

## POLICY STATEMENT

### **Section 26.1, 26.23 Objectives/Policy Statement**

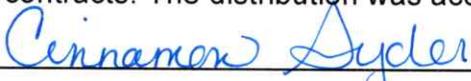
Jackson County Airport Authority has established a Disadvantaged Business Enterprise (DBE) Program in accordance with regulations of the U.S. Department of Transportation (DOT), 49 CFR Part 26. JCAA has received Federal financial assistance from the Department of Transportation, and as a condition of receiving this assistance, JCAA has signed an assurance that it will comply with 49 CFR Part 26 (hereafter referred to as "Part 26").

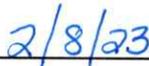
It is the policy of the JCAA to ensure that DBEs as defined in Part 26, have an equal opportunity to receive and participate in DOT-assisted contracts. It is also JCAA's policy to engage in the following actions on a continuing basis:

1. Ensure nondiscrimination in the award and administration of DOT- assisted contracts;
2. Create a level playing field on which DBEs can compete fairly for DOT- assisted contracts;
3. Ensure that the DBE Program is narrowly tailored in accordance with applicable law;
4. Ensure that only firms that fully meet 49 CFR Part 26 eligibility standards are permitted to participate as DBEs;
5. Help remove barriers to the participation of DBEs in DOT assisted contracts;
6. Promote the use of DBEs in all types of federally-assisted contracts and procurement activities;
7. Assist the development of firms that can compete successfully in the market place outside the DBE Program; and
8. Make appropriate use of the flexibility afforded to JCAAs of Federal financial assistance in establishing and providing opportunities for DBEs.

Cinnamon Snyder has been delegated as the DBE Liaison Officer. In that capacity, the Airport Director is responsible for implementing all aspects of the DBE program. Implementation of the DBE program is accorded the same priority as compliance with all other legal obligations incurred by the JCAA in its financial assistance agreements with the Department of Transportation.

JCAA has disseminated this policy statement to the Airport Authority Commissioners and all of the components of our organization. This statement has been distributed to DBE and non-DBE business communities that may perform work on JCAA DOT-assisted contracts. The distribution was accomplished by public announcement.

  
Cinnamon Snyder, Airport Director

  
Date

## **GENERAL REQUIREMENTS**

### **Section 26.1 Objectives**

The objectives are elaborated in the policy statement on the first page of this program.

### **Section 26.3 Applicability**

Jackson County Airport Authority is the recipient of Federal airport funds authorized by 49 U.S.C. 47101, *et seq.*

### **Section 26.5 Definitions**

JCAA will use terms in this program that have their meanings defined in Part 26, §26.5.

### **Section 26.7 Non-discrimination Requirements**

JCAA will never exclude any person from participation in, deny any person the benefits of, or otherwise discriminate against anyone in connection with the award and performance of any contract covered by 49 CFR Part 26 on the basis of race, color, sex, or national origin.

In administering its DBE program, JCAA will not, directly or through contractual or other arrangements, use criteria or methods of administration that have the effect of defeating or substantially impairing accomplishment of the objectives of the DBE program with respect to individuals of a particular race, color, sex, or national origin.

### **Section 26.11 Record Keeping Requirements**

#### **Reporting to DOT**

JCAA will provide data about its DBE Program to the Department as directed by DOT operating administrations.

DBE participation will be reported to FAA as follows:

JCAA will transmit to FAA annually, by or before December 1, the information required for the "Uniform Report of DBE Awards or Commitments and Payments", as described in Appendix B to Part 26. JCAA will similarly report the required information about participating DBE firms. All reporting will be done through the DBE Connect official reporting system, or another format acceptable to FAA as instructed thereby.

## Bidders List

JCAA will create and maintain a bidders list. The purpose of the list is to provide as accurate data as possible about the universe of DBE and non-DBE contractors and subcontractors who seek to work on JCAA DOT-assisted contracts, for use in helping to set overall goals. The bidders list will include the name, address, DBE and non-DBE status, age of firm, and annual gross receipts of firms.

This information will be collected in the following way(s): All bidders must complete and submit Data Collection Form for Bidders and Sub-contractors (Attachment 3) with bid. Failure to submit Data Collection Form for Bidders and Sub-contractors may cause the bidder's proposal to be rejected by the Owner as non-responsive.

### Records retention and reporting:

JCAA will maintain records documenting a firm's compliance with the requirements of this part.

## **Section 26.13 Federal Financial Assistance Agreement**

JCAA has signed the following assurances, applicable to all DOT-assisted contracts and their administration:

Assurance: - Each financial assistance agreement JCAA signs with a DOT operating administration will include the following assurance:

*The JCAA shall not discriminate on the basis of race, color, national origin, or sex in the award and performance of any DOT-assisted contract or in the administration of its DBE program or the requirements of 49 CFR Part 26. The JCAA shall take all necessary and reasonable steps under 49 CFR Part 26 to ensure nondiscrimination in the award and administration of DOT-assisted contracts. The JCAA DBE program, as required by 49 CFR Part 26 and as approved by DOT, is incorporated by reference in this agreement. Implementation of this program is a legal obligation and failure to carry out its terms shall be treated as a violation of this agreement. Upon notification to the JCAA of its failure to carry out its approved program, the Department may impose sanctions as provided for under 49 CFR Part 26 and may, in appropriate cases, refer the matter for enforcement under 18 U.S.C. 1001 and/or the Program Fraud Civil Remedies Act of 1986 (31 U.S.C. 3801 et seq.).*

Contract Assurance: JCAA will ensure that the following clause is included in each DOT-funded contract it signs with a contractor (and each subcontract the prime contractor signs with a subcontractor):

*The contractor or subcontractor shall not discriminate on the basis of race, color, national origin, or sex in the performance of this contract. The contractor shall carry out applicable requirements of 49 CFR part 26 in the award and administration of DOT-assisted contracts. Failure by the contractor to carry out these requirements is a material breach of this contract, which may result in the termination of this contract or such other remedy as the JCAA deems appropriate, which may include, but is not limited to:*

- 1) Withholding monthly progress payments;*
- 2) Assessing sanctions;*
- 3) Liquidated damages; and/or*
- 4) Disqualifying the contractor from future bidding as non-responsible.*

## **ADMINISTRATIVE REQUIREMENTS**

### **Section 26.21 DBE Program Updates**

JCAA is required to have a DBE program meeting the requirements of this part as it will receive grants for airport planning or development and will award prime contracts, cumulative total value of which exceeds \$250,000 in FAA funds in a federal fiscal year. JCAA is not eligible to receive DOT financial assistance unless DOT has approved this DBE program and JCAA is in compliance with it and Part 26. JCAA will continue to carry out this program until all funds from DOT financial assistance have been expended. JCAA does not have to submit regular updates of the DBE program document, as long as it remains in compliance. However, significant changes in the program, including those required by regulatory updates, will be submitted for DOT approval.

### **Section 26.23 Policy Statement**

The Policy Statement is elaborated on the first page of this DBE Program.

