

Town of Carrboro, NC
2025 Disparity Study

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CARRBORO TOWN HALL



TOWN OF CARRBORO • NC

**Executive
Summary**



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I.
**EXECUTIVE SUMMARY OF FINDINGS
AND RECOMMENDATIONS**





A. Introduction

The Town of Carrboro, North Carolina (“Town”) Disparity Study (“Study”) will analyze contracting opportunities funded by the Town to determine whether a disparity exists between the percentage of available Minority- and Women-owned business enterprises (sometimes referred to as “MBE” or “WBE” respectively or collectively, “M/WBE”) within the market and the percentage of dollars spent with these firms utilized by the Town in its procurement process.

The Study collected and analyzed relevant data on business in the Industry Categories of:

1. Construction
2. Architecture & Engineering (“A&E”)
3. Professional Services
4. Other Services
5. Goods

The Study Period for the Disparity Study was determined as the five (5) year period from July 1, 2017, through June 30, 2022 (FY2018-FY2022).



B. Study Objectives

The principal questions of this Study were:

1. Is there a statistically significant disparity within the Relevant Geographic Market between the percentage of certified Minority- and Women-owned businesses willing and able to provide goods or services to the Town in each of the categories of contracts and the percentage of dollars spent by the Town or Town contractors with such firms?
2. If a statistically significant disparity exists, have factors other than race and gender been ruled out as the cause of the disparity?
3. Can the disparity be adequately remedied with race- and gender-neutral remedies?
4. If race- and gender-neutral remedies are not sufficient, does the evidence from the Study legally support race- and/or gender-conscious remedial program elements?
5. Are the proposed remedies narrowly tailored to the findings of the Study?

C. Technical Approach

In conducting this Study and preparing its recommendations, G&S followed a carefully designed work plan that allowed Study team members to fully analyze Availability, Utilization, and Disparity with regard to participation. The final work plan consisted of, but was not limited to, the following major tasks:

1. Establishing data parameters and finalizing a work plan;
2. Legal analysis;
3. Reviewing policy and procurement processes;
4. Collecting electronic data, inputting manual data, organizing and cleaning data, and filling any data gaps;
5. Conducting geographic and product market area analyses;
6. Conducting Utilization analyses;
7. Determining the Availability of qualified firms;
8. Analyzing the Utilization and Availability data for disparity and statistical significance;
9. Conducting private sector analysis including credit and self-employment analysis;
10. Collecting and analyzing anecdotal evidence;
11. Establishing findings of fact regarding the existence and nature of marketplace discrimination and/or other barriers to minority- and women-owned business participation in the Town's contracts; and
12. Preparing a final report that identifies and assesses the efficacy of various race- and gender-neutral and narrowly tailored race- and gender-based remedies if indicated by the findings.



D. General Legal Consideration for Disparity Studies

Governmental entities across the country authorize disparity studies in response to *City of Richmond v. J.A. Croson Co.*, 488 U.S. 469 (1989), and subsequent federal case decisions in order to determine whether there is a sufficient factual predicate for the creation or continuation of a remedial procurement program based upon race, gender, and ethnicity. Among the legal requirements of *Croson* and its progeny for implementing race/ethnicity or gender-based policies is a determination that the Town has been a passive or an active participant in identified discrimination, which may be shown through direct evidence or can be inferred based on quantitative findings (which may also be supplemented with or informed by anecdotal data).

As the detailed findings below will demonstrate, G&S found that the Town had underutilization of Minority Business Enterprises (“MBE”) and/or Woman Business Enterprises (“WBE”) in several of the Industry Categories studied, which establishes the factual predicate necessary to support race- and gender- conscious remedies along with more robust race- and gender-neutral efforts. Because the disparities found are specific both as to minority category (i.e., race, ethnicity, gender) and as to industry category, the remedies considered as a result of this Study can be narrowly tailored to address the specific disparities found, which is also required under the case law.

