

DBE GOALS

Cincinnati/Northern Kentucky
International Airport
FY 2024-2026

Attachment 1

Section 26.45: Overall Goal Calculation

**KENTON COUNTY AIRPORT BOARD
OVERALL DISADVANTAGED BUSINESS
ENTERPRISE GOAL
FISCAL YEARS 2023-2025**

INTRODUCTION

The Kenton County Airport Board (KCAB), operator of the Cincinnati/Northern Kentucky International Airport (CVG), located in Hebron, Boone County, Kentucky derived the overall Disadvantaged Business Enterprise (DBE) Program Goal in a method consistent with the requirements of 49 CFR Section 26.45.

The Chief Executive Officer (CEO) at CVG is Candace S. McGraw, (859) 767-3153; Fax (859) 767-3080.

PROCEDURES FOR SETTING ANNUAL OVERALL GOAL

KCAB staff reviewed the type, nature, and number of Federal Aviation Administration (FAA) funded projects which are planned for federal fiscal years (FY) 2023-2025. KCAB then evaluated the number of purchase contracts, the number of DBE contractors known to KCAB by reason of past bids, and the individual contracting opportunities contained within each project.

Per Section 49 CFR Part 26.45(f)(1), KCAB submits its overall goal for three-year intervals to the Federal Aviation Administration Office of Civil Rights. In establishing the goal for fiscal years 2023-2025, KCAB staff reviewed prior KCAB projects and prior DBE participation in KCAB projects. KCAB staff reviewed county census patterns for the NAICS codes which are expected to compete for projects planned for FY 2023 – 2025. KCAB staff also reviewed DBE goals of other recipients within the region and hosted a stakeholder consultation meeting with DBE firms and organizations which may have information relevant to DBEs. KCAB staff performed these evaluations in order to obtain information concerning the availability of disadvantaged businesses to participate in KCAB projects, the effects of past discrimination on opportunities for DBEs to participate in KCAB projects, and to evaluate KCAB’s efforts to establish a level playing field for DBE participation in KCAB projects.

As in previous years, KCAB will publish the overall goal, and any updates, for FY 2023-2025 on KCAB’s website at <https://www.cvgairport.com/business/business-opportunities/business-diversity/>.

CONTRACT GOAL

The following federally funded contracts are expected to be let during the federal fiscal years 2023, 2024, and 2025.

Federal Fiscal Year	Project Description	Estimated Federal Participation (\$)
FY-2023	Construct Taxiway D2 (Phase 1, Design Only), Construct Taxiway D6 (Phase 1, Design Only), Construct Taxiway D8 (Phase 1, Design Only), Construct Taxiway E9 (Phase 1, Design Only), Construct/Extend/Improve Safety Area 18L/36R (Phase 1 – Design Only, Install Taxiway Lighting D2 (Phase 1, Design Only), Install Taxiway Lighting D6 (Phase 1, Design Only), Install Taxiway Lighting D8 (Phase 1 Design Only), Install Taxiway Lighting E9 (Phase 1 Design Only), Rehabilitate Runway 18C/36C (Phase 1, Design Only) ,Rehabilitate Runway Lighting 18C/36C (Phase 1, Design Only)	\$3,416,056

FY-2023	Concourse B Apron Rehabilitation, Taxiway G&R Rehab	\$2,719,545
FY-2023	Replacement of Passenger Boarding Bridges at Concourse B (Phase 1 – Construction)	\$14,000,000
FY-2023	Replacement of Passenger Boarding Bridges at Concourse B (Phase 2)	\$13,517,720
FY 2024	Runway 18C-36C Rehabilitation Construction	\$10,400,000
FY 2024	Relocation of Taxiway D2 & Demo Construction	\$6,150,000
FY 2024	18L/36R RSA Grading and Tunnel Parapet Corrections (Construction)	\$1,000,000
FY 2024	Airfield Vault 12 Upgrades and Southwest Vault Regulator Replacement (Construction)	\$5,500,000
FY 2024	Concourse B Passenger Loading Bridge Replacements (9) and Chiller Replacement	\$13,600,000
FY 2025	Concourse A Apron Reconstruction (Design)	\$6,700,000
FY 2025	Concourse A Apron Reconstruction (Construction)	\$12,000,000
FY 2025	Taxiway 2 Panel Reconstruction (Construction)	\$2,000,000
FY 2025	South Airfield Tunnel (Design)	\$375,000
FY 2025	South Airfield Tunnel (Construction)	\$2,800,000
FY 2025	Replacement of Passenger Boarding Bridges at Concourse B (Phase 3)	\$8,000,000
	Total:	\$102,178,321

