

NCI growth

2025 UNC Capstone Final Portfolio
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Executive Summary

This brief examines state-level spending goals, targets, and strategies for Historically Underutilized Businesses (HUBs) with a focus on identifying regions and programs that have successfully met or exceeded their goals. We analyze state spending reports, legislative changes, and program characteristics to uncover patterns of success and understand factors contributing to positive economic growth. By examining geographical insights and visualizing data through a heat map, we provide a comprehensive understanding of how state agencies perform relative to their HUB spending objectives.

We include a set of actionable recommendations derived from our findings, focusing on best practices and strategies that have worked in high-performing states. These recommendations include employing race-conscious methodologies & promoting equal pay, which acknowledges historical disparities and creates targeted solutions for minority-owned businesses; increasing certification transparency and contract accountability to reduce administrative burdens while ensuring public funds achieve intended economic impact goals; implementing decentralized contracting and goal setting that creates ownership of diversity initiatives at all levels of government; offering educational webinars that help HUBs navigate complex procurement systems while educating officers about available diverse suppliers; and organizing networking conferences that create direct connections between HUBs and procurement officers, converting relationship-building into actual contract opportunities.

We aim to inform policy decisions and offer evidence-based recommendations to improve HUBs' economic participation, ultimately contributing to more equitable opportunities for historically disadvantaged businesses.

Introduction

Historically Underutilized Businesses (HUBs), comprised of minority-owned, women-owned, and disadvantaged enterprises, represent a critical yet often underserved segment of the American economy. While federal and state governments have established minimum spending goals to promote equitable contracting opportunities, significant disparities exist in how effectively states achieve these targets. This capstone project investigates the factors that enable some states to successfully meet or exceed their HUB spending goals while others consistently fall short.

Our research addresses three central questions: What characteristics distinguish high-performing states in HUB procurement? What specific strategies and legislative frameworks contribute to successful outcomes? How can these best practices be adapted to improve performance in states currently struggling to meet their goals?

Through comprehensive data collection and analysis of all 50 states' HUB programs, we created an interactive heat map visualization that reveals stark geographic patterns in goal attainment. Our methodology included analyzing state spending reports, examining legislative documents, conducting targeted interviews with state officials, and identifying common success factors across five high-performing states: Alaska, Utah, Florida, Oklahoma, and New York.

The significance of this research extends beyond simple compliance metrics. By identifying and sharing proven strategies for HUB success, we aim to support North Carolina Growth's mission of fostering an inclusive economy where all businesses can thrive. This project provides actionable insights for policymakers, procurement officers, and advocates working to expand opportunities for historically disadvantaged businesses.

Methodology

Our team employed a mixed-methods research approach to assess how effectively U.S. states and public agencies meet their spending goals for Historically Underutilized Businesses (HUBs). All data sources are documented in the “Sources” tab of the *State Spending* spreadsheet.

Data Collection

We collected publicly available data on HUB-related spending goals from official government websites, legislative and procurement reports, and public financial databases. In several cases, exact spending figures or goals were either not published or not easily accessible, and these limitations are noted in the subsequent section.

To account for variations across states, each state’s specific definition of a HUB was documented. This helped explain discrepancies in HUB criteria and potential differences in reported spending figures. Key variables compiled in our dataset include:

- State-level HUB spending goals (as a percentage of total spending)
- Actual dollars spent on HUBs (when available)
- Goal types (e.g., dollar-based spending or contract participation rates)
- The percentage difference between actual and target spending
- Goal attainment rates (calculated as: HUB Utilization / HUB Goal)

Data Visualization

To facilitate cross-state comparisons, we created a comprehensive spreadsheet that served as the foundation for our visual analysis. A heatmap (located on the second tab) illustrates each state’s HUB goal performance. States with higher attainment percentages are shown in darker shades of blue, making it easy to distinguish those exceeding, meeting, or falling short of their targets.

In addition to the heatmap, a bar chart was created for states that reported actual HUB spending in dollars. This visualization allows for a side-by-side comparison of spending levels, offering insight into overall investment, even among states not meeting their set goals.

Calculations & Internal Validity

We manually calculated goal attainment using available data for states that did not report HUB goal performance directly. In most cases, calculations involved 2–3 agencies and were

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conducted via Google Sheets using a standardized formula sheet to ensure internal consistency and reliability.

In the case of Department of Transportation DBE goals being divided between FTA, FAA, and/or FHWA:

- Look up goal setting methodology reports for each administration
- Locate "Past DBE Participation" and choose a year covered by all reports
- Using goal, goal achievement, and spending values, utilize the following formulas to calculate a weighted average for overall goal, achievement and total spending.

Example (Colorado 2021):

FHWA:

Total FHWA spending = \$457,623,760
Total FHWA DBE spending = \$54,190,441
Total FHWA DBE goal = 11.89%
Total DBE participation = 11.84%

FTA:

Total FTA spending = \$424,399
Total FTA DBE spending = \$80,330
Total FTA DBE goal = 2.50%
Total DBE participation = 18.93%

Weighted average formulas:

For FHWA proportion:

$$\frac{(\text{Total FHWA spending})}{(\text{Total FHWA spending}) + (\text{Total FTA Spending})} = \frac{(457623760)}{(457623760) + (424399)} = 0.99907$$

For FTA proportion:

$$\frac{(\text{Total FTA spending})}{(\text{Total FHWA spending}) + (\text{Total FTA Spending})} = \frac{(424399)}{(457623760) + (424399)} = 0.00092$$

For Overall Goal:

$$\text{FWHA Goal (FHWA Proportion)} + \text{FTA Goal (FTA Proportion)} = 11.89(0.99907) + 2.50(0.00092) = 11.88\%$$

For Overall Participation:

$$\text{FHWA Participation(FHWA Proportion)} + \text{FTA Participation (FTA Proportion)} = 11.84(0.99907) + 18.93(0.00092) = 11.84\%$$

Note: In one exception — Oklahoma — our team processed over 300 contract-level records. These were averaged and consolidated using Excel to estimate overall HUB goal attainment. Details and documentation of this process are included in the *State Spending* spreadsheet.

* FAA (Federal Aviation Administration), FTA (Federal Transit Administration), FHWA (Federal Highway Administration)

Limitations

Each state had varying levels of information available for different fiscal years. There were also many gaps in documentation, as certain documentation and reports were not accessible or published, there was a limited timeline, and a small team size restricted the depth of investigation into every potential source, and certain officials who had specific information did not answer interviews or emails.

Data Availability State by State

There was variance in the available data that was released by each state. This includes percentage spending goals, percentage spending realization, and actual spending for similar fiscal years. Each state released differing amounts of information about different fiscal years. This is due to each state's particular and unique spending plan that ranged over different periods. We are aware that having differing years will cause some unavoidable errors in exact state comparison. Some states do not release actual spending information. This exact number is either not accounted for, blends in with other state spending, or has not yet been released for the years that spending percentages were found. We believe that calling about these numbers may be obsolete and redundant, as it is unlikely that best practices will be found in states that lack transparency and clear reporting systems. This limitation impacted our ability to effectively visualize spending data geographically. We decided that a bar chart focusing only on states with available spending data would be most useful. As noted in the Heatmap, West Virginia has data missing. Although they have published a website with their DEI goals (8.5% goal), they do not publish their data regarding whether or not they achieved that goal. This has caused that gap.

Research Constraints

As a student research team working under time and staffing constraints, we acknowledge the possibility of human error. Our team may have encountered challenges in identifying niche legislative documents, interpreting complex or technical procurement data, applying advanced keyword searches, identifying relevant synonyms, and understanding certain state-specific financial reporting conventions. Despite these challenges, we took care to document our sources, assumptions, and calculation methods to maintain transparency and minimize potential inaccuracy.

Analysis of Current Policy Factors

This year has witnessed significant political transformations and alterations in policies concerning Diversity, Equity, and Inclusion initiatives. On January 20, 2025, the new administration enacted the executive order titled 'Ending Radical and Wasteful Government DEI Programs and Preferencing.' This directive abolished government DEI offices and prohibited equity-related contracts within the federal government. The following day, January 21, another executive order, 'Ending Illegal Discrimination and Restoring Merit-Based Opportunity,' was signed, which revoked Affirmative Action mandates for federal contractors. These developments have accompanied a substantial change in political discourse and have already led to heightened discrimination against contractors from minority-owned small businesses.