G&S also conducted a regression analysis as part of the Study which indicated that the identified disparities remained even after controlling for possible causative factors other than race, ethnicity, or gender status of the firm owners. These findings were often consistent with anecdotal evidence of the experiences of firms in the Town’s marketplace as well as in the policy, practices, and procedures findings.



E. Findings

1. Policy Findings

FINDING 1: PROCUREMENT STAFFING

By Town Code, the Town Manager is designated as the primary purchasing agent, but the duties have been delegated to a Purchasing Officer/Agent (as permitted). Accordingly, procurement of goods and services with the Town of Carrboro is centered with the Procurement Coordinator (in the Finance Department), with oversight by the Town Manager and the Town Council.

The Procurement Coordinator is a single employee/officer, and there is no staff specifically assigned to encourage M/WBE participation through outreach or otherwise.

FINDING 2: INFORMAL & FORMAL PROCUREMENT

For smaller purchases, Carrboro procurement is more decentralized to allow flexibility for the buying departments. The Purchasing Office plays the central role in formal procurement, however, with some approval and contract execution responsibilities designated to the Town Manager and the Town Council.

FINDING 3: PURCHASING POLICY MANUAL

The Town has produced a comprehensive purchasing policy manual, which notably also includes a non-discrimination provision and commitment to equitable/fair competition in procurement.

FINDING 4: VENDOR INFORMATION

The Finance Department keeps an updated list of vendors that are doing business with the Town. The Purchasing Office serves as a liaison between vendors and the various user departments, providing departments with useful information obtained from or about vendors or potential vendors.

FINDING 5: BEST VALUE

The Town is committed to “Best Value” procurement by Code: “The Department’s objective is to acquire the product or services meeting the needs of the end user while ensuring that the procurement achieves: (1) Compliance with the specification and departmental needs; and (2) ‘Best Value.’”



FINDING 6: INFORMAL PROCUREMENT PROCESS & NONCOMPETITIVE BIDS

During the Study Period, an informal procurement process was used by the Town for purchases of goods and non-professional services costing between \$500¹ and \$89,999, and for Construction contracts under \$300,000.

Non-competitive informal bids are obtained for purchases between \$500/\$1,000 and \$4,999.99 (with solicitation of at least one quote); purchases between \$5,000 and \$29,999.99 require three (3) price quotes to be solicited and submitted by the user department. Small purchases, those under \$500/\$1,000, could be made directly by a Town department without the need for bids or a requisition by using P-Cards (Purchasing Cards).

FINDING 7: COMPETITIVE INFORMAL BIDS

Competitive informal bidding is required for purchases of supplies, materials, equipment, and non-professional services valued at \$30,000 or more but less than \$90,000, and for construction or building repair contracts valued at \$30,000 or more but less than \$300,000.

FINDING 8: FORMAL PROCUREMENT FOR CONSTRUCTION

Formal procurement/competitive bidding is required for Construction projects valued over \$300,000 and purchases of goods (supplies, equipment, etc.) and services valued at more than \$90,000, consistent with the Town policy and State law. At least three (3) bids are required for construction contracts.

FINDING 9: EXEMPTIONS

The Town exempts purchases off of state contracts and contracts formally bid by other municipalities, counties, or other governmental entities in the state.

FINDING 10: QUALIFICATION-BASED AWARDS

Contracts for construction-related professional services in the Town of Carrboro are bid for and evaluated against applicable State law (N.C.G.S. § 143-64.31, the Mini-Brooks Act). These are qualifications-based awards; specifically, selection is made based on “demonstrated competence and qualification for the type of professional services rendered.”



Non-construction professional services procured by the Town also use qualifications-based evaluation/award, as provided in the Purchasing Policy. Interviews indicated that the Town does not generally prequalify firms for professional services opportunities.