MARKET AREA

Pursuant to 49 Part 26.45, the overall goals are based upon the availability of ready, willing, and able DBE firms in the Normal Market Area (NMA). KCAB identified its NMA by examining its federally funded projects for fiscal years 2020-2022. The NMA consists of Boone, Kenton, and Campbell Counties in Northern Kentucky; Hamilton, Butler, Warren, Clermont, Montgomery, and Franklin Counties in Ohio; and Dearborn County, Indiana. On average during fiscal years 2020-2022 KCAB awarded 91% of its contracting dollars on federally funded projects to contractors in these 10 counties and over 55% of the total bidders were located within these 10 counties. In FY 2020 a multi-year, multi-grant project was awarded. Given the challenges in contracting during COVID, it is probably that the contracting pool was limited. All three of the bids received included similar subcontractors that were located in areas far from the NMA (New York, Pennsylvania, Illinois). Looking back an additional three years (2017-2019) confirms the appropriateness of NMA's geographic location, given those conditions.

FY2020-2022	Total Contracts Amount	Percentage of Total Contract Dollars	Total Number of Bidders (incl. subs)	Percentage of Total Bidders
Normal Market Area	\$104,502,398.24	91%	29	55%
Outside Market Area	\$9,983,696.84	9%	24	45%
Totals	\$114,486,095.08	100%	53	100%
FY2017-2019	Total Contracts Amount	Percentage of Total Contract Dollars	Total Number of Bidders (incl. subs)	Percentage of Total Bidders
Normal Market Area	\$34,629,448.53	90%	240	73%
Outside Market Area	\$3,703,341.85	10%	91	27%
Totals	\$38,332,790.38	100%	331	100%

Step 1: 49 CFR 26.45(c)

To determine the percentage of DBEs, both prime and subcontractors, that are ready, willing, and able to compete for contract work at CVG, the following steps were taken to calculate the Step 1 base goal:

1. KCAB's Planning and Development Department identified the proposed projects for fiscal years 2023-2025 likely to receive FAA funding assistance.
2. KCAB's DBELO worked with the departments assigned to the projects to identify the types of work to be completed on each project and estimated the percentage of dollars expected to be performed under each NAICS Code as compared to the total contract price.
3. The types of work identified were classified under the appropriate NAICS Code.
4. The total number of contracting firms in the identified NMA classified under each identified NAICS code was calculated using the information available on the U.S. Census Bureau's 2020 County Business Patterns report.
5. The number of DBE firms in the NMA classified under each identified NAICS code was calculated relying on the information contained in the certification lists published and maintained by the Kentucky Transportation Cabinet, the Ohio Unified Certification Program, and the Indiana Department of Transportation.
6. The list of certified DBE firms was reviewed to ensure that each firm was ready, willing and able to perform the type of work included in the FY2023-2025 identified projects. If a DBE firm was excluded, then both the number of DBE firms and the total number of firms included under that NAICS code were reduced accordingly.

7. The number of DBE firms in each NAICS code was divided by the total of all firms in that NAICS code. This quotient was then weighted by multiplying by the percentage of contract dollars estimated to be expended on the work in that NAICS code.
8. The weighted totals were then added to arrive at the base goal for each fiscal year. Fiscal year goals for FY 2023-2025 were then added and divided by three to arrive at the overall Step 1 base goal of 12.55%.