While it has been indicated that these modifications are unlikely to affect certification programs for small or disadvantaged businesses, they do signify a change in the overarching federal procurement strategy that could influence state and local government operations. Although it is not anticipated that these executive orders will directly impact programs aimed at supporting small businesses, the heightened stigma surrounding equity and inclusion initiatives stemming from these changes may result in the reorganization or elimination of DEI contract goals. Furthermore, this could lead to greater scrutiny regarding certification criteria, thereby imposing additional obstacles for disadvantaged businesses seeking certification and assistance.

During our investigation, we identified several states where the HUB programs are managed by their respective Divisions of Supplier Diversity, including Indiana, Massachusetts, Virginia, and Wisconsin. Rhode Island's initiative falls under its Division of Diversity, Equity, and Inclusion. Notably, many states, despite not explicitly incorporating DEI in their titles, utilize DEI terminology to articulate their objectives and mission. For instance, the first word on New York's program webpage is 'Diversity.' Given the current administration's agenda, we anticipate a continued decrease in federal grants and funding that have historically been vital for the success of these 'DEI' initiatives. Furthermore, a significant number of DBE methodologies across various states have highlighted a distinction between 'race-neutral' and 'race-conscious' goal-setting approaches, which may be forsaken as prevailing political discourse increasingly criticizes any form of 'racial preferencing.' This trend is particularly alarming, as this report will contend that our findings demonstrate that race-conscious strategies are markedly more effective in fulfilling overall DBE objectives.

Overall Findings

Spreadsheet

This comprehensive HUB data spreadsheet provides a detailed overview of state-level HUB participation and spending. It includes state identifiers, targeted businesses or HUB definitions, spending percentages, and their corresponding utilization rates. This spreadsheet was designed to provide a supportive and comparative analysis across each state.

Spreadsheet Label Descriptions:

States: Each state's findings.

Targeted Business Definition: The method or way in which each state defines disadvantaged or historically underutilized businesses.

State Agency(s) for Program(s): The programs, firms, and/or businesses that supply funding to these targeted businesses.

Year: Federal Fiscal Year (FY). Governments and companies utilize this for taxing or accounting reasons.

Total HUB Goal: The percentage goal set by state agencies towards targeted businesses.

Goal Type (spending or contractor participation): Some states define HUB participation in terms of state contracting dollars spent on HUB vendors. Others define participation in terms of the number of HUB vendors contracted by anchor institutions. Spending refers to the former, and participation refers to the latter.

Total HUB Spending Utilization: The actual percentage met from spending or participation.

Total Annual Spending (if available): The quantitative number of funds allocated to targeted businesses.

Success (%): The actual percentage met from spending or participation divided by the state's total HUB goal.

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States	Targeted Business Definition	State Agency(s) for Program(s)	Year	Total HUB Goal	Goal Type (spending or participation)	Total HUB Spending Utilization	Total Annual Spending (if available)	Success (%)
Alabama	<p>Disadvantaged business enterprise or DBE means a for-profit small business concern—that is at least 51 percent owned by one or more individuals who are both socially and economically disadvantaged or, in the case of a corporation, in which 51 percent of the stock is owned by one or more such individuals; and Whose management and daily business operations are controlled by one or more of the socially and economically disadvantaged individuals who own it.</p> <p>The eligibility requirements for certification as a Disadvantaged Business Enterprise (DBE) are detailed in Title 49, Part 26, of the Code of Federal Regulations (CFR).</p> <p>Business Status: The applicant firm must be an existing "for profit" business. It must also meet the federal definition of a small business based on its primary NAICS code, as described by the Small Business Administration (SBA), and must not exceed the Size Standards Exit Site icon in annual gross receipts.</p> <p>Social and Economic Disadvantage: A disadvantaged owner must be a U.S. citizen (or resident alien) and meet the federal definition of socially and economically disadvantaged as defined in 49 CFR 26.67 Exit Site icon. Individuals who can demonstrate social and economic disadvantage on an individual basis may also qualify.</p>	Alabama Department of Transportation	FY 2023	8.65%	Participation	7.61%		87.98%
Alaska	<p>Business Ownership: Disadvantaged owners must hold at least 51% ownership in the firm and must control the day-to-day operation and management of the business.</p> <p>Professional License: When a firm's primary line of work requires a professional license, the disadvantaged owner must hold the license.</p> <p>Personal Net Worth: The Personal Net Worth of a disadvantaged owner cannot exceed \$2,047 million.</p> <p>Ownership of Resources: A DBE firm must not rely on other individuals or businesses for its employees, equipment, or other resources.</p> <p>Other Business Involvement: DBE owners cannot engage in outside employment or other business interests that conflict with their management and control of the applicant firm.</p>	Alaska Department of Transportation & Public Facilities	FY 2021-2023	5.25%	Spending	16.03%		32.75%
Arizona	<p>A firm must be a minority or woman-owned business or owned by a majority owner who can demonstrate social and economic disadvantage.</p> <p>The disadvantaged owner must own at least 51% of the business enterprise.</p> <p>The disadvantaged owner must manage, operate, and control the managerial and daily operational functions of the firm.</p> <p>The owner's personal net worth must be below \$1,320,000.</p>	Arizona Department of Transportation	FY 2024	12.55%	Spending	7.90%		62.95%
Arkansas	<p>If your firm is at least 51%-owned by a socially and economically disadvantaged individual(s) who also controls the firm.</p> <p>The disadvantaged owner is a U.S. Citizen or lawfully admitted permanent resident of the U.S..</p> <p>The firm is a small business that meets the Small Business Administration's (SBA)'s size standard and does not exceed \$22,41 million in gross annual receipts. Is your firm organized as a for-profit business.</p>	Arkansas Department of Transportation	FY 2021	8.60%	Participation	7.72%		7.72%
California	<p>Statewide: The firm is majority-owned (>51%) by minorities, women, and/or LGBT individuals</p> <p>The firm is managed and controlled on a daily basis by minorities, women, and/or LGBT individuals</p> <p>The firm is an independent business</p>	California Department of Transportation Disadvantaged Business Enterprise (DBE) FHWA-funded contracts	FY 2020	17.60%	Participation	17.50%		99.43%
Colorado	<p>For-profit small business concern as defined by the U.S. Small Business Administration (based upon NAICS) At least 51% owned by one or more individuals who are both socially and economically disadvantaged. Minorities and women are presumed to be socially disadvantaged.</p> <p>Management and daily business operations are controlled by one or more of the socially and economically disadvantaged individuals who own it.</p> <p>The disadvantaged owner(s) must have a personal net-worth of less than \$1,320,000.</p> <p>Depending upon the nature of work performed, a firm (including its affiliates) must not have average annual gross receipts in excess of \$22,410,000 (\$52,470,000 for airport concessions in general with some exceptions). This size standard is for construction related work. Depending on the type of work the business performs, other lower size standards may apply.</p> <p>If state or local law requires the persons to have a particular license or other credential in order to own and/or control the firm, then the socially and economically disadvantaged owner(s) must possess the required license or credentials.</p>	Colorado Department of Transportation	FY 2021	11.88%	Participation	11.84%	\$458,048,159.00	99.66%
Connecticut	<p>In order to qualify, the majority owner of the business must be a member of a socially or economically 'disadvantaged' group in the United States with legal residence. In addition, the owner must have proof of expertise in the given field of work, as well as maintain a personal net worth below \$1.31 million.</p>	Connecticut Department of Transportation (need to update all amounts to	FY 2014*	10.70%	Participation	13.30%	\$315,029,145.00	124%