FINDING 11: BONDING

The Town's Purchasing Policy provides that performance and payment bonds for 100% of the contract value are required when a construction contract exceeds \$50,000 on an overall project that exceeds \$300,000. This is consistent with North Carolina law, which requires performance and payment bonds for construction contracts worth more than \$50,000 that are part of a larger project that is worth more than \$300,000. Performance and payment bonds are also required under State law for construction and repair contracts over \$300,000, but not for purchase contracts.

Bid bonds are required on contracts for construction or repair work in excess of \$300,000. State law requires bid bonds of 5% of the bid price for formal construction and repair contracts, but not for purchase (supplies/goods) contracts. Each of these bonds can be waived by the Purchasing Office. In the G&S Survey of Business Owners ("Survey"), 16.2% of respondents selected performance bond requirements and 15.7% selected bid bond requirements as barriers preventing them from bidding or obtaining work for the Town of Carrboro.

FINDING 12: INSURANCE

Insurance requirements for Town contracts are set forth in the standard contract templates approved by the Town Attorney (minimum coverage of \$1 million for General Liability coverage and for Products and Completed Operations coverage). In the G&S Survey of Business Owners ("Survey"), 4.7% of respondents cited insurance requirements as a barrier preventing them from bidding or obtaining work for the Town of Carrboro.

FINDING 13: CONSTRUCTION M/WBE GOAL

Consistent with North Carolina State Statute §143-128, the Town of Carrboro has established a 10% M/WBE goal for construction projects valued at or above \$500,000. Also, when a construction project is valued at \$300,000 or more and is solicited for single-prime bidding, separate-prime bidding, CMAR, or other alternative contracting methods, the Town attaches a 10% M/WBE goal to such projects. M/WBE goals are not set on Town contracts or projects outside of construction.



FINDING 14: OUTREACH PLAN & ASPIRATIONAL M/WBE GOALS

The Town of Carrboro has implemented the “Outreach Plan and Guidelines for Recruitment and Selection of Minority Businesses for Participation in Town Building Construction Contracts,” which references the State 10% goal. The Outreach Plan provides bidders and the Town’s administration with detailed requirements for outreach, utilization, documentation, and Good Faith Efforts (GFEs) toward M/WBE participation in Town contracts/projects.

The M/WBE goals are essentially aspirational with the Town, however, as bids are not rejected for lack of goal achievement and there is no meaningful contract compliance that tracks utilization throughout the project.

FINDING 15: CERTIFICATION

The Town does not certify M/WBE firms but accepts certifications from the North Carolina Historically Underutilized Business (HUB) Program, certifications from North Carolina DOT (DBE and M/WBE), the Small Business Administration (SBA) 8(a) Program, and will consider certifications from other governmental entities on a case-by-case basis.

FINDING 16: PARTNERSHIPS

Through various informal partnerships, the Town provides small businesses and start-ups with resources and information on a race- and gender-neutral basis. These programs are housed in the Economic Development Office.

- Entrepreneurship & Small Business Guidance and Training
- The New Business Resource Center (website includes links and assistance for various stages of business development)
- The Revolving Loan Program intended to assist small businesses (including M/WBE firms)

FINDING 17: LOCAL INITIATIVE

In its Purchasing Policy, the Town of Carrboro also outlines its efforts to expand the participation of local firms in Town procurement (a “Local initiative”). This is an additional race and gender-neutral procurement policy.



2. *Quantitative Analysis Findings*

FINDING 18: RELEVANT GEOGRAPHIC MARKET

The Study compared the Availability and Utilization of firms in a common area, the Relevant Geographic Market, which is the geographic firm location where the Town spends at least 75% of its payments. The Relevant Geographic Market area was determined to be the ten-county area around Carrboro², based on the following percentages of spending.

- In Construction, 83.70%
- In A&E, 89.04%
- In Professional Services, 92.75%
- In Other Services, 75.01%
- In Goods, 47.01%
- In Total, 84.05%

Given that 84.05% of all the Town of Carrboro spending was with firms located in this Relevant Geographic Market, G&S determined that one consistent Relevant Geographic Market across all Industry Categories was appropriate.

