7/17/17 Email sent. 7/25/17 2nd email sent. 7/27/17 3rd email sent with goal methodology. 	None
Associated General Contractors – West Sacramento 3095 Beacon Blvd, West Sacramento, CA 95691 916-371-2422 samiecr@agc-ca.org crandall@agc-ca.org	 7/18/7 Called and provided email address to send 2018 Goal Methodology document. Received bounce-back from email sent. 7/26/17 Called and spoke with Lindsay who provided email address for send goal methodology document. Received bounce-back from email sent. 7/28/17 Called and was directed to Director John Cooper's voicemail. 	None