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Delaware	Disadvantaged Business Enterprise (DBE) means a for-profit small business concern that is at least 51 percent owned by one or more individuals who are both socially and economically disadvantaged or, in the case of a corporation, in which 51 percent of the stock is owned by one or more such individuals; and whose management and daily business operations are controlled by one or more of the socially and economically disadvantaged individuals who own it. All DBE's are small businesses by definition and thus qualify automatically to participate in the DelDOT Small Business Program. Must be an existing "for-profit" business that is currently operational; Must meet the federal definition of a small business concern;	Delaware Department of Transportation DBE Program	FY2022	13.40%	Participation	9.61%		71.72%
Florida	Must be an independent business which does not depend on its relationships with another firm or firms. If it is a subsidiary of a corporation, the business must still operate in a self-sufficient manner; The qualifying owner(s) must meet the federal definition of "socially and economically disadvantaged" individuals; The qualifying owner(s) must own a minimum of 51% of the company; and have an investment in their company; The qualifying owner(s) cannot have a net worth that exceeds \$2.047 Million The qualifying owner(s) must have day-to-day control of operations and possess an expertise in their work specialty.	Florida Department of Transportation (FHWA specific)	FY 2022	10.65%	Participation	12.66%		118.87%
Georgia	Hub communities are experiencing exceptional levels of population growth and economic development. Georgia's Chambers of Commerce continue to act as regional drivers, coalescing strategic partners and providing a table for	Georgia Department of Commerce	FY2024	23%	Participation	5.64%		24.52%
Hawaii	The current government-wide procurement goal stipulates that at least 23 percent of all federal government contracting dollars should be awarded to small businesses. In addition, targeted sub-goals are established for small business categories, including: Women-Owned Small Business, Small Disadvantaged Business, Service Disabled Veteran Owned Small Business and HUBZone.	Disadvantaged Business Enterprise program administered by HI Dept of Transportation	FY-2023	23.00%	Participation	17.26%		75.04%
Idaho	To be eligible for this program, communities must have a population of 50,000 or fewer, an average unemployment rate of at least 120% of the average unemployment rate for the U.S. or state and must be located outside of an urbanized area. With these designations, more than 33,392 businesses will have access to increased federal contracting opportunities through the HUBZone program. Additionally, 226 businesses that are already registered with the federal government via SAM.gov will be able to seek HUBZone certification, including 105 businesses owned by minorities or veterans.	Overall Disadvantaged Business Enterprise Triennial Goal for the Federal Highway Administration	FY-2023-2025	10.11%		7.19%		71.11%
Illinois	A business that is at least 51% owned, controlled, and operated by individuals who are socially or economically disadvantaged, including minorities, women, persons with disabilities, and veterans. These businesses may qualify for state programs such as the Business Enterprise Program (BEP) and the Disadvantaged Business Enterprise (DBE) Program, which aim to increase access to government contracts and procurement opportunities.	Business Enterprise Program	FY-2023	30%	Spending	5.50%		18.33%
Indiana	In Indiana, a Historically Underutilized Business (HUB) refers to businesses that are at least 51% owned, operated, and controlled by minorities, women, or veterans, who have been historically underrepresented in state contracting. The Indiana Department of Administration's Supplier Diversity Program promotes the inclusion of these businesses by setting participation goals in state contracts, including 7% for Minority Business Enterprises (MBE), 5% for Women Business Enterprises (WBE), and 3% for Veteran Business Enterprises (VBE) in construction	IN Dept of Administration Division of Supplier Diversity	FY-2024	15%	Spending	7%		46.67%
Iowa	the Disadvantaged Business Enterprise (DBE) program, overseen by the Iowa Department of Transportation (Iowa DOT), aims to ensure nondiscrimination in the award and administration of U.S. Department of Transportation-assisted contracts. The program seeks to create a level playing field for minority-owned, women-owned, and other socially and economically disadvantaged businesses to compete fairly for transportation-related projects	Iowa Department of Transportation	FY2024	5.72%	Participation	5.10%		97.70%
Kansas	In Kansas, a Minority-Owned Business (MOB) is defined as a business that is at least 51% owned, operated, and controlled by one or more individuals from recognized minority groups, such as African American, Hispanic, Asian American, or Native American. A Women-Owned Business (WOB) is a business that is at least 51% owned, operated, and controlled by one or more women. A Veteran-Owned Business (VOB) is a business that is at least 51% owned, operated, and controlled by one or more veterans who have served in the U.S. military. These definitions are used to promote diversity in business ownership and ensure that historically underrepresented groups have opportunities to participate in state and federal contracting processes.	Department of Transportation Authority	FY2023	23%	Participation	20%	\$23,800,000.00	86.96%
Kentucky	Whenever deemed by the CPO as in the best interests of the university, solicitations may include reserved points potential respondents certified as small and emerging business (R.S. 51-941), or a small entrepreneurship (R.S. 39-2006) or a veteran or service-connected disabled veteran-owned small entrepreneurship (R.S. 39-21). B. The CPO may waive the requirement of obtaining three or more quotes when purchases do not exceed \$50,000 per transaction from a small entrepreneurship certified under either the Hudson or Veteran Initiative when price is determined to be reasonable, in their sole discretion.	Kentucky Transportation Cabinet	FY2021	11.1%	Spending	11.71%	\$83,234,716.00	105.50%
Louisiana	In Louisiana, Historically Underutilized Business Zones (HUBZones) are areas designated by the federal government to stimulate economic development and employment growth. These zones are typically characterized by low income, high unemployment, or other economic indicators that have hindered development. The HUBZone program, administered by the U.S. Small Business Administration (SBA), provides federal contracting opportunities to small businesses located in these designated areas. To qualify, a business must meet specific criteria, including having its principal office located within a HUBZone and employing at least 35% of its employees from HUBZone residents.	Small and Emerging Business Development Program is race and gender neutral.	FY 2022	10%	Participation	8.40%		84.00%