FINDING 19: AVAILABILITY

The measures of Availability utilized in this Study incorporate all the criteria of Availability required by City of Richmond v. J.A. Croson Co., 488 U.S. 469 (1989).

- The firm does business within an industry group from which Town of Carrboro makes certain purchases.
- The firm's owner has taken steps to demonstrate interest in doing business with the government.
- The firm is located within the Relevant Geographic Market such that it can do business with the Town.



The firms used to calculate Availability came from the Master Vendor File in the Relevant Geographic Market Area. G&S found that firms were available to provide goods and services to the Town as reflected in the following percentages by each race, ethnicity, and gender group (Table 1).

Table 1: Availability Estimates by Work Category
In the Relevant Geographic Market
(Based upon the Master Vendor File)
Town of Carrboro Disparity Study

Business Owner Classification	Construction	A&E	Professional Services	Other Services	Goods
African American	17.07%	10.31%	15.36%	11.37%	6.46%
Asian American	0.99%	4.67%	1.84%	0.70%	0.92%
Hispanic American	4.51%	3.54%	0.67%	0.86%	0.56%
Native American	0.45%	0.64%	0.36%	0.24%	0.08%
TOTAL MINORITY	23.03%	19.16%	18.23%	13.16%	8.01%
Non-Minority Woman	9.80%	13.20%	4.86%	3.50%	5.18%
TOTAL MWBE	32.82%	32.37%	23.09%	16.66%	13.19%
Non-MWBE	67.18%	67.63%	76.91%	83.34%	86.81%
TOTAL	100.00%	100.00%	100.00%	100.00%	100.00%

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FINDING 20: M/WBE PRIME UTILIZATION

As Table 2 below shows, the Town of Carrboro paid a total of \$8.14 million in prime construction spending in the Relevant Geographic Market during the Study Period and \$1.43 million of this amount, or 17.59% was paid to M/WBE firms as prime contractors. M/WBEs were paid 13.12% of A&E, 0.24% of Professional Services, 7.83% of Other Services, and 2.67% of Goods. M/WBEs received 10.50% of prime payments across all purchasing categories (\$2.41 million).



Table 2: Summary of Prime Utilization by Work Category
In the Relevant Geographic Market
(Based upon Payments FY 2018-2022)
Town of Carrboro Disparity Study

Business Ownership Classification	Construction	Architecture and Engineering	Professional Service	Other Services	Goods	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 70,632	\$ -	\$ 4,000	\$ 1,100	\$ 484	\$ 76,216
Asian American	\$ -	\$ -	\$ -	\$ 256,048	\$ 16,758	\$ 272,806
Hispanic American	\$ 101,156	\$ 191,415	\$ -	\$ 73,809	\$ -	\$ 366,381
American Indian	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
TOTAL MINORITY	\$ 171,788	\$ 191,415	\$ 4,000	\$ 330,957	\$ 17,242	\$ 715,403
Non-Minority Woman	\$ 1,260,681	\$ 311,571	\$ -	\$ 7,610	\$ 117,132	\$ 1,696,995
TOTAL MWBE	\$ 1,432,470	\$ 502,986	\$ 4,000	\$ 338,567	\$ 134,375	\$ 2,412,398
Non-MWBE	\$ 6,710,053	\$ 3,331,092	\$ 1,633,673	\$ 3,983,761	\$ 4,895,274	\$ 20,553,852
TOTAL FIRMS	\$ 8,142,522	\$ 3,834,078	\$ 1,637,673	\$ 4,322,328	\$ 5,029,649	\$ 22,966,250
Business Ownership Classification	Construction	Architecture and Engineering	Professional Service	Other Services	Goods	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	0.87%	0.00%	0.24%	0.03%	0.01%	0.33%
Asian American	0.00%	0.00%	0.00%	5.92%	0.33%	1.19%
Hispanic American	1.24%	4.99%	0.00%	1.71%	0.00%	1.60%
American Indian	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	2.11%	4.99%	0.24%	7.66%	0.34%	3.12%
Non-Minority Woman	15.48%	8.13%	0.00%	0.18%	2.33%	7.39%
TOTAL MWBE	17.59%	13.12%	0.24%	7.83%	2.67%	10.50%
Non-MWBE	82.41%	86.88%	99.76%	92.17%	97.33%	89.50%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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FINDING 21: M/WBE SUBCONTRACTOR UTILIZATION