AIP Eligible Projects				DBE Firms	All Firms	Weighting: ((DBE/All firms) x %) x 100
Primary Project Description	NAICS Code	Trade/Discipline	% of Annual Total			
2023						
Concourse B Apron Rehabilitation (Construction)	237310	Highway, Street & Bridge Construction	6.8%	24	72	2.26
	238210	Electrical Construction	0.8%	10	635	0.01
	423390	Construction Material Merchant Wholesalers	0.2%	1	66	0.00
	541330	Engineering Services (CA/CI)	0.3%	32	690	0.01
Runway 18C-36C Rehabilitation (Design)	541330	Engineering Services	8.1%	32	690	0.38
	541611	Construction Scheduling and Cost Estimating	1.6%	31	813	0.06
	541360	Geotechnical Testing and Engineering	0.2%	0	3	0.00
	541370	Surveying	0.2%	11	45	0.05
Concourse B Passenger Loading Bridge Replacements	236220	Commercial and Institutional Building Construction	72.0%	21	386	3.91
	237310	Highway, Street, and Bridge Construction-stripping	0.8%	24	72	0.27
	238210	Electrical Contractors and Other Wiring Installation Contractors	4.9%	10	635	0.08
	238220	HVAC	4.1%	4	937	0.02
				FY 23 Base Goal:		7.06
2024						
Runway 18C-36C Rehabilitation (Construction)	541330	Engineering Design & CACI	4.8%	32	690	0.22
	541370	Surveying and Mapping (except Geophysical) Services	0.6%	11	45	0.14
	236220	Commercial and Institutional Building Construction	1.7%	21	386	0.09
	237310	Highway, Street, and Bridge Construction	11.9%	24	72	3.97
	237990	Other Heavy and Civil Engineering Construction	2.6%	11	16	1.76
	238110	Poured Concrete Foundation and Structure Contractors	0.3%	6	204	0.01
	238120	Structural Steel and Precast Concrete Contractors	0.3%	6	23	0.07
	238210	Electrical Contractors and Other Wiring Installation Contractors	0.9%	10	635	0.01
	238390	Concrete Sealing	0.3%	2	81	0.01
	238910	Site Preparation Contractors	3.1%	18	269	0.21

	339950	Sign Manufacturing	0.3%	2	79	0.01
	423390	Other Construction Material Merchant Wholesalers	0.3%	1	66	0.004
	484220	Specialized Freight (except Used Goods) Trucking, Local	0.3%	72	222	0.09
	488490	Other Support Activities for Road Transportation	0.3%	4	12	0.09
	561730	Landscaping Services	0.9%	8	1152	0.01
Relocation of Taxiway D2 & Demo (Construction)	541330	Engineering Design & CACI	2.9%	32	690	0.13
	541370	Surveying and Mapping (except Geophysical) Services	0.3%	11	45	0.08
	236220	Commercial and Institutional Building Construction	1.0%	21	386	0.05
	237310	Highway, Street, and Bridge Construction	8.6%	24	72	2.85
	238110	Poured Concrete Foundation and Structure Contractors	0.2%	6	204	0.005
	238120	Structural Steel and Precast Concrete Contractors	0.2%	6	23	0.04
	238210	Electrical Contractors and Other Wiring Installation Contractors	0.5%	10	635	0.01
	238390	Concrete Sealing	0.2%	2	81	0.004
	238910	Site Preparation Contractors	1.8%	18	269	0.12
	339950	Sign Manufacturing	0.2%	2	79	0.004
	423390	Other Construction Material Merchant Wholesalers	0.2%	1	66	0.003
	484220	Specialized Freight (except Used Goods) Trucking, Local	0.2%	72	222	0.05
	488490	Other Support Activities for Road Transportation	0.2%	4	12	0.06
	561730	Landscaping Services	0.5%	8	1152	0.004
18L/36R RSA Grading and Tunnel Parapet Corrections (Construction)	541330	Engineering Design & CACI	0.2%	32	690	0.01
	541370	Surveying and Mapping (except Geophysical) Services	0.02%	11	45	0.01
	237310	Highway, Street, and Bridge Construction	1.5%	24	72	0.49
	237990	Other Heavy and Civil Engineering Construction	0.8%	11	16	0.55
	238990	All Other Specialty Trade Contractors	0.04%	55	320	0.01
	423320	Brick, Stone, and Related Construction Material Merchant Wholesalers	0.01%	44	40	0.01
	423390	Other Construction Material Merchant Wholesalers	0.01%	1	66	0.00
	484220	Specialized Freight (except Used Goods) Trucking, Local	0.1%	72	222	0.03
	488490	Other Support Activities for Road Transportation	0.03%	4	12	0.01