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States	Targeted Business Definition	State Agency(s) for Program(s)	Year	Total HUB Goal	Goal Type (spending or participation)	Total HUB Spending Utilization	Total Annual Spending (if available)	Success (%)
Maine	Your firm is at least 51% owned by a socially and economically disadvantaged individual(s) who also controls the firm. The disadvantaged owner is a U.S. citizen or lawfully admitted permanent resident of the U.S. Your firm is a small business that meets the Small Business Administration's (SBA's) size standard and does not exceed \$30.72 million in gross annual receipts. (Average over 3 previous fiscal years) Your firm is a small ACDBE business that meets the Small Business Administration's (SBA's) size standard and does not exceed \$56.42 million in gross annual receipts (Average over 5 previous fiscal years) Your firm is organized as a for-profit business. Your firm must be able to provide a service or product to participate in DOT-assisted projects. Your personal net worth cannot exceed \$1.32 million.	Maine Department of Economic and Community Development	FY 2022	1.43%	Participation	1.01%		70.62%
Maryland	Business is independently owned and operated. Business is not a subsidiary of another business. Business is not dominant in field of operation. The wholesale operations of the business did not employ more than 50 persons in its most recently completed 3 fiscal years	Maryland Department of Commerce	FY 2023	26.04%	Participation	29.60%	\$18,700,000.00	113.67%
Massachusetts	Primary office of business must be located in HubZone area. At least 35% of business' employees must reside in HubZone area. Business must be at least 51% controlled by US citizen, Community Development Corporation, agricultural cooperative, or Indian tribe. Business must complete HubZone certification process.	Executive Office of Economic Development	FY 2023	5.40%	Participation	7%		129.63%
Michigan	Business is certified as a HubZone Small Business Concern by the United States Small Business Administration. Has a principal place of business located within a Qualified Opportunity Zone within Michigan. More than half of its employees have a principal residence located within a Qualified Opportunity Zone within Michigan, or both.	Michigan Economic Development Corporation	FY 2023	9.56%	Participation	7.50%		78.45%
Minnesota	To be certified as a Targeted Group small business, the business must be at least 51% owned by a woman, racial minority, or person with a substantial physical disability. In addition, the business must be operated and controlled on a day-to-day as well as long-term basis by the qualifying owner. In other words, ownership is not enough; operational control is also required. a) The firm must be at least 51% owned by one or more socially and economically disadvantaged individuals. b) The firm must be an independent business, and one or more of the socially and economically disadvantaged owners must control its management and daily operations. c) The owner must hold the highest office. d) Must own necessary equipment and have necessary personnel to do the work. e) Only existing for-profit "Small Business Concerns," as defined by the Small Business Act and Small Business Administration (SBA) regulations may be certified. DBE applicants are first subject to the applicable small business size standards of the SBA. Second, the average annual gross receipts for the firm (including its affiliates) over the previous three fiscal years must not exceed U.S. DOT's cap of \$22,410,000 Million.	Minnesota Department of Employment and Economic Development	FY 2022	13%	Participation	8.20%		68.33%
Mississippi	As established by the Small Business Administration, the business must have three-year average gross receipts not to exceed \$23.98 million. Socially and Economically Disadvantaged people are defined as Women, black Americans, Hispanic Americans, native Americans, Asian-Pacific Americans, subcontinent Asian-Americans, other groups designated by SBA. Others able to prove to be socially and economically disadvantaged as outlined in the regulation. Participants must demonstrate they are a member of an eligible group. Personal Net Worth of Owner is not to exceed \$1.32 million. Ownership and Control is defined as 51% majority owner must prove ownership and control of the firm. Other Rules Affecting Certification include that the company must not exhibit pattern of evading or subverting the intent of the DBE program.	Mississippi Development Authority	FY 2023	10%	Participation	8%		80.00%
Missouri	As established by the Small Business Administration, the business must have three-year average gross receipts not to exceed \$23.98 million. Socially and Economically Disadvantaged people are defined as Women, black Americans, Hispanic Americans, native Americans, Asian-Pacific Americans, subcontinent Asian-Americans, other groups designated by SBA. Others able to prove to be socially and economically disadvantaged as outlined in the regulation. Participants must demonstrate they are a member of an eligible group. Personal Net Worth of Owner is not to exceed \$1.32 million. Ownership and Control is defined as 51% majority owner must prove ownership and control of the firm. Other Rules Affecting Certification include that the company must not exhibit pattern of evading or subverting the intent of the DBE program.	Missouri Department of Economic Development	FY 2023	15%	Participation	12%		75.00%
Montana	The majority owner(s) must have been subjected to racial or ethnic prejudice or cultural bias within American society because of his or her identity as a member of groups without regard to his or her individual qualities. The social disadvantage must stem from circumstances beyond the individual's control. The following groups are rebuttably presumed to be disadvantaged: Black Americans, Hispanic Americans, Native Americans, Asian-Pacific Americans, Subcontinent Asian Americans, Women, and Any additional groups whose members are designated as socially and economically disadvantaged by the SBA, at such time as the SBA designation becomes effective. Business Size: A firm (including affiliates) must be a small business as defined by SBA standards. Find the table of size standards based on your business's work type (NAICS Code) here. Personal Net Worth: The majority owner(s) of the company must have a personal net worth under \$2,047,000 (excluding equity in applicant/certified business, primary residence, and retirement accounts). For-Profit: Firm must be organized for profit. Not-for-profit organizations are not eligible. Citizenship: Majority owner(s) must be a citizen (or lawfully admitted permanent resident) of the United States. Disadvantaged Business Enterprise or DBE - A for-profit small business concern: (a) That is at least 51 percent owned by one or more individuals who are both socially and economically disadvantaged or, in the case of a corporation, in which 51 percent of the stock is owned by one or more such individuals; and (b) Whose management and daily business operations are controlled by one or more of the socially and economically disadvantaged individuals who own it. (See 49 CFR part 26.67)	Montana Department of Commerce	FY 2020	6.50%	Participation	8.10%		124.62%
Nebraska		Nebraska Department of Transportation FHWA DBE Program	FY2022	5.81%	Participapation	4.60%		79.17%

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States	Targeted Business Definition	State Agency(s) for Program(s)	Year	Total HUB Goal	Goal Type (spending or participation)	Total HUB Spending Utilization	Total Annual Spending (if available)	Success (%)
Nevada	A Disadvantaged Business Enterprise, also known as a DBE, is a small for-profit business concern that is 51% owned by a designated group, such as a Woman, Veteran, LGBTQ, or Minority. To ensure Nevada is a premier business location for all businesses, the Nevada Legislature passed Assembly 436 in 2017. This legislation ensures that it's easy to obtain information concerning programs to provide financing for small businesses, in addition to information concerning the process by which the business may become certified as a disadvantaged business enterprise for the purposes of 49 C.F.R. § 26.5 or a program to provide financing for disadvantaged business enterprises.	Nevada Department of Transportation DBE Program, FHWA-funded contracts	FY2021	22.20%	Particiapation	8.22%	\$22,415,940.00	37%
New Hampshire	In order to qualify as a DBE/ACDBE, all companies must meet the following requirements: The owner and the business company have to have established their principal office in New Hampshire. The owner must be a member of a socially and economically disadvantaged group. This means owners who are citizens of the United States, and/or lawfully admitted permanent residents, and are: Black, Hispanic, Native Americans, Asian-Pacific Islanders, Subcontinent Asians, or women regardless of race. The business must be owned, at least 51%, by one or more individuals who are considered members of a socially and economically disadvantaged group. The disadvantaged owner(s) must control the company's management and daily operations. A disadvantaged owner(s) personal net worth cannot exceed \$2,047,000 (excluding ownership interest in the firm and the equity in his/her primary residence). For DBEs, the company must not exceed \$30.72 million in gross annual receipts and meet the Small Business Administration's Size Standard requirements	New Hampshire Department of Transportation DBE Program	FY2022	4.82%	Participation	2.55%		52.90%
New Jersey	To qualify for the 8(a) program, businesses must meet the following eligibility criteria: Be a small business Not have previously participated in the 8(a) program Be at least 51% owned and controlled by U.S. citizens who are socially and economically disadvantaged Have a personal net worth of \$850 thousand or less, adjusted gross income of \$400 thousand or less, and assets totaling \$6.5 million or less Demonstrate good character Demonstrate the potential for success such as having been in business for two years "historically underutilized business" means a legally recognized for-profit business organization, corporation, sole proprietorship, partnership or joint venture that has applied for and received a valid historically underutilized business certificate issued by the taxation and revenue department certifying that: (1) it has an average gross revenue for the preceding three calendar years that does not exceed five million dollars (\$5,000,000), as reported to the taxation and revenue department, or an average number of employees in New Mexico for the preceding three calendar years that does not exceed fifty; (2) it is a "resident business" as certified by the taxation and revenue department pursuant to Section 13-1-22 NMSA 1978; and (3) as certified by the taxation and revenue department, more than fifty percent of the business is owned by women or persons who are members of one or more of the following communities of color: African American, Latino or Hispanic, Asian, Pacific Islander, Native American or Alaska Native;	New Jersey department of Transportation DBE Program	FY2022	13.23%	Participation	12.13%		91.69%
New Mexico	Minority-Owned Business Enterprise (MBE): Under Article 15-A of the Executive Law, an MBE is a business enterprise in which at least fifty-one percent (51%) is owned, operated and controlled by citizens or permanent resident aliens who are meeting the ethnic definitions listed below: Black, Hispanic, Asian-Pacific, Asian-Indian Subcontinent, Native American or Alaskan Native At least fifty-one percent (51%) of the business is owned by one or more persons who are members of at least one of the following groups: Black, Hispanic, Asian American, American Indian, Female, Disabled, or Disadvantaged. The management and daily business operations are controlled by one or more owners of the business who are members of at least one of the groups set forth in the groups above. **Program specific to federally-aided highway construction projects.** An individual must own 51% or more of a "small business" and establish that they are socially and economically disadvantaged. A disadvantaged owner seeking certification must possess the power to direct or cause the direction of the management and policies of the firm. The owner must also have an overall understanding of managerial and technical competency and experience directly related to the type of business in which the firm is engaged. Certain groups are presumed socially disadvantaged by the U.S. Small Business Administration including women, Black Americans, Hispanic Americans, Native Americans, Asian-Pacific Americans, Subcontinent Asian-Pacific Americans.	DBE program through New Mexico Department of Transportation	FY2021-2023	12.30%	Participation	22.56%		183.41%
New York		New York Division of Minority and Women's Business Development	FY2023	30.00%	Spending	32.21%	\$2,822,296,207	107.37%
North Carolina		NC Department of Administration, Office for Historically Underutilized Businesses	FY2022	10.00%	Spending	8.59%	\$1,050,846,150	85.90%
North Dakota		DBE program through ND Department of Transportation	FY2022	4.66%	Participation	6.41%		137.55%

