

Report Page	Chapter	Section	Paragraph	Comment	Source/ reference	Your name
2	Summary		1	Too often recommendations for improving spend with s/m/w/v firms involves the firms doing a bunch more - more certifications, attending more outreach, etc. etc. I link how this starts right off calling out that public agencies, primes, support orgs, and policy makers need to do more.		Tiffany Scroggs, Washington PTAC
14	1	3	3	In the federal marketplace, anything under the simplified acquisition threshold (\$250k) is automatically set aside for small businesses. This is the law. This practice, coupled with goal related to buying from Small Disadvantaged Businesses, Women, Veteran, Hubzone leads to effective results. Additionally, when a federal agency does not meet their inclusion goals per the Small Business Administration's scorecard which is published once a year, that agency cleans up their act very quickly. A "D" grade on inclusion for an agency does not lend itself to a generous congress appropriation or other resources. I recommend OMWBE consider adopting a public "scorecard" system for state agencies publicly grading them on their effectiveness. Lastly, transparency. Currently, it is very difficult to see who is winning the work. It is very difficult to navigate public contracting that is not public. More transparency will allow the marketplace to better police itself and help save small businesses time from chasing opportunities that are clearly closed to them (i.e. the community college that has used the same architect for 20 years is not a bid worth bidding - move on and go after something that is a real opportunity.)		Tiffany Scroggs, Washington PTAC
15		3	3	For the purposes of Federal SBA programs, a small business concern is.... I don't think there is a cap of \$26.29 million unless you are talking specifically about DBE certification. The other SBA certification and govcon programs strictly use the SBA Size Standards based on average revenue for past 5 years or number of employee averages for previous 12 months of the firm + affiliates. Furthermore, businesses self attest in the General Services Administration System for Award Management (not to SBA). thx. I think it's important to note the SBA standards are based on industry are are updated on a regular basis. A definition not sensitive to industry nor updated overtime is at risk of becoming outdated and inappropriate.		Tiffany Scroggs, Washington PTAC
54				The Procurement Technical Assistance Center has been omitted from Examples of providing Technical Assistance. For over 30 years, the PTAC has provided professional technical assistance specifically tailored to the needs of businesses seeking success in the public marketplace. The team of professionals is certified, using proven national best practices for providing this technical assistance. No other technical assistance provider in the state is equipped, trained or as effective in helping firms succeed in the public marketplace. Consider distinguishing technical assistance from supportive services and mentor protege programs. Professional technical assistance advisors provide holistic advising services to the business while supportive services and mentor protege programs are a useful tool that can be used by Technical Assistance providers, it is not holistic nor as sustainable. Technical Assistance should also be distinguished from training or outreach.		Tiffany Scroggs, Washington PTAC
				In some of the comments about inclusion plans and primes, I was reminded of a small business owner on the Business Diversity Advisory Group who commented on her last day on the committee that she never realized how hard it would be to be in government because you have to care about more than just a profit. She commented that she has the luxury of only caring about one thing – did she make money that day. If she did, everything else will fall into place. If she didn't, she's got a problem. Government however, has to care about many more things than that. Anyway, I think there is an assumption in the comments that primes should act more like government and care, but they really only care about profit and delivering on what their contract says so they can win more work in the future. And, that's okay. It's America. But, if policy people and advocacy people fail to recognize this, it will constantly lead to expectations not met.		Tiffany Scroggs, Washington PTAC
9	Chapter 1	Section 1	Last paragra	Sentence starting with Strategic unbundling... Doesn't read correctly. ...at a level they care prepared to handle?		Cathy Robinson

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4	Executive Summary - Small and Diverse Business as a First Choice	Public owners/prim	3	Recommend to have a definition of culture.		DES
7	1	Access to Op	3	Small and diverse businesses may not have sufficient bonding and insurance to meet prime contractor requirements. Public owners should make sure insurance requirements are commensurate to the amount of work being performed by the contractor.	See also Report page 15, Chapter 2, 4th paragraph on bond alternatives.	DES
9	1	1	7	Appears to be a typo in the 4th line: the word "care" should probably be the word "are"		DES
15	2	Access to Ca	2	Add to this paragraph: Event-based, interim invoicing would assist prime contractors make prompt payments to subcontractors. As an example, if a subcontractor achieves a major milestone or completes its work on a project, the prime contractor could generate a special purpose invoice between the regular monthly invoice dates. For some owners, the relatively modest special purpose invoice amount may facilitate payment approval lower in the organization, enabling faster payment. Also add: Public owners should be monitoring payments to at-risk subcontractors to ensure prompt payment. What penalties can be assess to the prime contractor who fails to pay their subs timely?	See also Report page 20, Chapter 2, first paragraph.	DES
2		Exec Summa	Participants	I don't see any representation by the Office of Finance Management (OFM) in the development of this document. In my opinion to remove all impactful barriers, OFM representation and participation is essential because this office may unintentionally develop policies and programs that are not conducive to develop opportunities for small and diverse businesses and it may take several years to remove those barriers.		DES
				The report is only an initial step toward achieving the actual desired improvements. Respective owners and prime contractors would need to examine their processes to include the relevant guidelines covered in the report.		DES