Airfield Vault 12 Upgrades and Southwest Vault Regulator Replacement (Construction)	236220	Commercial and Institutional Building Construction	3.0%	21	386	0.16
	238190	Other Foundation, Structure, and Building Exterior Contractors	0.8%	1	28	0.03
	238210	Electrical Contractors and Other Wiring Installation Contractors	11.3%	10	635	0.18
Concourse B Passenger Loading Bridge Replacements	236220	Commercial and Institutional Building Construction	32.7%	21	386	1.78
	237310	Highway, Street, and Bridge Construction-stripping	0.4%	24	72	0.12
	238210	Electrical Contractors and Other Wiring Installation Contractors	2.2%	10	635	0.04
	238220	HVAC	1.9%	4	937	0.01
				FY 24 Base Goal:		13.55
2025						
Concourse A Apron Reconstruction (Design)	541330	Engineering Services	20.1%	32	690	0.93
	541611	Construction Scheduling and Cost Estimating	3.1%	31	813	0.12
	541360	Geotechnical Testing and Engineering	1.3%	3	6	0.65
	541370	Surveying	1.3%	11	45	0.32
Concourse A Apron Reconstruction (Construction)	541330	Engineering Design & CACI	2.6%	32	690	0.10
	541370	Surveying and Mapping (except Geophysical) Services	0.9%	11	45	0.18
	541990	All Other Professional, Scientific, and Technical Services	3.4%	14	113	0.37
	237310	Highway, Street, and Bridge Construction	30.1%	24	72	8.78
	238990	All Other Specialty Trade Contractors	3.4%	55	320	0.52
	238210	Electrical Contractors and Other Wiring Installation Contractors	1.3%	10	635	0.02
	423390	Other Construction Material Merchant Wholesalers	0.2%	1	66	0.00
	484220	Specialized Freight (except Used Goods) Trucking, Local	0.2%	72	222	0.06
	488490	Other Support Activities for Road Transportation	0.9%	4	12	0.25
Taxiway S Panel Reconstruction (Construction)	541330	Engineering Design & CACI	0.4%	32	690	0.02
	541370	Surveying and Mapping (except Geophysical) Services	0.1%	11	45	0.03
	237310	Highway, Street, and Bridge Construction	4.9%	24	72	1.62
	238990	All Other Specialty Trade Contractors	0.3%	55	320	0.05

	423390	Other Construction Material Merchant Wholesalers	0.03%	1	66	0.00
	484220	Specialized Freight (except Used Goods) Trucking, Local	0.03%	72	222	0.01
Concourse B Passenger Loading Bridge Replacements	236220	Commercial and Institutional Building Construction	22.1%	21	386	1.20
	237310	Highway, Street, and Bridge Construction-stripping	0.3%	24	72	0.08
	238210	Electrical Contractors and Other Wiring Installation Contractors	1.5%	10	635	0.02
	238220	HVAC	1.3%	4	937	0.01
Airfield Tunnell (Design)	541330	Engineering Design & CACI	1.0%	32	690	0.05
	541611	Construction Scheduling and Cost Estimating	0.1%	31	813	0.00
	541360	Geotechnical Testing and Engineering	0.1%	3	6	0.03
	541370	Surveying	0.04%	11	45	0.01
Concourse A PLBs Replacements Airfield Tunnell (Design)	541330	Engineering Design & CACI	0.7%	32	690	0.03
	541370	Surveying and Mapping (except Geophysical) Services	0.2%	11	45	0.04
	237310	Highway, Street, and Bridge Construction	1.8%	24	72	0.59
	238990	All Other Specialty Trade Contractors	1.7%	55	320	0.29
	238210	Electrical Contractors and Other Wiring Installation Contractors	3.5%	10	635	0.06
	423390	Other Construction Material Merchant Wholesalers	0.3%	1	66	0.00
	484220	Specialized Freight (except Used Goods) Trucking, Local	0.3%	72	222	0.09
	488490	Other Support Activities for Road Transportation	0.4%	4	12	0.15
					FY 25 Base Goal:	17.03

3-year (FY2023-25) Base Goal: 12.55%

$$7.06\% \text{ (FY2023)} + 13.55\% \text{ (FY2024)} + 17.03\% \text{ (FY2025)} = 37.65 / 3 \text{ years} = \mathbf{12.55\%}$$

Step 2: 49 CFR 26.45(d)