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States	Targeted Business Definition	State Agency(s) for Program(s)	Year	Total HUB Goal	Goal Type (spending or participation)	Total HUB Spending Utilization	Total Annual Spending (if available)	Success (%)
Ohio	(G) "Economically Disadvantaged Business" means a business (including its affiliates) is at least fifty-one per cent owned and controlled by a socially and economically disadvantaged individual(s) and the size of the business does not exceed the definition of a "small business" as defined by the United States small business administration (SBA) in 13 C.F.R 121.201 (2020) and calculated in accordance with 13 C.F.R 121.101 to 121.107 (2020); (I) To be a "small business" as defined by the SBA standards, only one main North American industry classification system (NAICS) code is used to determine the company's size standard. The main NAICS code (the code in which the majority of the company's gross receipts are generated) as identified by the Ohio department of administrative services' equal opportunity division (DAS/EOD) at the time of certification or recertification is the only NAICS code used to determine a business's size standard. (H) "Economically Disadvantaged Individual" means an individual(s) whose ability to compete in the free enterprise system has been impaired due to diminished capital and credit opportunities as compared to others in the same or similar business(es) that are not economically disadvantaged. Economic disadvantage is based on 13 C.F.R.	Department of Administrative Services, Equal Opportunity Division	FY2020	15.00%	Participation	21.50%	\$298,800,000.00	143.33%
Oklahoma	MSDC and its affiliates solicit major corporations and large companies to do more purchasing from minority-owned businesses and provide a "Minority Business Enterprise" (MBE) certification to assist in identifying eligible minority-owned businesses. To qualify for certification, the minority business owner must: * Be from one of the following racial minority/ethnic groups: African American/Black, Native American, Hispanic/Latino American, Asian-Pacific American and Asian-Indian American; * Hold 51% or more of the ownership of the business; * Have full control of its operations and management.	Oklahoma Department of Transportation and Disadvantaged Business Enterprise	FY2024	8.05%	Spending	18.76%	\$90,371,156.18	233.04%
Oregon	Minorities: Blacks, Hispanics, Native Americans, Asian-Pacific Americans and Subcontinent Asian Americans; Women; Other individuals on a case-by-case basis.	Oregon DOT FHWA	FY2021	15.40%	Participation	12.52%		81.30%
Pennsylvania	Woman-owned business, minority-owned business or veteran-owned business" - Diverse and disadvantaged businesses.	Department of General Services: Bureau of Small Business Opportunities Department of Administration: Rhode Island Minority Business Enterprise Compliance Office; Division of Diversity, Equity, and Inclusion	FY2024	11.01%	Allocation Percentage	11.20%	\$275,090,953.00	101.73%
Rhode Island	51% owned and operated by socially and economically disadvantaged individuals. This often includes minority-owned, women-owned, veteran-owned, and other disadvantaged businesses.	Overall Disadvantaged Business Enterprise SC DOT goal	FY2024	15.00%	Participation	10.40%		69.33%
South Carolina	'Historically Underutilized Business' means a small business that is a profit-making corporation, sole proprietorship, partnership, or joint venture in which more than fifty percent of the shares of stock or other equitable securities are owned by one or more persons who are members of the following groups: (i) Black American including all persons having origins of Black racial groups of Africa; (ii) Hispanic American including all persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish/Portuguese origin, regardless of race; (iii) Asian Pacific American including persons whose origins are from Japan, China, Taiwan, Korea, Vietnam, Laos, Cambodia, the Philippines, Samoa, Guam, the U.S. Territories of the Pacific, or the Northern Marianas; and Subcontinent Asian American, which includes persons whose origins are from India, Pakistan, Bangladesh, Sri Lanka, Bhutan, or Nepal; (iv) Native American including persons who are American Indians, Eskimos, Aleuts, or Native Hawaiians; and (v) Women including women of any ethnicity. (b) 'Small business' means an entity that qualifies as a small business pursuant to 13CFR121. (2) General Services shall establish and offer a program to provide surety technical assistance for the benefit of historically underutilized businesses. The division may contract with insurance companies, surety companies, agents, or brokers to implement the program."	Dakota Department of Transport	FY2018	11.68%	Spending	10.50%	\$58,991,000.00	89.90%
South Dakota	A disadvantaged business enterprise (DBE) is a for-profit small business concern that is: at least 51 percent owned by one or more individuals who are both socially and economically disadvantaged; and whose management and daily business operations are controlled by one or more of the socially and economically disadvantaged individuals who own it. The objectives of the DBE program are to: - ensure nondiscrimination in the award and administration of federal-aid contracts - create a level playing field on which DBEs can compete fairly for federal-aid contracts - ensure that the Department's DBE program is narrowly tailored - ensure that only firms that fully meet the eligibility standards are permitted to participate as DBEs - help remove barriers to participation of DBEs in federal-aid contracts - assist in the development of firms that can compete successfully in the marketplace outside the DBE program.	Tennessee Department of Transportation (TDOT)	FY2023	9.05%	Participation	4.33%	\$21,442,758.00	47.85%
Tennessee	The Governor's Office of Diversity Business Enterprise (Go-DBE) is dedicated to assisting small, minority-owned, and woman-owned businesses in competing for state procurement and contracting opportunities.		FY2021	9.61%	Spending	14.20%	\$766,000,000	147.76%