The Town of Carrboro does not track subcontracting dollars across all projects. Consequently, G&S conducted a Prime Vendor Questionnaire. The survey results were quite limited, resulting in only \$182,017 in reported subcontract dollars despite G&S conducting a telephone campaign to request that prime contractors provide payment information about their subcontractors. Of those reported subcontracting dollars, 76.85% were in A&E and most of those dollars went to firms owned by Non-Minority Woman (75.81%). Overall M/WBEs



received 90.06% of reported subcontract dollars. Because of this limited subcontract data no disparity analysis was reported for subcontracting and there were no reported subcontracting dollars in Professional Services or Goods.

FINDING 22: SUMMARY OF DISPARITY ANALYSIS FOR FY2018-FY2022

Table 3 below indicates those M/WBE groups where a statistically significant disparity (X) was found in Prime Utilization for Construction, A&E, Professional Services, Other Services, or Goods. There was Underutilization in prime contracts for all available M/WBE groups, except

- Non-Minority Women owned firms in Construction
- Asian American owned firms in Other Services
- Hispanic American Owned firms in A&E and Other Services.

G&S also conducted a Disparity Analysis for contracts under \$500,000 and under \$1 million. There was Underutilization in prime contracts for all available M/WBE groups, except

For contracts under \$500,000:

- Non-Minority Women owned firms in A&E and Goods
- Asian American owned firms in Other Services and Goods
- Hispanic American Owned firms in Construction, A&E and Other Services.

For contracts under \$1 million:

- Non-Minority Women owned firms in A&E and Goods
- Asian American owned firms in Other Services and Goods
- Hispanic American Owned firms in A&E and Other Services.
- In Construction, Hispanic American owned firms were in Parity



Table 3: Summary of Statistically Significant Underutilization of M/WBEs in Prime Contracting
Town of Carrboro Disparity Study

Business Owner Classification	Construction	A&E	Professional Service	Other Services	Goods
African American	X	X	X	X	X
Asian American	X	X	X		X
Hispanic American	X		X		X
American Indian	X	X	X	X	X
Non-Minority Woman		X	X	X	X

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3. Marketplace Contracting Disparities Analysis Findings

FINDING 23: M/WBE FIRMS HAVE SMALLER REVENUE SHARE

For the Town of Carrboro relative to White American owned firms, the estimated revenue shares of each M/WBE owned firm never exceeds 7.6% (all Women). All M/WBEs have estimated revenue shares far smaller than their firm representation shares. Relative to firms owned by White Americans in the Town of Carrboro Market Area³, the MBE revenue shares exclusive of Women owned firms—some of whom are White American—are well below their total implied 18% (approximately) of firm representation shares. This is consistent with and suggestive of, but not necessarily causal evidence for, M/WBEs facing discriminatory barriers in the private sector of the Town of Carrboro Market Area.

Lower revenues for M/WBEs in the Town of Carrboro Market Area are suggestive, but do not necessarily prove, the existence of private discrimination that undermines their capacity to compete with Non-M/WBEs for public contracting opportunities. This could motivate private discrimination justification for Affirmative Action in Town procurement policies.



Otherwise this is potentially a passive participant in private discrimination against M/WBEs firms with respect to its procurement practices.