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				<p>that substantial effort in time and preparation was required to produce this document. Because of the large number of attachments, in some aspects it might be one of the best resource documents for information on how and why there is a lack of inclusion in Washington State. The reports, meeting minutes and analysis of disparity studies demonstrates the depth of the problem and many of the reasons that the problem continues. I think that anyone that takes the time to read the draft report and the attachments should be angered by the inhuman treatment of segments of the population of this state. I hope that anger will be channeled into actions that bring about meaningful change.</p> <p>As stated in the draft report, accountability is key to any plan that is adopted. CPARB has resisted all efforts to become accountable that the community and organizations that I am affiliated with have proposed over the last ten plus years. We are hopeful that this effort will change the established pattern at CPARB of not being accountable. CPARB also has a history of being self-servicing in terms of proposing and adopting rules and regulations that benefit its members and not the citizens of Washington State as demonstrated in the last CPARB reauthorization. It is important to know and consider these characteristics of CPARB as we review this draft document.</p> <p>The Executive Summary of this draft establishes the tone and direction of this report. A couple of examples of concern are the reference to regionalizing goals, objectives and plans. This very objectionable concept could have been avoided by having community representation on the committee with knowledge, background and experience in policies that create discrimination and disparate impacts. For many in the community that concept produces thoughts of Washington State establishing its version of a Mason-Dixon line. Utilizing an Attorney General opinion that references voluntary and aspirational goals as the establishment of legal precedence for preparing this report ignores the Attorney General opinion from 2017 which concludes that race-or-sex-conscious measures can be used in state contracting. Voluntary and aspirational goals are the reasons the state was down to 1% participation and local government is still as low as 2% participation. Regardless of how hard the committee works and how much effort is expended in time and preparation, the plan at the end of the process will be less than it should be if the bar was too low to begin with.</p> <p>CPARB helped create the discrimination and disparate impacts that exist in this state and is not exhibiting at this point the willingness to correct the problem they helped create. CPARB is utilizing the same process used during its reauthorization which allows or encourages members to propose and adopt measures that benefit themselves, public agencies or their industries and not the citizens of the state. More community representation should be on this committee and that representation cannot be selected by CPARB members, state agencies or employees.</p> <p>I cannot express how impactful a meaningful and progressive plan for CPARB could be in righting wrongs that have occurred in our communities. It is obvious to us when spectacular devastating events happen and those events get media attention. It is not as</p>		Bob Armstead, Armstead Consulting, NAMC Washington, and Washington State Civil Right Coalition
2	Executive Summary			<p>Bob, On behalf of the CPARB BE/DBI Committee we want to thank you for taking the time to read the draft report and to provide feedback. We respect your lifelong committment to racial justice and equal opportunity in public contracting. We are cognizant of your observations of CPARB as viewed by your stakeholders. As you have pointed out to us, we agree on more issues than we disagree. We consider this report as one of many continuing steps to bending the arc of justice. We as stakeholders of CPARB intend to keep your words in mind. We hope to count on your engagement and support as we develop long term strategies to address the root causes of inequity in public contracting.</p>		Olivia Yang, on Behalf of CPARB

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The following feedback was received between May 27 and June 2. Therefore the committee feels it is important to include these perspectives and feedback, but they have not been incorporated or changed the report.						
				<p>First, I want to say that I don't have any substantive comments on the text. I thought the report was really well written and provides terrific insights. This email is a general formatting suggestion only.</p> <p>There are a few places where you make suggestions as to steps various entities could take. I think it would be helpful to include headings in the narrative and/or a check list so that people who want to follow the reports suggestions can quickly reference the recommendations. For example, Chapter 1, Section 1 has a number of suggestions for Owners and Primes. I think it would be fantastic to have some headings like:</p> <ul style="list-style-type: none"> Forecasting Future Spending Create Socialization and Engagement Process Target Companies Prior to Solicitations Making Opportunities More Visible Monitor Utilization Measure Performance Create Appropriate Small Business Definition <p>I think that would make the report easier to read. Again, I applaud the substantial work that the Committee has done. I'm just trying to make sure that as many people as possible absorb the information.</p>		Robynne Thaxton, Thaxton Parkinson PLLC
				there should be a clear explanation on how this report responds to SB 5032		Port of Seattle
				Tabor 100 is misspelled		Port of Seattle
		contracting with federal funding section		Consider making those references the "federal "reflect USDOT where applicable. Usdot operates transportation agencies disadvantaged business enterprise programs. general language that just references federal may not accurately represent requirements for federal for all.		Port of Seattle
10				There are some generalizations of public agencies and their knowledge for example, on page 10 it reads goals are generic and not proportional and many owners and primes don't have know how to set justifiable goals. how is that determination made? Maybe provide some evidence for this is the case just a better support the public agency and some of these areas.		Port of Seattle
		Barriers Section		consider using plain talk in some areas when possible. I'm not sure what "exemplar" means. assuming it means exceptional of some kind, maybe consider the word best practice. also not sure how to get on this list and that may be explain somewhere if this area is important.		Port of Seattle
	1	Executive Summary		Suggest adding a paragraph on culture and one for accountability. It's in the other sections. Also state that owners set the tone and culture from the very beginning of the project and procurement. Owners are also accountability to track and understand how they are doing with inclusion efforts and performance outcomes.		Port of Seattle
		Access to Capital		Related to insurance, suggest adding other insurance instruments like subrogation agreements? Also, stress the importance of entrepreneurship and encouraging/supporting new WMBE firms, similar to the work we are engaged in on workforce development and growing the construction pipeline of workers.		Port of Seattle
				Where the report discusses WMBE firms to be competitive, suggest also adding the importance of successfully delivering on their scope of work.		Port of Seattle
		Executive Summary		Suggest that report talk about how critical it is to address the bias in our industry, for who is the "most" qualified to perform work and that WMBE or small businesses are less competent. While we do want to change the hearts and minds and cultures, we need to also act.		Port of Seattle