After calculating the base figure of the relative availability of DBEs, evidence was examined to determine what adjustment was needed in order to arrive at the overall goal. KCAB considered the past DBE participation level in federally assisted contracts at CVG. Accordingly, KCAB decided that a Step 2 adjustment was justified. KCAB considered the capacity of DBEs to perform work as measured by the median past participation of DBEs on AIP projects during Fiscal Years 2018-2022 because this was likely to present an accurate picture of the availability of DBE firms ready, willing, and able to participate in Board contracts during Fiscal Years 2023-2025. The following steps were taken to calculate this Step 2 adjustment:

1. The DBE participation percentages for awarded contracts in Fiscal Years 2018-2022 were arranged from low to high to arrive at the median of 7.5%.
2. Finally, the median of past participation was added to the Step 1 base goal and divided by 2 to arrive at the average. This average is the overall goal for each of the Fiscal Years 2023-2025.

Fiscal Year	Percentage of DBE participation
2018	0%
2019	0.72%
2020	10.35%
2021	8.21%
2022	10.5%

Fiscal Year Goal = (Step 1 Base Goal + Step 2 median) ÷ 2

FY2023: (7.06 + 8.21) ÷ 2 = 7.64%

FY2024: (13.55 + 8.21) ÷ 2 = 10.88%

FY2025: (17.03 + 8.21) ÷ 2 = 12.62%

Overall Goal = (FY2023 + FY2024 + FY2025) ÷ 3

FY 2023-2025 Overall Goal = 10.4%

Total Dollar Amount expected to be expended with DBEs:

\$3,499,945 (FY2023) + \$3,811,600 (FY2024) + \$3,315,000 (FY2025) = **\$10,626,545**

PUBLIC NOTICE

KCAB will publish the overall goal on its website at <https://www.cvgairport.com/business/business-opportunities/business-diversity/>.

**BREAKOUT OF ESTIMATED RACE/GENDER NEUTRAL
and RACE/GENDER CONSCIOUS PARTICIPATION**

KCAB will meet the maximum feasible portion of its overall goal by using race/gender neutral means of facilitating DBE participation. KCAB uses the following race/gender neutral means to increase DBE participation:

1. Advertise bids in minority publications and websites;
2. Advertise and post bids on CVG's website;
3. Directly notify women and minority groups, contractors, and suppliers of bid opportunities;
4. Conduct outreach programs;
5. Network with local minority groups and chambers of commerce; and,
6. Direct contractors to the certified DBE lists in Kentucky, Ohio, & Indiana.

KCAB reviewed the DBE goal accomplishments for fiscal years 2018-2022 to calculate the breakout of Race Neutral (RN) and Race Conscious (RC) participation. Over the past 5 years, the DBE goals have not been met.

	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Fiscal Year Goal	1.37%	19.45%	10.50%	10.50%	10.50%
RC Goal	0.00%	0.00%	4.30%	4.30%	4.30%
RN Goal	1.37%	19.45%	6.20%	6.20%	6.20%
Accomplishment	0.00%	0.72%	10.35%	8.21%	12.00%
RC Accomplish.	0.00%	0.00%	7.34%	8.21%	11.40%
RN Accomplish.	0.00%	0.72%	3.01%	0.00%	0.60%
Exceeded Goal	-1.37%	-18.73%	-0.15%	-2.29%	1.50%

Considering the median race/gender neutral accomplishments for fiscal years 2018-2022 KCAB estimates that, in meeting its overall goal of **10.4%**, KCAB will obtain **0.60%** from race/gender neutral participation and **9.8%** from race/gender conscious participation.

In order to ensure that KCAB's DBE program will be narrowly tailored to overcome the effects of past discrimination, KCAB will adjust the estimated breakout of race/gender neutral and race/gender conscious participation as needed to reflect actual DBE participation and KCAB will track and report race/gender neutral and race/gender conscious participation separately. For reporting purposes, race/gender neutral DBE participation includes, but is not necessarily limited to, the following:

- DBE participation through a prime contract a DBE obtains through customary competitive procurement procedures;
- DBE participation through a subcontract on a prime contract that does not carry a DBE goal;
- DBE participation on a prime contract exceeding a contract goal; and
- DBE participation through a subcontract from a prime contractor that did not consider a firm's DBE status in making the award.