### **Section 26.25 DBE Liaison Officer (DBELO)**

The following individual has been designated as the DBE Liaison Officer for JCAA:

*Cinnamon Snyder  
Airport Director  
8301 Saracennia Road, Suite 11  
Moss Point, MS 39563*

*Telephone: (228) 475-1371  
Facsimile: (228) 475-8066  
Cinnamon\_snyder@co.jackson.ms.us*

In that capacity, the DBELO, in consultation with consultant DBE Specialist, is responsible for implementing all aspects of the DBE program and ensuring that the JCAA complies with all provisions of 49 CFR Part 26. The DBELO is the Airport Director. An organizational chart displaying the DBELO's position in the organization is included in Attachment 2 to this program.

The DBELO is responsible for developing, implementing and monitoring the DBE program, in coordination with other appropriate officials. The DBELO works with a DBE Consultant in the administration of the program. Duties and responsibilities include the following:

1. Gathers and reports statistical data and other information as required by DOT.
2. Reviews third party contracts and purchase requisitions for compliance with this program.
3. Works with all departments to set overall annual goals.
4. Works with consultants to ensure that bid notices and requests for proposals are available to DBEs in a timely manner.
5. Identifies contracts and procurements so that DBE goals are included in solicitations (both race-neutral methods and contract specific goals) and monitors results.
6. Analyzes JCAA's progress toward attainment and identifies ways to improve progress.
7. Participates in pre-bid meetings.
8. Advises the CEO/governing body on DBE matters and achievement.
9. Determines contractor compliance with good faith efforts.

#### **Section 26.27 DBE Financial Institutions**

It is the policy of the JCAA to investigate the full extent of services offered by financial institutions owned and controlled by socially and economically disadvantaged individuals in the community, to make reasonable efforts to use these institutions, and to encourage prime contractors on DOT-assisted contracts to make use of these institutions.

#### **Section 26.29 Prompt Payment Mechanisms**

JCAA requires that all subcontractors performing work on DOT-assisted contracts shall be promptly paid for work performed pursuant to their agreements, in accordance with all relevant federal, state, and local law.

In accordance with 49 CFR §26.29, the JCAA established a contract clause implementing this requirement and requires prime contractors to pay subcontractors for satisfactory performance of their contracts no later than 15 days from the prime contractor's receipt of each payment from the JCAA.

JCAA ensures prompt and full payment of retainage from the prime contractor to the subcontractor within 30 days after the subcontractor's work is satisfactorily completed. Pursuant to §26.29, JCAA has selected the following method to comply with this requirement:

To implement this measure, JCAA includes the following clause from AC 150/5370-10H in each DOT-assisted prime contract:

*a. From the total of the amount determined to be payable on a partial payment, 5 percent of such total amount will be deducted and retained by the Owner for protection of the Owner's interests. Unless otherwise instructed by the Owner, the amount retained by the Owner will be in effect until the final payment is made except as follows:*

*(1) Contractor may request release of retainage on work that has been partially accepted by the Owner in accordance with Section 50-14. Contractor must provide a certified invoice to the RPR that supports the value of retainage held by the Owner for partially accepted work.*

*(2) In lieu of retainage, the Contractor may exercise at its option the establishment of an escrow account per paragraph 90-08.*

*b. The Contractor is required to pay all subcontractors for satisfactory performance of their contracts no later than 15 days after the Contractor has received partial payment. Contractor must provide the Owner evidence of prompt and full payment of retainage held by the prime Contractor to the subcontractor within 30 days after the subcontractor's work is satisfactorily completed. A subcontractor's work is satisfactorily completed when all tasks called for in the subcontract have been accomplished and documented as required by the Owner. When the Owner has made an incremental acceptance of a portion of a prime contract, the work of a subcontractor covered by that acceptance is deemed to be satisfactorily completed.*

*c. When at least 95% of the work has been completed to the satisfaction of the RPR, the RPR shall, at the Owner's discretion and with the consent of the surety, prepare estimates of both the contract value and the cost of the remaining work to be done. The Owner may retain an amount not less than twice the contract value or estimated cost, whichever is greater, of the work remaining to be done. The remainder, less all previous payments and deductions, will then be certified for payment to the Contractor.*

## **Section 26.31      Directory**

Jackson County Airport Authority is a member of a United Certification Program (UCP), administered by Mississippi Department of Transportation (MDOT). The UCP maintains a directory identifying all firms eligible to participate as DBEs, which contains all the elements required by §26.31. The Directory is available at:

[https://mdot.ms.gov/portal/civil\\_rights](https://mdot.ms.gov/portal/civil_rights)

### **Section 26.33 Over-concentration**

MDOT has not identified that over-concentration exists in the types of work that DBEs perform.

### **Section 26.35 Business Development Programs**

JCAA has not established a Business Development Program. Jackson County Airport Authority is a member of a United Certification Program (UCP), administered by Mississippi Department of Transportation (MDOT). MDOT has established a Business Development Program.

### **Section 26.37 Monitoring Responsibilities**

JCAA implements and carries out appropriate mechanisms to ensure compliance with 49 CFR Part 26 program requirements by all program participants, including prompt payment, and describes and set forth these mechanisms in JCAA DBE program.

JCAA actively monitors participation by maintaining a running tally of actual DBE attainments, including a means of comparing these attainments to commitments.

#### Monitoring Payments to DBEs and Non-DBEs

JCAA undertakes monitoring of prime payments to subcontractors over the course of any covered contract. Such monitoring activities will be accomplished through the following method(s):

JCAA requires prime contractors to maintain records and documents of payments to subcontractors, including DBEs, for a minimum of three (3) years unless otherwise provided by applicable record retention requirements for the JCAA's financial assistance agreement, whichever is longer. These records will be made available for inspection upon request by any authorized representative of JCAA or DOT. This reporting requirement extends to all subcontractors, both DBE and non-DBE.

JCAA proactively reviews contract payments to subcontractors including DBEs. Payment reviews will evaluate whether the actual amount paid to DBE subcontractors is equivalent to the amounts reported to JCAA by the prime contractor.

Jackson County Airport Authority has established, as part of its DBE program, the following contract language to ensure prompt payment and return of retainage:

*The prime contractor agrees to pay subcontractor under this prime contract for satisfactory performance of the contract no later than fifteen (15) days from the receipt of each payment the prime contractor received from the Jackson County*

*Airport Authority. The prime contractor agrees further to return retainage payments to each subcontractor within thirty (30) days after the subcontractor's work is satisfactorily completed. Any delay of postponement of payment from the above referenced time frame may occur only for good cause following written approval of the Jackson County Airport Authority. This clause applies to both DBE and non-DBE subcontractors.*

#### Prompt Payment Dispute Resolution

JCAA will take the following steps to resolve disputes as to whether work has been satisfactorily completed for purposes of §26.29.

Work is verified by resident project representatives and engineer of record working on behalf of engineering consultants.

Prime contractors are not reimbursed for work performed by subcontractors unless and until the prime contractor ensures that the subcontractors are promptly paid for the work they have performed. This is accomplished through submission of DBE Reporting Form that lists amounts due to all subcontractors and Contractor's Affidavit of Payment of Debts and Claims.

#### Prompt Payment Complaints

Complaints by subcontractors regarding the prompt payment requirements are handled according to the following procedure.