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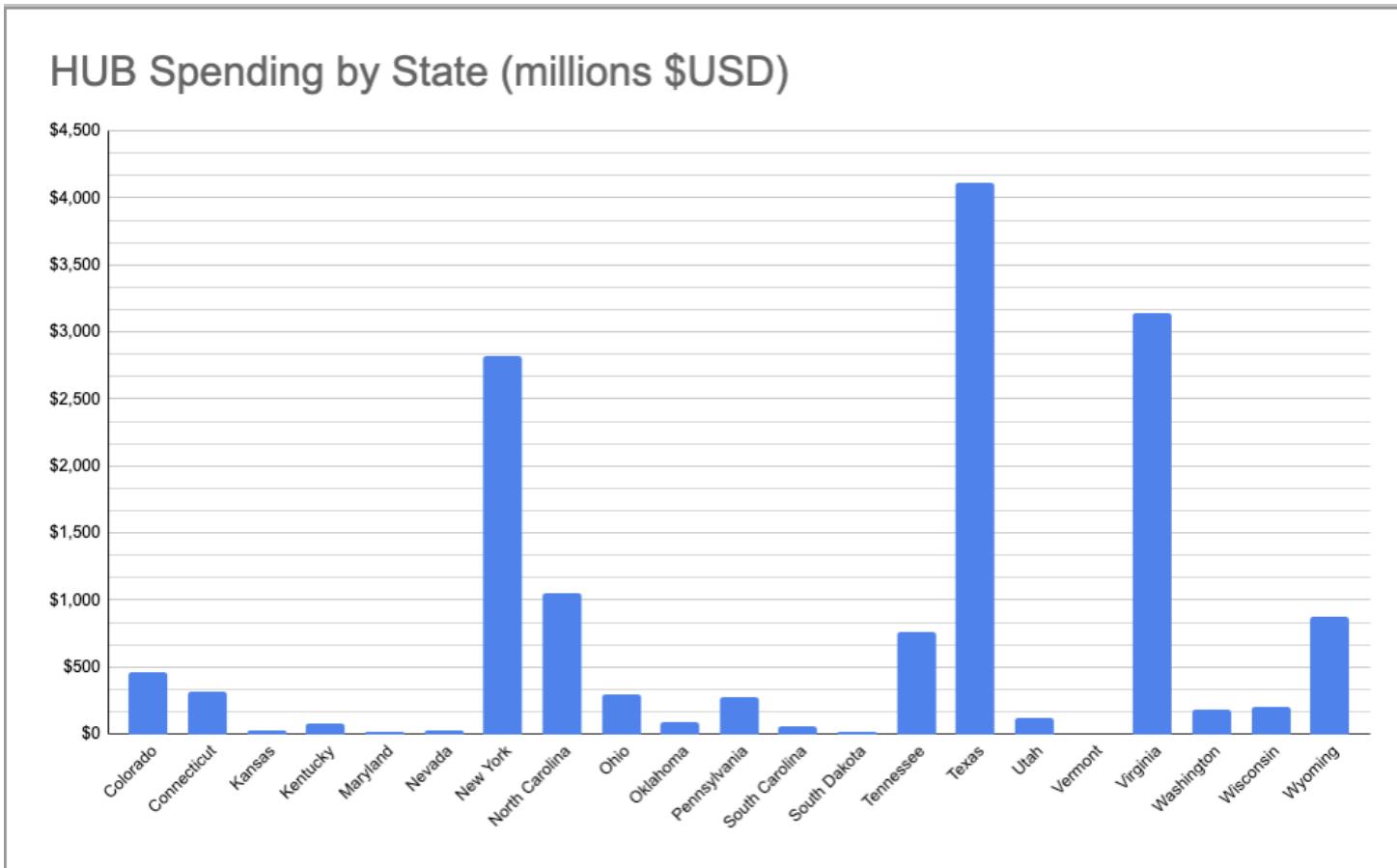
States	Targeted Business Definition	State Agency(s) for Program(s)	Year	Total HUB Goal	Goal Type (spending or participation)	Total HUB Spending Utilization	Total Annual Spending (if available)	Success (%)
Wyoming	<p>Any individual who a recipient finds to be a socially and economically disadvantaged individual on a case-by-case basis. An individual must demonstrate that he or she has held himself or herself out, as a member of a designated group if you require it.</p> <p>2. Any individual in the following groups, members of which are rebuttably presumed to be socially and economically disadvantaged:</p> <ul style="list-style-type: none"> a. "Black Americans," which includes persons having origins in any of the Black racial groups of Africa; b. "Hispanic Americans," which includes persons of Mexican, Puerto Rican, Cuban, Dominican, Central or South American, or other Spanish or Portuguese culture or origin, regardless of race; c. "Native Americans," which includes persons who are enrolled members of a federally or State recognized Indian tribe, Alaska Natives, or Native Hawaiians; d. "Asian-Pacific Americans," which includes persons whose origins are from Japan, China, Taiwan, Korea, Burma (Myanmar), Vietnam, Laos, Cambodia (Kampuchea), Thailand, Malaysia, Indonesia, the Philippines, Brunei, Samoa, Guam, the U.S. Trust Territories of the Pacific Islands (Republic of Palau), Republic of the Northern Marianas Islands, Samoa, Macao, Fiji, Tonga, Kiribati, Tuvalu, Nauru, Federated States of Micronesia, or Hong Kong; e. "Subcontinent Asian Americans," which includes persons whose origins are from India, Pakistan, Bangladesh, Bhutan, the Maldives Islands, Nepal or Sri Lanka; f. Women; <p>g. Any additional groups whose members are designated as socially and economically disadvantaged by the SBA, at such time as the SBA designation becomes effective.</p>	Wyoming Department of Transportation	FY2023	5.09%	Spending	6.30%	\$874,740,692.00	118.90%

Link to Active Spreadsheet: [State Spending \(with sources\)](#)

Annual HUB Spending by State (in millions \$USD)

Link to Interactive Chart: [Spending Chart](#)

1

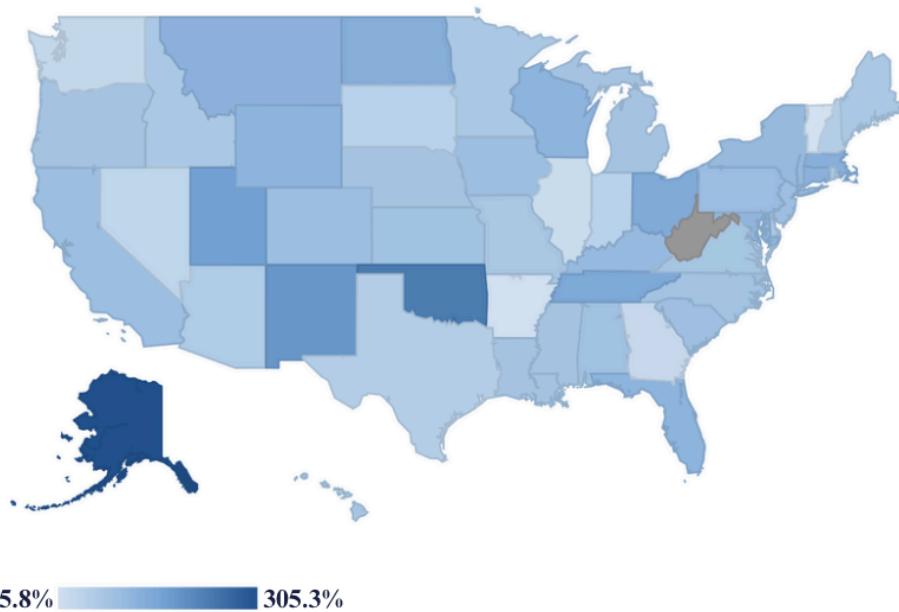


¹ This chart is reflective of the states that had such spending data available. The release of such data, through spending reports, varies from state to state.*

Geographic Insights

Heatmap

States by % HUB Goal Attainment



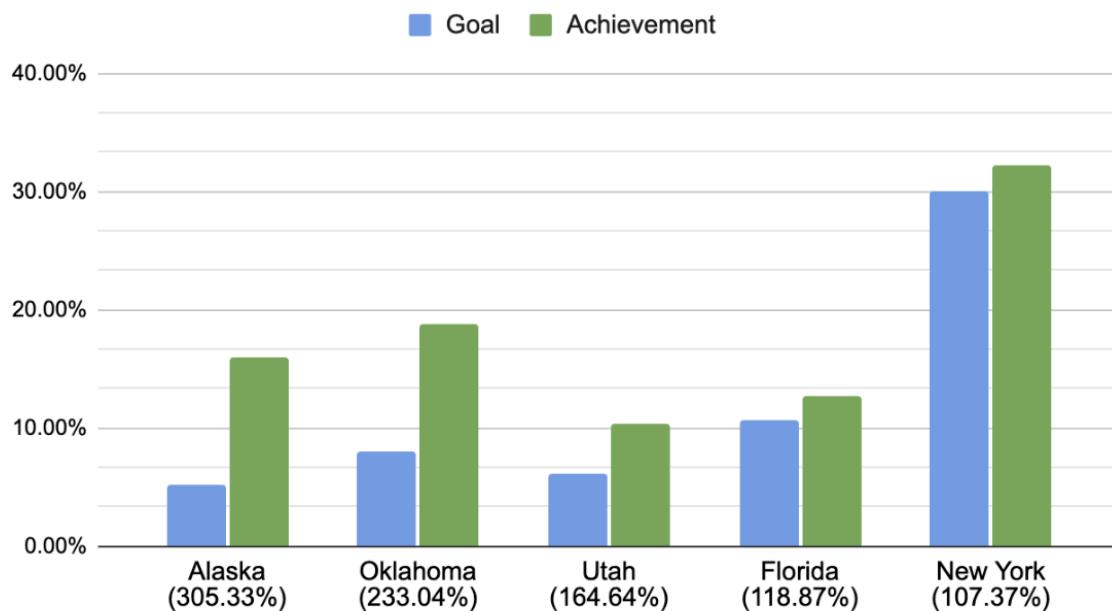
Regional Trends

To demonstrate state performance, our team has created a heat map that explains how well each state performed concerning their HUB goals, to give a better visual analysis of each state's success. The color gradient relates to their percent success rate, where lighter shades correspond to lower success rates, meaning the state did not reach its goal. Darker shades represent higher success rates, demonstrating overachievement, and the midpoint, typically a medium tone, reflects successful achievement of the state's goal.

Based on the trends observed within these states, our team conducted a closer analysis of five states. The states included in our analysis were New York, Alaska, Oklahoma, Utah, and Florida. These states met, and in some cases exceeded, their HUB goals. We selected these states in particular, given their success rates, to better understand the factors driving their success and identify patterns or best practices utilized that could be applied to advance states' success rates.