PUBLIC PARTICIPATION

Consultation:

KCAB consulted with stakeholders before submitting the overall goal to the FAA. Stakeholders included but are not limited to: minority and women's business groups; community organizations; trade associations; small, minority, and women owned firms; and, other officials or organizations which could be expected to have information concerning the availability of disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the sponsors efforts to increase participation of DBEs.

KCAB hosted a DBE Goal Setting Stakeholder Consultation Meeting on July 12, 2022 at 11:00 a.m..at the CVG Centre, 77 Comair Boulevard, Erlanger, KY 41018, and a virtual meeting at 5:00 p.m.

Attachment 8, 9, 10 & 11 include copies of the Public Notice, stakeholder invitation emails, emails posted through PlaNet Bids and the presentation given at the stakeholder meeting.

Invitations were sent via email to the following stakeholders:

1. Minority Business Accelerator – Cincinnati Regional Chamber of Commerce
2. Tri-State Minority Supplier Development Council (TMSMDC)
3. Ohio Minority Business Assistance Center
4. Greater Cincinnati Northern Kentucky African American Chamber-Commerce
5. KY Transportation Cabinet Office of Civil Rights & Small Business Development
6. Southwest Ohio Regional Transit Authority (SORTA) – FTA Recipient
7. Ohio Department of Transportation
8. City of Cincinnati
9. Lexington (KY) Bluegrass Airport
10. Louisville Regional Airport Authority
11. Hispanic Chamber Cincinnati USA, OH
12. Ohio River Valley Women's Business Council
13. Urban League of Greater Cincinnati
14. Indian American Chamber of Commerce – Greater Cincinnati and Northern Kentucky
15. Northern Kentucky Chamber of Commerce Women's Initiative
16. Japan America Society of Greater Cincinnati
17. Greater Cincinnati Chinese Chamber of Commerce
18. The Associated General Contractors of America (AGC of America)
19. European American Chamber of Commerce
20. The Associated General Contractors of Western Kentucky
21. Airport Minority Advisory Council (AMAC)
22. American Subcontractors Association, Inc.
23. American Subcontractors Association of Ohio
24. Greater Cincinnati World Affairs Council
25. Construction Estimating Institute (CEI) DBE Support Services
26. Transit Authority of Northern Kentucky
27. City of Oxford Chamber of Commerce
28. 1,080 firms registered on CVG's bidding website and self-identified as disadvantaged, small, woman-owned, minority-owned, or disabled veteran business enterprises

KCAB's DBELO led the stakeholder consultation meeting and attendees included representatives from: ODOT Division of Opportunity, Diversity & Inclusion, and 9 private firms representing various trades as follows:

AM Session Attendees:

- | | |
|----------------------|------------------------|
| 1. Larisa Sims | CVG Airport Authority |
| 2. Majid Samarghandi | "Triton Services, Inc" |
| 3. Jaime Burch | Fusions Safety |
| 4. Rob Wagner | Fusions Safety |
| 5. David Kopecky | Ranger Steel |

- 6. Ajay Bansal Bansal Construction
- 7. Karla Boldery La Mega Media

PM Session Attendees:

- 1. Larisa Sims CVG Airport Authority
- 2. Lesley Holgate CVG Airport Authority
- 3. Alex Guerra Flying High Productions
- 4. Jeff McCabe Stinar
- 5. Jeff Johnson Johnson Group
- 6. James Scales ODOT

The attendees provided the following feedback on the goal during the consultation meeting.

Question/Comment
Question: Will each contract have the same DBE Goal %? Answer: No, each contract includes a calculation of contract goal dependent on the specific scope of work for that project.
Questions: Look at breaking large contracts into smaller pieces/bonding capacity for smaller companies. Answer: Yes, we do that in conjunction with our project managers based on scope of work. This is anticipated in the potential subcontracts and related to the goal calculation for each project.
Questions: Why isn't safety broken out as a NAICS code? Answer: Scopes are based on project managers expected areas of opportunity for subcontracting.
Questions: If the total DBE Goals are further broken out in specific trades, it will make the work available to more DBE contractors. Answer: Agreed. Project managers anticipate areas of potential subcontracting for each specific trade at the time of program creation, which become more specific as each project is more well defined. The contract goal calculation is based on these specific trades.

No additional comments were submitted via mail or email. After reviewing the comments, KCAB determined that no further changes or adjustments to the goal are warranted.