- In cases regarding prompt payment by the prime contractor the affected subcontractor should first contact the engineer or architect of record to initiate complaint.
- If filing a prompt payment complaint with the engineer or architect of record does not result in timely and meaningful action to resolve the situation, affected subcontractor may contact JCAA's Consultant DBE Specialist or JCAA's DBE Liaison Officer (DBELO).
- If filing a prompt payment complaint with the DBE Specialist or DBELO does not result in timely and meaningful action by JCAA to resolve prompt payment disputes, affected subcontractor may contact the responsible FAA contact.
- Pursuant to Sec. 157 of the FAA Reauthorization Act of 2018, all complaints related to prompt payment will be reported in a format acceptable to the FAA, including the nature and origin of the complaint and its resolution.

#### Enforcement Actions for Noncompliance of Participants

JCAA will provide appropriate means to enforce the requirements of §26.29. These means include:

- Withholding of payments to the contractor under the contract until the contractor complies; and/or
- If contractor fails to meet the goal, JCAA may withhold from the contract price an amount equal to the difference in the DBE dollar value contracted for and the dollar value achieved in documented DBE participation or any lesser amount as deemed appropriate by JCAA which dollar value shall be considered liquidated damages for failure to perform the DBE requirements of this contract and for which contractor agrees to be bound; and/or
- Cancellation, termination, or suspension of the contract, in whole or in part; and/or
- Payment by the contractor to JCAA of an amount equal to the difference in the DBE dollar value achieved in documented DBE participation or any lesser amount as deemed appropriate by JCAA, which dollar value shall be considered liquidated damages for failure to perform the DBE requirements of this contract and for which contractor agrees to be bound; and/or
- Debar the contractor involved from bidding on JCAA projects.

#### Monitoring Contracts and Work Sites

JCAA reviews contracting records and engages in active monitoring of work sites to ensure that work committed to DBEs at contract award or subsequently (*e.g.*, as the result of modification to the contract) is actually performed by the DBEs to which the work was committed. Work site monitoring is performed by consultant. JCAA will maintain written certification that work sites have been monitored for this purpose.

#### **Section 26.39 Fostering small business participation**

Jackson County Airport Authority encourages small business participation and takes all reasonable steps to eliminate obstacles to their participation.

### **SUBPART C – GOALS, GOOD FAITH EFFORTS, AND COUNTING**

#### **Section 26.43 Set-asides or Quotas**

JCAA does not use quotas in any way in the administration of this DBE program.

#### **Section 26.45 Overall Goals**

JCAA will establish an overall DBE goal covering a three-year federal fiscal year period if it anticipates awarding DOT-funded prime contracts the cumulative total value of which exceeds \$250,000 in DOT funds during any one or more of the reporting fiscal years within the three-year goal period. In accordance with §26.45(f), JCAA will submit

its Overall Three-year DBE Goal to FAA by August 1<sup>st</sup> of the year in which the goal is due, as required by the schedule established by and posted to the website of FAA.

[https://www.faa.gov/about/office\\_org/headquarters\\_offices/acr/bus\\_ent\\_program/media/Schedule\\_of\\_DBE\\_and\\_ACDBE\\_Reporting\\_Requirements\\_Dec\\_2017\\_Issue.pdf](https://www.faa.gov/about/office_org/headquarters_offices/acr/bus_ent_program/media/Schedule_of_DBE_and_ACDBE_Reporting_Requirements_Dec_2017_Issue.pdf)

The DBE goals will be established in accordance with the 2-step process as specified in 49 CFR Part 26.45. If JCAA does not anticipate awarding prime contracts the cumulative total value of which exceeds \$250,000 in DOT funds during any of the years within the three-year reporting period, an overall goal will not be developed. However, this DBE Program will remain in effect and JCAA will seek to fulfill the objectives outlined in 49 CFR Part 26.1.

Step 1. The first step is to determine a base figure for the relative availability of DBEs in the market area. JCAA will use *DBE Directory information and Census Bureau Data* as a method to determine the base figure. JCAA understands that the exclusive use of a list of prequalified contractors or plan holders, or a bidders list that does not comply with the requirements of 49 CFR Part 26.45(c)(2), is not an acceptable alternative means of determining the availability of DBEs.

Step 2. The second step is to adjust, if necessary, the “base figure” percentage from Step 1 so that it reflects as accurately as possible the DBE participation the JCAA would expect in the absence of discrimination. Adjustments may be made based on past participation, information from a disparity study (to the extent it is not already accounted for in the base goal), and/or information about barriers to entry to past competitiveness of DBEs on contracts. JCAA will examine all of the evidence available in its jurisdiction to determine what adjustment, if any, is needed. If the evidence does not suggest an adjustment is necessary, then no adjustment shall be made.

Any methodology selected will be based on demonstrable evidence of local market conditions and be designed to ultimately attain a goal that is rationally related to the relative availability of DBEs in the JCAA market.

In establishing the overall goal, JCAA will provide for consultation and publication. This includes consultation with minority, women’s and general contractor groups, community organizations, and other officials or organizations which could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and the efforts by JCAA to establish a level playing field for the participation of DBEs. The consultation will include a scheduled, direct, interactive exchange (e.g., a face-to-face meeting, video conference, teleconference) with as many interested stakeholders as possible focused on obtaining information relevant to the goal setting process, and it will occur before JCAA is required to submit the goal methodology to the operating administration for review pursuant to §26.45(f). The goal submission will document the consultation process in which JCAA engaged. Notwithstanding paragraph (f)(4) of §26.45, the proposed goal will not be implemented until this requirement is met.

In addition to the consultation described above, JCAA will publish a notice announcing the proposed overall goal. The notice will be posted on JCAA's official internet web site. If the proposed goal changes following review by FAA, the revised goal will be posted on the official internet web site.

JCAA will begin using the overall goal on October 1 of the relevant period, unless other instructions from FAA have been received.

### Project Goals

If permitted or required by the FAA Administrator, an overall goal may be expressed as a percentage of funds for a particular grant or project or group of grants and/or projects, including entire projects. Like other overall goals, a project goal may be adjusted to reflect changed circumstances, with the concurrence of the appropriate operating administration. A project goal is an overall goal and must meet all the substantive and procedural requirements of this section pertaining to overall goals. A project goal covers the entire length of the project to which it applies. The project goal will include a projection of the DBE participation anticipated to be obtained during each fiscal year covered by the project goal. The funds for the project to which the project goal pertains are separated from the base from which the regular overall goal, applicable to contracts not part of the project covered by a project goal, is calculated.

If a goal is established on a project basis, the goal will be used by the time of the first solicitation for a DOT-assisted contract for the project.

### Prior Operating Administration Concurrence

JCAA understands that prior FAA concurrence with the overall goal is not required. However, if the FAA review suggests that the overall goal has not been correctly calculated or that the method employed by JCAA for calculating goals is inadequate, FAA may, after consulting with JCAA, adjust the overall goal or require that the goal be adjusted by JCAA. The adjusted overall goal is binding. In evaluating the adequacy or soundness of the methodology used to derive the overall goal, the U.S. DOT operating administration will be guided by the goal setting principles and best practices identified by the Department in guidance issued pursuant to §26.9.

A description of the methodology to calculate the overall goal and the goal calculations can be found in Attachment 5 to this program.

### **Section 26.47 Failure to meet overall goals**

JCAA cannot be penalized or treated by the Department as being in noncompliance with Part 26, because DBE participation falls short of an overall goal, unless JCAA fails to administer its DBE program in good faith.