State Profiles

Case Studies: 5 Successful States



Oklahoma

Oklahoma had a DBE spending goal of 8.05% and achieved a total utilization rate of 18.76%, amounting to \$90,371,156.18 in DBE contract spending. The program is overseen by the Oklahoma Department of Transportation (ODOT), and contracts are awarded by key anchor institutions such as tribal nations, schools, public libraries, and nonprofit agencies. ODOT administers the program with the Federal Highway Administration (FHWA).

ODOT implements several strategies outlined in federal regulations to increase race-neutral participation by DBE firms. These efforts include public outreach initiatives, technical assistance programs, and legislative engagement. Services provided to DBEs include access to a dedicated webpage, business strategy guidance, and improved program accessibility. Public forums are also held to communicate DBE requirements and benefits, allowing firms to determine eligibility and improving transparency and efficiency for all stakeholders.

Improving the DBE Supportive Services Program is a key ongoing priority. ODOT emphasizes the importance of recruitment in industries with historically low DBE participation and actively promotes opportunities in subcontracting areas like bridge repair and painting. By expanding the pool of certified DBEs in underrepresented sectors, ODOT aims to boost overall availability and competitiveness. Additionally, coordination with ODOT's pre-construction branch is being strengthened to better track and promote DBE involvement in non-construction contracts. The Supportive Services Program further enhances firm viability through tailored assessments, specialized training, and assistance in business development and contract success.

In terms of spending characteristics, the majority of federal funds in Oklahoma were allocated to highway, street, and bridge construction and other large-scale infrastructure contracts.

Alaska

Alaska set a DBE goal of 5.25% and achieved a total utilization rate of 16.03%. However, numeric annual spending totals were not publicly available. Alaska Department of Transportation and Public Facilities (DOT&PF) manages the program and The Alaska Department of Environmental Conservation and the Federal Highway Administration (FHWA) awards the contracts.

Key initiatives in Alaska's DBE efforts include the annual DBE Conference, hosted virtually, which offers workshops, forums, and networking opportunities for certified firms. In addition, DOT&PF organizes at least three statewide training and networking events each year, aiming to host one in each major region when possible. These events include training on topics such as Commercially Useful Function (CUF) compliance and small business strategy development.

Alaska also maintains a centralized DBE Supportive Services (DBE/SS) webpage, which functions as a resource hub. The DBE/SS program helps DBEs build capacity and move toward self-sufficiency by offering training, access to financing resources, and business development tools. Highlights of the program include:

- A 50% DBE Reimbursement Program for financial support
- Govology webinars and other training modules
- Guidance on creating a Capability Statement
- Information on loan programs available to DBEs

DOT&PF consistently updates this resource hub to reflect new opportunities. In calculating DBE participation estimates, the state weights base figures by procurement type, ensuring that sectors receiving larger federal allocations (e.g., construction) are appropriately emphasized. MGT conducted a vendor survey that revealed 62.96% of firms identified access to credit as a major barrier in the past 12 months. Of those, 68.42% were minority- or women-owned (M/W/DBE) firms, most of whom were denied due to insufficient business history.

Alaska uses its Master Vendor Availability Database, categorized by procurement type (construction or professional services), to calculate the percentage of firms ready, willing, and able to perform on DOT&PF contracts during the study period.

Utah

In 2023, Utah set a DBE participation goal of 6.08%, representing the percentage of contracts awarded to small businesses with certified DBE status. The program is overseen by the Utah Department of Transportation (UDOT), with contract awards coordinated by agencies including the Office of Small and Disadvantaged Businesses, the Federal Highway Administration (FHWA), the Federal Aviation Administration (FAA), and the Office of the Secretary of Transportation.

UDOT adjusts its DBE goal annually using a combination of market area analysis and goal-setting methodologies recommended in the federal guide *Tips for Goal Setting*. The first step involves calculating a base figure by dividing the number of ready, willing, and able DBE firms by the total number of all firms available to compete for DOT-assisted contracts. UDOT then applies a weighting methodology based on work classification categories.

This weighting process involves two steps:

1. The ratio of DBEs to total firms within each work classification is determined.
2. The percentage of funding spent in each work classification (averaged over the past three years) is multiplied by the DBE ratio to get a weighted contribution for that category.

UDOT also reports a strong emphasis on public outreach and transparency. These efforts include internet announcements, updates on the UDOT Civil Rights webpage, advertisements in newspapers, and public forums on program adjustments. These outreach efforts aim to ensure

that all eligible firms are informed about DBE opportunities and understand how to participate effectively.

In terms of spending characteristics, the Federal Highway Administration (FHWA) remains the dominant funding source for Utah's DBE program. Although total funding decreased slightly from 2021 to 2023, the DBE percentage goal and total DBE spending continued to increase. UDOT maintains both race-conscious and race-neutral participation strategies. The race-conscious strategy actively promotes DBE inclusion by considering race and gender in contract sourcing. The race-neutral strategy does not account for race or gender but aims to ensure DBEs can compete fairly with non-DBEs. According to recent reports, nearly all of Utah's DBE participation has come from race-conscious contracting, highlighting the importance of targeted efforts to ensure equitable access to state and federally funded contracts.

With these findings, we conducted a follow-up discussion with Windy Aphayrath, Chief Procurement Officer in Utah, to further understand how Utah's best practices are implemented to drive success. In this discussion, we were able to unravel a considerable number of key insights that were essential in Utah's success, which aligned with many of the points mentioned above in our extensive research. Notable findings included: clearly defined vendor requirements, established transparency guidelines, and their commitment to fairness and compliance. The latter finding was particularly significant in their achievement, as questions may often arise regarding fairness during the vendor-related process. Emphasizing clear guidelines and transparency throughout the process has made it so that potential vendors understand the process and guidelines fully. This was crucial in preventing unnecessary obstacles that stem from unclear guidelines.

Another element that contributed to Utah's thoroughness is its built-in questionnaire for vendors. Ms. Apharyath mentioned that during the beginning stages of the process, some vendors may need additional assistance. Implementing the questionnaire has built on their commitment to transparency and fairness guidelines, ensuring all participants begin the process with a clear understanding, aligning expectations from the outset.

Together, these practices were able to contribute to the state well exceeding their goal of 6.08%. Maintaining transparency and an open line of communication has made the process much smoother, avoiding unnecessary obstacles down the line that were created from ambiguity, ensuring time and resources are utilized effectively.

New York

Despite having the lowest goal attainment percentage among the five states at 107.37%, New York achieved the highest goal of 30%, significantly surpassing the others. New York is supported by a dedicated agency, the New York Division of Minority and Women's Business Development, which ensures compliance with MWBE guidelines across all state government agencies and authorities, including various public offices. For the fiscal year 2023-24, the MWBE utilization rate in New York reached \$2.8 billion, marking the second-highest rate in the state's history and reflecting an increase of \$144 million compared to the prior year.

The state implemented several innovative program strategies, with two of the most noteworthy being the Sail Through Summer Program and the Initiative for Inclusive Entrepreneurship. The Sail Through Summer Program offers small businesses complimentary expert assistance throughout the application process via local Entrepreneurship Assistance Centers and Small Business Development Centers. Meanwhile, the Initiative for Inclusive Entrepreneurship, a collaboration between New York and the Biden Administration, aims to enhance MWBEs' access to growth capital, backed by a \$500 million federal investment to support small businesses in the aftermath of the pandemic.

Enhancing regional involvement and assistance is essential to the strategic plan of the DMWBD. In the fiscal year 2023-24, it organized a variety of regional business development initiatives, such as training sessions, webinars, and opportunities for MWBEs to connect with NYS Agencies and local contracts. Notable events included the MWBE Regional Opportunities Expo Series, which attracted over 1,000 participants and featured 30 discussion panels. Additionally, the Division conducted two monthly webinars specifically designed for MWBEs and participated in nearly 100 events to further engage with them.

A remarkable achievement was New York's reduction of MWBE certification wait times by 87%, accomplished through investments in technology and comprehensive training, including two '90-day sprints' that processed over 3,700 applications and cleared a backlog that had persisted for years.