JCAA understands that to be considered to be in compliance with this part, an approved DBE Program and overall DBE goal, if applicable, must be maintained, and this DBE Program must be administered in good faith.

JCAA understands that if the awards and commitments shown on the Uniform Report of Awards or Commitments and Payments at the end of any fiscal year are less than the overall goal applicable to that fiscal year, the following actions must be taken in order to be regarded by the Department as implementing this DBE Program in good faith:

- (1) Analyze in detail the reasons for the difference between the overall goal and the awards and commitments in that fiscal year;
- (2) Establish specific steps and milestones to correct the problems identified in the analysis to enable the goal for the new fiscal year to be fully met;

**Section 26.49      How are overall goals established for transit vehicle manufacturers?**

This section is not applicable to JCAA.

**Section 26.51      Means JCAAs Use to Meet Overall Goals**

**Breakout of Estimated Race-Neutral & Race-Conscious Participation**

JCAA will meet the maximum feasible portion of its overall goal by using race-neutral means of facilitating race-neutral DBE participation. Race-neutral DBE participation includes any time a DBE wins a prime contract through customary competitive procurement procedures or is awarded a subcontract on a prime contract that does not carry a DBE contract goal.

Race-neutral means include, but are not limited to the following:

- (1) Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitate participation by DBEs and other small businesses;
- (2) Disseminating information on contracting procedures and specific contract opportunities;

- (3) Ensuring distribution of the DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors.
- The breakout of estimated race-neutral and race-conscious participation can be found in Attachment 5 to this program.

Contract Goals

Contract goals will be established only on those DOT-assisted contracts that have subcontracting possibilities. A contract goal need not be established on every such contract, and the size of contract goals will be adapted to the circumstances of each such contract (e.g., type and location of work, availability of DBEs to perform the particular type of work).

Contract goals will be expressed as a percentage of the total amount of a DOT-assisted contract OR the Federal share of a DOT-assisted contract.

### **Section 26.53      Good Faith Efforts Procedures in Situations where there are Contract Goals**

#### Demonstration of good faith efforts (pre-award)

In cases where a contract goal has been established, the contract in question will only be awarded to a bidder/offeror that has made good faith efforts to meet the contract goal. The bidder/offeror can demonstrate that it has made good faith efforts by either meeting the contract goal or documenting that it has made adequate good faith efforts to do so.

Consultant DBE Specialist is responsible for determining whether a bidder/offeror who has not met the contract goal has documented sufficient good faith efforts to be regarded as *Responsive*.

JCAA will ensure that all information is complete and accurate and adequately documents the bidder/offeror's good faith efforts before committing to the performance of the contract by the bidder/offeror.

In all solicitations for DOT-assisted contracts for which a contract goal has been established, the following information will be required of every bidder/offeror:

- (1) Award of the contract will be conditioned on meeting the requirements of this section;
- (2) All bidders or offerors will be required to submit the following information to the JCAA, at the time provided in paragraph (3) of this section:
  - (i) The names and addresses of DBE firms that will participate in the contract;
  - (ii) A description of the work that each DBE will perform. To count toward meeting a goal, each DBE firm must be certified in a NAICS code applicable to the kind of work the firm would perform on the contract;
  - (iii) The dollar amount of the participation of each DBE firm participating;
  - (iv) Written documentation of the bidder/offeror's commitment to use a DBE subcontractor whose participation it submits to meet a contract goal; and
  - (v) Written confirmation from each listed DBE firm that it is participating in the contract in the kind and amount of work provided in the prime contractor's commitment.

- (vi) If the contract goal is not met, evidence of good faith efforts (as elaborated in Appendix A of Part 26). The documentation of good faith efforts must include copies of each DBE and non-DBE subcontractor quote submitted to the bidder when a non-DBE subcontractor was selected over a DBE for work on the contract; and
- (3) The bidder/offeror will be required to present the information stipulated in paragraph (2) of this section: under sealed bid procedures, as a matter of responsiveness.

#### Administrative reconsideration

Within 5 days of being informed by JCAA that it is not *responsive* because it has not documented adequate good faith efforts, a bidder/offeror may request administrative reconsideration. Bidder/offerors should make this request in writing to the following reconsideration official:

*Cinnamon Snyder*  
*Airport Director*  
*8301 Saracennia Road, Suite 11*  
*Moss Point, MS 39563*

*Telephone: (228) 475-1371*  
*Facsimile: (228) 475-8066*  
*Cinnamon\_snyder@co.jackson.ms.us*

The reconsideration official will not have played any role in the original determination that the bidder/offeror did not document sufficient good faith efforts.

As part of this reconsideration, the bidder/offeror will have the opportunity to provide written documentation or argument concerning the issue of whether it met the goal or made adequate good faith efforts to do so. The bidder/offeror will have the opportunity to meet in person with the reconsideration official to discuss the issue of whether the goal was met or the bidder/offeror made adequate good faith efforts to do. The bidder/offeror will be sent a written decision on reconsideration, explaining the basis for finding that the bidder did or did not meet the goal or make adequate good faith efforts to do so. The result of the reconsideration process is not administratively appealable to the Department of Transportation.

#### Good Faith Efforts procedural requirements (post-solicitation)

The awarded contractor will be required to make available upon request a copy of all DBE subcontracts. The contractor shall ensure that all subcontracts or agreements with DBEs to supply labor or materials include all required contract provisions and mandate that the subcontractor and all lower tier subcontractors perform in accordance with the provisions of Part 26.

Prime contractors will be prohibited from terminating a DBE subcontractor listed in response to a covered solicitation (or an approved substitute DBE firm) without the prior written consent of JCAA. This includes, but is not limited to, instances in which a prime contractor seeks to perform work originally designated for a DBE subcontractor with its own forces or those of an affiliate, a non-DBE firm, or another DBE firm.

Such written consent will be provided only if JCAA agrees, for reasons stated in the concurrence document, that the prime contractor has good cause to terminate the DBE firm. For purposes of this paragraph, good cause includes the following circumstances:

- (1) The listed DBE subcontractor fails or refuses to execute a written contract;
- (2) The listed DBE subcontractor fails or refuses to perform the work of its subcontract in a way consistent with normal industry standards. Provided however, that good cause does not exist if the failure or refusal of the DBE subcontractor to perform its work on the subcontract results from the bad faith or discriminatory action of the prime contractor;
- (3) The listed DBE subcontractor fails or refuses to meet the prime contractor's reasonable, non-discriminatory bond requirements.
- (4) The listed DBE subcontractor becomes bankrupt, insolvent, or exhibits credit unworthiness;
- (5) The listed DBE subcontractor is ineligible to work on public works projects because of suspension and debarment proceedings pursuant to 2 CFR Parts 180, 215 and 1,200 or applicable state law;
- (6) JCAA determined that the listed DBE subcontractor is not a responsible contractor;
- (7) The listed DBE subcontractor voluntarily withdraws from the project and provides JCAA written notice of its withdrawal;
- (8) The listed DBE is ineligible to receive DBE credit for the type of work required;
- (9) A DBE owner dies or becomes disabled with the result that the listed DBE contractor is unable to complete its work on the contract;
- (10) Other documented good cause that JCAA has determined compels the termination of the DBE subcontractor. Provided, that good cause does not exist if the prime contractor seeks to terminate a DBE it relied upon to obtain the contract so that the prime contractor can self-perform the work for which the DBE contractor was engaged or so that the prime contractor can substitute another DBE or non-DBE contractor after contract award.

Before transmitting to JCAA a request to terminate and/or substitute a DBE subcontractor, the prime contractor must give notice in writing to the DBE subcontractor, with a copy to JCAA, of its intent to request to terminate and/or substitute the DBE, and the reason(s) for the request.

The prime contractor must give the DBE five days to respond to the prime contractor's notice and advise JCAA and the prime contractor of the reasons, if any, why the DBE

objects to the proposed termination of its subcontract and why the prime contractor's action should not be approved. If required in a particular case as a matter of public necessity (e.g., safety), a response period shorter than five days may be provided.

In addition to post-award terminations, the provisions of this section apply to pre-award deletions of or substitutions for DBE firms put forward by offerors in negotiated procurements.

Each prime contract will include a provision stating:

*The contractor shall utilize the specific DBEs listed in the contractor's bid response to perform the work and supply the materials for which each is listed unless the contractor obtains prior written consent of JCAA as provided in 49 CFR Part 26, §26.53(f). Unless such consent is provided, the contractor shall not be entitled to any payment for work or material unless it is performed or supplied by the listed DBE.*

JCAA will require a contractor to make good faith efforts to replace a DBE that is terminated or has otherwise failed to complete its work on a contract with another certified DBE. These good faith efforts shall be directed at finding another DBE to perform at least the same amount of work under the contract as the DBE that was terminated, to the extent needed to meet the contract goal that was established for the procurement. The good faith efforts shall be documented by the contractor. If JCAA requests documentation from the contractor under this provision, the contractor shall submit the documentation within 7 days, which may be extended for an additional 7 days if necessary at the request of the contractor. JCAA shall provide a written determination to the contractor stating whether or not good faith efforts have been demonstrated.

If the contractor fails or refuses to comply in the time specified, the contracting office/representative of JCAA may issue an order stopping all or part of payment/work until satisfactory action has been taken. If the contractor still fails to comply, the contracting officer may issue a termination for default proceeding.

### **Section 26.55      Counting DBE Participation**

DBE participation will be counted toward overall and contract goals as provided in §26.55. The participation of a DBE subcontractor will not be counted toward a contractor's final compliance with its DBE obligations on a contract until the amount being counted has actually been paid to the DBE.

In the case of post-award substitutions or additions, if a firm is not currently certified as a DBE in accordance with the standards of subpart D of this part at the time of the execution of the contract, the firm's participation will not be counted toward any DBE goals, except as provided for in §26.87(j).

Pursuant to Sec. 150 of the FAA Reauthorization Act of 2018, firms that exceed the business size standard in § 26.65(b) will remain eligible for DBE certification and credit on FAA-funded projects as long as they do not exceed the small business size standard, as adjusted by the United States Small Business Administration, for the NAICS code(s) in which they are certified.

## **SUBPART D – CERTIFICATION STANDARDS**

### **Section 26.61 – 26.73      Certification Process**

JCAA is a non-certifying member of the Mississippi DOT Unified Certification Program (UCP). MDOT UCP will use the certification standards of Subpart D of Part 26 to determine the eligibility of firms to participate as DBEs in DOT-assisted contracts. To be certified as a DBE, a firm must meet all certification eligibility standards. Certifying MDOT UCP members make all certification decisions based on the facts as a whole.

For information about the certification process or to apply for certification, firms should contact:

*Carolyn F. Bell*  
*Director, Civil Rights Division*  
*401 North West Street*  
*Jackson, MS 39201*  
*601-359-7344*  
*601-576-4504*  
[cbell@mdot.ms.gov](mailto:cbell@mdot.ms.gov)

The Uniform Certification Application form and documentation requirements are found in Attachment 8 to this program.

## **SUBPART E – CERTIFICATION PROCEDURES**

### **Section 26.81      Unified Certification Programs**

Jackson County Airport Authority is a member of a Unified Certification Program (UCP) administered by Mississippi Department of Transportation. The UCP meets all of the requirements of this section.

MDOT's certification "Roadmap" to applicants can be found at:

<https://mdot.ms.gov/documents/Civil%20Rights/Programs/DBE/MS%20Roadmap%20to%20Certification.pdf>

## **SUBPART F – COMPLIANCE AND ENFORCEMENT**

### **Section 26.101 Compliance Procedures Applicable to JCAA**

JCAA understands that if it fails to comply with any requirement of this part, JCAA may be subject to formal enforcement action under §26.103 or §26.105 or appropriate program sanctions by the concerned operating administration, such as the suspension or termination of Federal funds, or refusal to approve projects, grants or contracts until deficiencies are remedied. Program sanctions may include, in the case of the FAA program, actions consistent with 49 U.S.C. 47106(d), 47111(d), and 47122.

### **Section 26.109 Information, Confidentiality, Cooperation and intimidation or retaliation**

Information that may reasonably be regarded as confidential business information, consistent with Federal, state, and local law will be safeguarded from disclosure to third parties.

Notwithstanding any provision of Federal or state law, information that may reasonably be construed as confidential business information will not be released to any third party without the written consent of the firm that submitted the information, including applications for DBE certification and supporting information. However, this information will be transmitted to DOT in any certification appeal proceeding under §26.89 or to any other state to which the individual's firm has applied for certification under §26.85.