Given these impressive achievements, we conducted a follow-up discussion with Morgan Shute, the Program Associate for Procurement Services in New York. During our discussion, Mr. Shute emphasized that their state utilizes a fair and transparent guidelines approach to avoid any confusion, which he found very effective. By clearly defining guidelines, Mr. Shute explains that

they were able to significantly reduce confusion and ensure that all parties were operating under a shared understanding. This upfront clarity was critical in fostering trust and integrity throughout the formal procurement process.

Additionally, Mr. Shute highlighted their use of discretionary purchasing, which has been a key strategy in supporting HUBs. This approach allows HUBs to receive funds without having to navigate through the long formal procurement procedures, providing a swift and efficient process for HUBs. This was particularly beneficial as funds were streamlined through this alternative method, allowing for HUBs to increase their overall participation and assisting New York in achieving its HUB spending goal.

Both tactics mentioned in the interview, that is, discretionary purchasing and transparency guidelines, were instrumental in increasing HUB participation. By establishing expectations and implementing discretionary purchasing, New York has made meaningful progress towards its HUB spending goals, emphasizing how meaningful, equity-focused practices can lead to measurable success.

Florida

Florida has an MBE program overseen by the Florida State Minority Supplier Development Council. However, specific spending goals and reporting are delegated to individual cities and municipalities. Consequently, there is no statewide MBE goal or consolidated report available from the council. The Florida Department of Transportation (FDOT) administers a specialized DBE development program, similar to the previous case studies. All offices within the FDOT agency, including aviation, public transit, and construction offices, award contracts and participate in the programs. The latest available data shows that Florida is seeing impressive success, outperforming their 10.65% goal by almost 20% in 2022.

FDOT's Equal Opportunity Compliance (EOC) system provides Computer-Based Training (CBT) for FDOT staff, prime contractors, prime consultants, and compliance specialists. The training covers system access, subcontractor and bidder list preparation, contractual agreements, and the input of DBE commitments and payments. FDOT also maintains a daily-updated DBE Directory, which lists eligible DBE firms and includes their contact information and certified work types.

A key race-neutral strategy is the Business Development Initiative (BDI), which aims to cultivate small businesses and facilitate their transition from subcontracting/sub-consulting roles to prime contracting/consulting roles. The BDI seeks to grow small businesses, increase competition, lower prices, and support contracting needs.

To address the under-concentration of DBEs in key business areas, FDOT encourages prime contractors to utilize DBEs in areas where they are underutilized and not worry about areas where there may be a perceived “overconcentration” of DBE contracts. FDOT defines underutilization as DBE and small business utilization levels of 30% or less for advertised Work Groups.

Another helpful strategy is that FDOT has set up their contracting structure to be decentralized, with the Central Office, seven districts, and the Turnpike Enterprise managing their own procurement. Florida found that this decentralized structure enabled regions to set realistic, context-specific goals and manage their contracts more effectively, contributing to higher overall DBE utilization rates.

Disparity Trends

The analysis of five state profiles reveals persistent inequalities in public education spending, despite Historically Underutilized Business (HUB) programs.

Intersectionality of Disadvantage: The data revealed that disparities are not uniform across all minority groups. While Black and Asian-owned businesses may secure contracts at rates proportional to or exceeding their population representation, they still face challenges in terms of earnings. White women-owned businesses, while classified as “historically underutilized,” often benefit the most from existing programs, pointing to the importance of considering how different forms of disadvantage (e.g. race, gender) intersect.

Systemic Barriers: The underutilization of Hispanic and Native American-owned businesses suggests that systemic barriers may be particularly acute for these groups. These barriers include:

- Lack of access to networks, capital, and financing
- Geographic isolation
- Cultural and linguistic barriers

The Earnings Gap: Black-owned businesses earn less than white-owned businesses, significantly so in states like Alaska (101.3% less). On average, minority-owned firms earn only 69% of expected contract amounts. The fact that minority-owned businesses earn less than expected, even when they do receive contracts, points to potential issues such as:

- Awarding of smaller contracts to minority-owned businesses
- Discrimination in the bidding or negotiation process
- Difficulty in accessing the same resources and support as white-owned businesses

Limitations of Existing Programs: Despite the intent of HUB programs to mitigate disparities, addressing these disparities requires a comprehensive approach beyond simply increasing contract awards to minority-owned businesses. There is a need for:

- More targeted interventions to address the specific challenges faced by different minority groups
- Greater oversight and accountability to ensure that contracts are awarded equitably
- Policies that address the root causes of economic inequality, such as disparities in access to education and capital

Recommendations

Through this analysis, we have developed recommendations that can help strengthen North Carolina's support for historically underutilized businesses. By adapting successful approaches from other states, North Carolina can create more inclusive economic opportunities and make a meaningful contribution to NC Growth's mission of building an economy where everyone can prosper.

Educational Webinars and Networking Conferences

Alaska's exceptional success rate of 305.33% demonstrates the power of direct outreach and education. Implement comprehensive training programs that provide technical assistance, networking opportunities, and workshops to strengthen HUB capacity and facilitate connections between vendors and anchor institutions. These educational initiatives should include regular webinars on contracting processes, certification requirements, and business development strategies. Additionally, hosting annual or semi-annual conferences can create valuable networking opportunities where HUBs can connect with procurement officers, prime contractors, and other business owners who can offer mentorship and partnership opportunities.

Decentralized Contracting and Goal Setting

Following Florida and Utah's successful models, empower local agencies to set realistic, context-specific goals and manage contracts more effectively. This bottom-up approach allows for greater flexibility and ownership in procurement practices while maintaining accountability. Each agency can better understand its specific industry needs, local HUB availability, and realistic achievement targets. By giving agencies the autonomy to establish and manage their own goals, they become more invested in the success of their HUB programs. This approach also allows for more targeted outreach efforts and the development of relationships with local HUB vendors who understand regional market conditions.

Employ Race-Conscious Methodologies & Promote Equal Pay

Adopt race-conscious goal-setting methods to eliminate contract disparities and encourage equitable contract award amounts across all procurement categories. This approach

analyzes historical data to identify patterns of underutilization and setting specific targets to address these disparities. Implementing regular disparity studies can help track progress and adjust strategies as needed. Furthermore, establishing guidelines for equitable contract sizes ensures that HUBs receive contracts comparable to those awarded to non-HUB businesses, preventing the common practice of relegating smaller, less profitable contracts to disadvantaged businesses.

Increase Certification Transparency and Contract Accountability

Establish precise, upfront contracting requirements and enforce transparency to promote fairness and reduce barriers to HUB participation. Clear documentation and accessible processes help level the playing field for all businesses. This includes creating user-friendly online portals where businesses can easily navigate the certification process, understand requirements, and track their application status. Regular audits and reporting mechanisms should be implemented to ensure compliance with HUB spending goals. Additionally, publishing detailed reports on HUB utilization by agency and industry sectors can help identify areas for improvement and celebrate successes, creating a culture of accountability and continuous improvement.

Conclusion

This research highlights the importance of transparency, targeted support, and innovative strategies in helping states meet or exceed their spending goals for Historically Underutilized Businesses (HUBs). While many states continue to face challenges in data availability and goal attainment, others, such as Alaska, Florida, New York, Oklahoma, and Utah, demonstrate that intentional practices, including decentralized goal setting, robust educational outreach, and race-conscious methods, can lead to significant progress.

For states like North Carolina, adopting proven strategies from high-performing regions offers a meaningful opportunity to expand economic participation among underrepresented businesses. By promoting certification transparency, strengthening local agency autonomy, and providing HUBs with technical assistance and networking opportunities, states can build more inclusive and equitable contracting ecosystems.

Ultimately, the mission to support HUBs is not just about meeting certain numbers; it is about building a system that reflects the diversity and talent of our entire economy. When states invest in equitable procurement policies, they do more than support small businesses, they create innovation, create jobs, and promote long-term community wealth. As public agencies navigate the evolving political and economic landscape, the strategies outlined in this report serve as both a benchmark and a call to action. With both data-driven policy and design, the path to a more inclusive economy is achievable.

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