## **ATTACHMENTS**

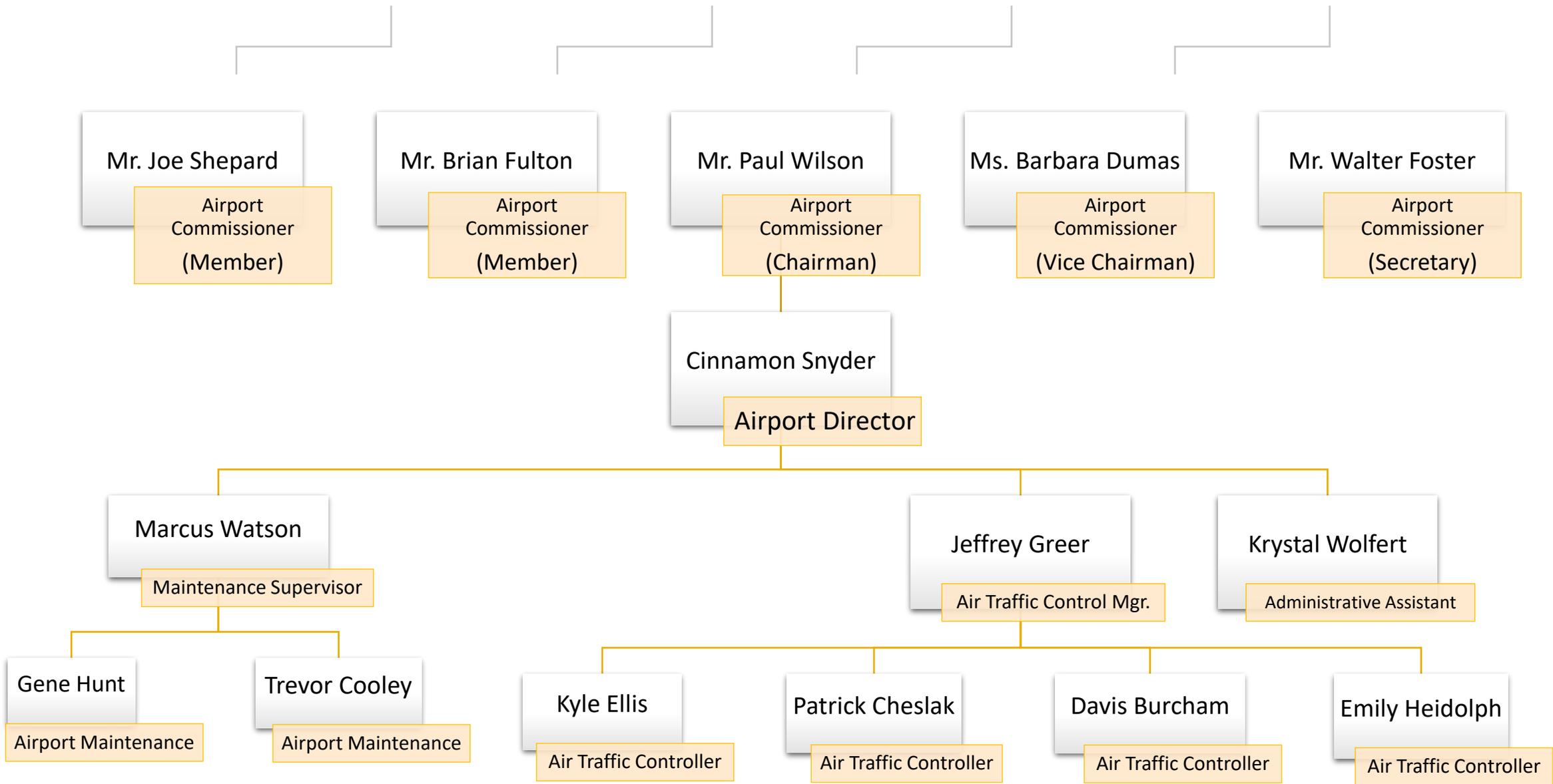
- Attachment 1 Regulations: 49 CFR Part 26 or website link
- Attachment 2 Organizational Chart
- Attachment 3 Bidder's List Collection Form
- Attachment 4 DBE Directory or link to DBE Directory
- Attachment 5 Overall Goal Calculations
- Attachment 6 Demonstration of Good Faith Efforts or Good Faith Effort Plan - Forms 1 & 2
- Attachment 7 DBE Monitoring and Enforcement Mechanisms
- Attachment 8 DBE Certification Application Form
- Attachment 9 State's UCP Agreement

**ATTACHMENT 1**

Regulations: 49 CFR Part 26 link to website.

<https://www.fhwa.dot.gov/hep/guidance/superseded/49cfr26.cfm>

**ATTACHMENT 2**  
**Organizational Chart**



### ATTACHMENT 3

#### Data Collection Form for Bidders and Sub-contractors

**Information below must be collected from every bidder who submits a quote/bid and every potential subcontractor who submitted a quote/bid to each bidder. §26.11(c) requires recipients to collect information from all bidders and subcontractors, including unsuccessful ones.**

Firm Name	Firm Address/ Phone #	DBE or Non-DBE Status (verify via State's UCP Directory)	Age of Firm	Annual Gross Receipts
			<input type="checkbox"/> Less than 1 year <input type="checkbox"/> 1- 3 years <input type="checkbox"/> 4-7 years <input type="checkbox"/> 8-10 years <input type="checkbox"/> More than 10 years	<input type="checkbox"/> Less than \$500K <input type="checkbox"/> \$500K - \$1 million <input type="checkbox"/> \$1-2 million <input type="checkbox"/> \$2-5 million <input type="checkbox"/> Greater than \$5 million
			<input type="checkbox"/> Less than 1 year <input type="checkbox"/> 1- 3 years <input type="checkbox"/> 4-7 years <input type="checkbox"/> 8-10 years <input type="checkbox"/> More than 10 years	<input type="checkbox"/> Less than \$500K <input type="checkbox"/> \$500K - \$1 million <input type="checkbox"/> \$1-2 million <input type="checkbox"/> \$2-5 million <input type="checkbox"/> Greater than \$5 million
			<input type="checkbox"/> Less than 1 year <input type="checkbox"/> 1- 3 years <input type="checkbox"/> 4-7 years <input type="checkbox"/> 8-10 years <input type="checkbox"/> More than 10 years	<input type="checkbox"/> Less than \$500K <input type="checkbox"/> \$500K - \$1 million <input type="checkbox"/> \$1-2 million <input type="checkbox"/> \$2-5 million <input type="checkbox"/> Greater than \$5 million
			<input type="checkbox"/> Less than 1 year <input type="checkbox"/> 1- 3 years <input type="checkbox"/> 4-7 years <input type="checkbox"/> 8-10 years <input type="checkbox"/> More than 10 years	<input type="checkbox"/> Less than \$500K <input type="checkbox"/> \$500K - \$1 million <input type="checkbox"/> \$1-2 million <input type="checkbox"/> \$2-5 million <input type="checkbox"/> Greater than \$5 million
			<input type="checkbox"/> Less than 1 year <input type="checkbox"/> 1- 3 years <input type="checkbox"/> 4-7 years <input type="checkbox"/> 8-10 years <input type="checkbox"/> More than 10 years	<input type="checkbox"/> Less than \$500K <input type="checkbox"/> \$500K - \$1 million <input type="checkbox"/> \$1-2 million <input type="checkbox"/> \$2-5 million <input type="checkbox"/> Greater than \$5 million
			<input type="checkbox"/> Less than 1 year <input type="checkbox"/> 1- 3 years <input type="checkbox"/> 4-7 years <input type="checkbox"/> 8-10 years <input type="checkbox"/> More than 10 years	<input type="checkbox"/> Less than \$500K <input type="checkbox"/> \$500K - \$1 million <input type="checkbox"/> \$1-2 million <input type="checkbox"/> \$2-5 million <input type="checkbox"/> Greater than \$5 million

**ATTACHMENT 4**

*web link to MDOT DBE directory*

[https://mdot.ms.gov/bidsystem\\_data/bidderspdf/DBE%20Listing.pdf](https://mdot.ms.gov/bidsystem_data/bidderspdf/DBE%20Listing.pdf)

**ATTACHMENT 5**

Overall DBE Three-Year Goal Methodology

**Name of JCAA:** Trent Lott International Airport

**Goal Period:** FY-2023-2024-2025 – October 1, 2022 through September 30, 2025

<b>DOT-assisted contract amount:</b>	FY-2023	\$1,018,170
	FY-2024	\$3,538,800
	FY-2025	\$2,979,000
	<b>Total</b>	<b><u>\$7,535,970</u></b>

**Overall Three-Year Goal:** 9.85%, to be accomplished through 9.85% RC and 0% RN

**Total dollar amount to be expended on DBEs:** \$741,916

**Describe the Number and Type of Contracts that the airport anticipates awarding:**

Contracts Fiscal Year #1

1. Rehabilitate Taxiways, Phase 2
2. North Apron Expansion (Engineering Design / NEPA Permitting)

Contracts Fiscal Year #2

1. North Apron Expansion - Construction
2. Construct Connector Taxiway
3. Rehabilitate Air Traffic Control Tower

Contracts Fiscal Year #3

1. Rehabilitate Main Apron
2. Construct / Rehabilitate / Expand Terminal Building

**Market Area:** Jackson County, Mississippi  
Harrison County, Mississippi  
Hancock County, Mississippi

**Method: MDOT DBE Directory**

[https://mdot.ms.gov/bidsystem\\_data/bidderspdf/DBE%20Listing.pdf](https://mdot.ms.gov/bidsystem_data/bidderspdf/DBE%20Listing.pdf)

and

Census Bureau Data from <https://data.census.gov/cedsci/>

**Step 1.** Actual relative availability of DBEs

The base figure for the relative availability was calculated as follows:

NAICS	Type of Work	MDOT DBEs	All Firms
237110	Water & Sewer Lines & Related Structures	3	16
237310	Highway, Streets & Bridges Construction	10	16
237990	Other Heavy and Civil Eng. Construction	2	10
238120	Structural Steel & Precast Concrete Contractors	1	6
238910	Site Prep Contractors	7	30
423320	Brick, Stone, & Related Material Wholesaler	2	5
484110	General Freight – Local	4	10
541380	Testing Laboratories	1	7
561320	Temporary Help Service	3	35
561730	Landscaping Services (erosion control)	5	70
<b>TOTAL</b>		<b>38</b>	<b>205</b>

**Step 1:** Divide the number of DBEs by the number of all businesses to derive a base figure for the relative availability of DBEs in marketplace.

$$\text{Base figure} = \frac{\text{Ready, willing and able DBEs for specific projects}}{\text{All firms ready, willing and able for specific projects}} = \frac{38}{205} \times 100 = 18.54\%$$

**Step 2: Adjustments to Step 1 base figure**

After calculating a base figure of the relative availability of DBEs, evidence was examined to determine what, if any, adjustment to the base figure was needed in order to arrive at the overall goal.

With the exception of two recent projects, no historical data on DBE participation is available at JCAA to reference; however, JCAA believes, that the base figure DBE percentage of 18.54% is not attainable.

One project was bid in 2019 with 8.83% DBE participation attained; second project was bid in 2022 with 10.86% DBE participation.

$$8.83\% + 10.86\% = 19.69\%$$

$$19.69\% / 2 = 9.85\%$$

We took the average of DBE participation obtained in two historical projects with similar scopes of work to upcoming potential projects, therefore; the Airport Authority is decreasing its Step 1 base figure for a total overall goal of 9.85% for FY2023-2025.

The base goal projection for FY2023-2025 is: **9.85%**

### **Breakout of Estimated “Race and Gender Neutral” (RN) and “Race and Gender Conscious” (RC) Participation.**

JCAA will meet the maximum feasible portion of the overall goal by using RN means of facilitating DBE participation.

1. Arranging solicitations, times for the presentation of bids, quantities, specifications, and delivery schedules in ways that facilitates DBE, and other small businesses, participation;
2. Ensuring distribution of DBE directory, through print and electronic means, to the widest feasible universe of potential prime contractors;

JCAA estimates that in meeting the established overall goal of 9.85%, it will obtain 0% from RN participation and 9.85% through RC measures.

The JCAA does not have a history of DBE participation or over-achievement of goals to reference and expects to obtain its DBE participation through the use of DBE contract goals or a conscious effort to obtain DBE participation. Therefore, the entire goal of 9.85% is to be obtained through race-conscious participation.

JCAA will adjust the estimated breakout of RN and RC DBE participation as needed to reflect actual DBE participation and track and report RN and RC participation separately. For reporting purposes, RN DBE participation includes, but is not necessarily limited to the following: DBE participation through a prime contract obtained 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.

### **Consultation:**

In establishing the overall goal, our process included attempted consultation with minority, women’s, and contractor groups and other officials or organizations which could be expected to have information concerning the availability of disadvantaged and non-disadvantaged businesses, the effects of discrimination on opportunities for DBEs, and JCAA’s efforts to establish a level playing field for the participation of DBEs. The consultation included a scheduled, direct, interactive exchange with as many interested stakeholders as possible focused on obtaining information relevant to the goal setting process, and was conducted before the goal methodology was submitted to the operating administration for review. Details of the consultation are as follows.

The consultation engaged in was a *face-to-face meeting held at JCAA offices at 2:00 PM, January 30, 2023.*

The only comments received were related to size and scope of work for upcoming projects within 3-year goal period.

A notice of the proposed goal was published on JCAA's official airport authority website before the methodology was submitted to FAA.

If the proposed goal changes following review by *FAA*, the revised goal will be posted on JCAA's official website.

Notwithstanding paragraph (f)(4) of §26.45, JCAA's proposed goals will not be implemented until this requirement has been met.

**ATTACHMENT 6**

**Demonstration of Good Faith Efforts - Forms 1 & 2**

**FORM 1: DISADVANTAGED BUSINESS ENTERPRISE (DBE) UTILIZATION**

The undersigned bidder/offeror has satisfied the requirements of the bid specification in the following manner:

Bidder/offeror has met the DBE contract goal. The bidder/offeror is committed to a minimum of \_\_\_\_ % DBE utilization on this contract.

Bidder/offeror has not met the DBE contract goal. The bidder/offeror is committed to a minimum of \_\_\_\_% DBE utilization on this contract and has submitted documentation demonstrating good faith efforts.

Legal name of bidder/offeror's firm: \_\_\_\_\_

Bidder/Offeror Representative:

\_\_\_\_\_  
Name & Title

\_\_\_\_\_  
Signature Date

**LETTER OF INTENT**

**(Must be submitted with Bid for each DBE subcontractor)**

Name of bidder/offeror's firm: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Name of DBE firm: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_

Description of work to be performed by DBE firm:

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The bidder/offeror is committed to utilizing the above-named DBE firm for the work described above. The total expected dollar value of this work is \$ \_\_\_\_\_.

**Affirmation**

The above named DBE firm affirms that it will perform the portion of the contract for the estimated dollar value as stated above.

By: \_\_\_\_\_  
(Signature) (Title)

**If the bidder/offeror does not receive award of the prime contract, any and all representations in this Letter of Intent shall be null and void.**

## **ATTACHMENT 7**

### **DBE Monitoring and Enforcement Mechanisms**

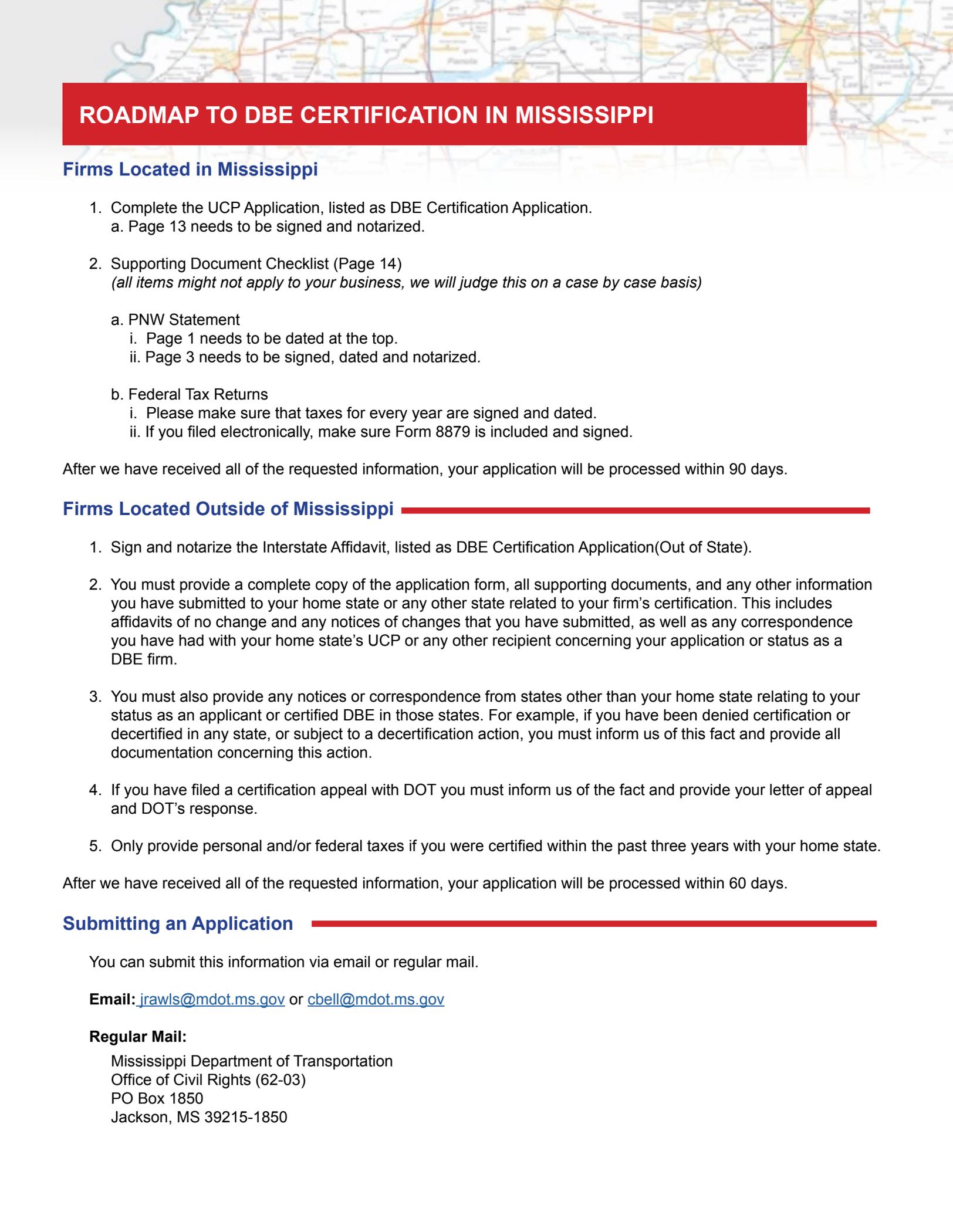
The JCAA has available several remedies to enforce the DBE requirements contained in its contracts, including, but not limited to, the following:

1. Breach of contract action, pursuant to the terms of the contract.

In addition, the Federal government has available several enforcement mechanisms that it may apply to firms participating in the DBE problem, including, but not limited to, the following:

1. Suspension or debarment proceedings pursuant to 49 CFR Part 26
2. Enforcement action pursuant to 49 CFR Part 31
3. Prosecution pursuant to 18 USC 1001.

**ATTACHMENT 8**  
DBE Certification Application Form  
*(New form October 2, 2014)*



# ROADMAP TO DBE CERTIFICATION IN MISSISSIPPI

## Firms Located in Mississippi

1. Complete the UCP Application, listed as DBE Certification Application.
  - a. Page 13 needs to be signed and notarized.
2. Supporting Document Checklist (Page 14)  
*(all items might not apply to your business, we will judge this on a case by case basis)*
  - a. PNW Statement
    - i. Page 1 needs to be dated at the top.
    - ii. Page 3 needs to be signed, dated and notarized.
  - b. Federal Tax Returns
    - i. Please make sure that taxes for every year are signed and dated.
    - ii. If you filed electronically, make sure Form 8879 is included and signed.

After we have received all of the requested information, your application will be processed within 90 days.

## Firms Located Outside of Mississippi

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1. Sign and notarize the Interstate Affidavit, listed as DBE Certification Application(Out of State).
2. You must provide a complete copy of the application form, all supporting documents, and any other information you have submitted to your home state or any other state related to your firm's certification. This includes affidavits of no change and any notices of changes that you have submitted, as well as any correspondence you have had with your home state's UCP or any other recipient concerning your application or status as a DBE firm.
3. You must also provide any notices or correspondence from states other than your home state relating to your status as an applicant or certified DBE in those states. For example, if you have been denied certification or decertified in any state, or subject to a decertification action, you must inform us of this fact and provide all documentation concerning this action.
4. If you have filed a certification appeal with DOT you must inform us of the fact and provide your letter of appeal and DOT's response.
5. Only provide personal and/or federal taxes if you were certified within the past three years with your home state.

After we have received all of the requested information, your application will be processed within 60 days.

## Submitting an Application

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You can submit this information via email or regular mail.

**Email:** [jrawls@mdot.ms.gov](mailto:jrawls@mdot.ms.gov) or [cbell@mdot.ms.gov](mailto:cbell@mdot.ms.gov)

**Regular Mail:**

Mississippi Department of Transportation  
Office of Civil Rights (62-03)  
PO Box 1850  
Jackson, MS 39215-1850

**ATTACHMENT 9**  
State's UCP Agreement

**CERTIFICATION FOR COMPLIANCE**  
**WITH THE**  
**MISSISSIPPI UNIFIED CERTIFICATION PROGRAM**

**WHEREAS,** A final rule revising the USDOT's regulations for its Disadvantaged Business Enterprise (DBE) Program was published in the *Federal Register* on February 2, 1999, and

**WHEREAS,** These regulations contained in 49 CFR Part 26.81, as amended, became effective on March 4, 1999, and

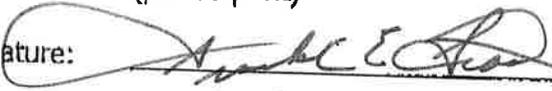
**WHEREAS,** 49 CFR Part 26.81, Subpart E, as amended, of the Regulation details the requirements for a Unified Certification Program (UCP) including a "one-stop shopping" certification provision intended to enable DBE's, once certified by any one recipient of USDOT funds, to participate in the programs of other recipients, and

**WHEREAS,** All USDOT recipients within each state must be agree to comply with the UCP prior to approval by the Secretary of the USDOT, and

**WHEREAS,** The Mississippi Unified Certification Program (MUCP) is established for all USDOT recipients within the State of Mississippi to comply with the requirements contained in 49 CFR Part 26.81, Subpart E, as amended.

**NOW, THEREFORE,** It is understood and agreed that the undersigned, a recipient of U.S. DOT funds, agrees with and will comply with all of the provisions of 49 CFR Part 26.81, Subpart E, as amended, and the Mississippi Unified Certification Program *and further agrees to cooperate fully with the MUCP and be bound by its decisions or actions concerning this program.*

By: FRANKLIN E. LEACH  
(please print)

Signature: 

Title: President

Agency: JACKSON COUNTY BOARD OF SUPERVISORS

Location: PASCOGOLA, JACKSON COUNTY, MISSISSIPPI  
(city, town, county, etc.)