FINDING 24: AFRICAN AMERICAN AND PACIFIC ISLANDER HOUSEHOLDS ARE LESS LIKELY TO BE SELF-EMPLOYED

Relative to White Americans, African Americans and Pacific Islanders are less likely to be self-employed. This suggests that these types of firms face barriers to self-employment in the Town of Carrboro Market Area. The lower self-employment could reflect disparities in public contracting as there is research evidence that the self-employment rate of African Americans is increasing with respect to the provisioning and establishment of M/WBE public procurement programs. (Source: G&S Survey of Business Owners)

FINDING 25: AFRICAN AMERICAN, AMERICAN INDIAN, PACIFIC ISLANDER, AND WOMEN HOUSEHOLDS ARE LESS LIKELY TO BE SELF EMPLOYED IN CONSTRUCTION

Relative to firms owned by White Americans, African Americans, American Indians, Pacific Islanders, and Women are less likely to be self-employed in the Town of Carrboro Market Area Construction sector. This suggests that these firms face barriers to self-employment in the Town of Carrboro Market Area construction sector. The lower likelihood could reflect disparities in public contracting, as there is research evidence that the self-employment rate of African Americans in construction is increasing with respect to the provisioning and establishment of M/WBE public construction procurement programs. (Source: G&S Survey of Business Owners)

FINDING 26: M/WBE BUILDING PERMIT SHARES LOWER RELATIVE TO NON-M/WBE

Non-M/WBEs accounted for approximately 98% of building permits in the Town of Carrboro. To the extent that experience acquired by participating in the private sector translates into an enhanced capacity to compete in the market for public sector contracts and subcontracts, the almost complete dominance of Non-M/WBEs in securing building permits suggests the presence of private sector barriers faced by M/WBEs. In this context, if there are any public contracting/subcontracting disparities between M/WBEs and Non-M/WBEs in the Town of Carrboro, it could constitute passive discrimination against M/WBEs, as the disparities could reflect barriers, possibly discriminatory, that M/WBEs face in the private sector that serve to undermine their capacity to compete for contracts and subcontracts with the Town of Carrboro. (Source: G&S Survey of Business Owners)



FINDING 27: AFRICAN AMERICAN, HISPANIC AMERICAN, AND BI/MULTIRACIAL AMERICAN OWNED BUSINESSES REPORTED TO HAVE MORE BUSINESS LOAN DENIALS

Relative to Non-M/WBEs, firms owned by African Americans, Hispanic American, and Bi/Multiracial Americans are more likely to have been denied commercial bank loans. This suggests that in the Town of Carrboro any public procurement disparities between M/WBEs and firms owned by African Americans, Hispanic American, and Bi/Multiracial Americans can be explained, at least in part, by differential access to private credit (e.g., race-based credit market discrimination) that enables financing a capacity for success in public procurement. (G&S Survey of Business Owners)

FINDING 28: AFRICAN AMERICAN, ASIAN AMERICAN, AND BI/MULTIRACIAL AMERICAN FIRMS ARE MORE LIKELY TO BE NEW FIRMS

Relative to firms owned by Whites, firms owned by African Americans, Asian Americans, and Bi/Multiracial Americans are more likely to be new firms. This suggests that any public contracting disparities between Non-M/WBEs and firms owned by these types of M/WBEs can possibly be explained by differential rates of market experience. (G&S Survey of Business Owners)

FINDING 29: WBEs MORE LIKELY TO SUBMIT PRIME BIDS

Relative to Non-M/WBEs, firms owned by Women are more likely to submit prime bids. This suggests that any disparities in public procurement outcomes between firms owned by Women and Non-M/WBEs in the Town of Carrboro cannot possibly be explained by the relatively lower prime bid submissions rates of firms owned by women. (G&S Survey of Business Owners)

FINDING 30: AFRICAN AMERICAN AND OTHER RACE FIRMS LESS LIKELY TO WIN PRIME CONTRACT AWARDS

Relative to Non-M/WBEs, firms owned by African Americans and Other Race are less likely to win a prime contract award from the Town of Carrboro. This suggests that at least for these types of M/WBEs, there are contracting award disparities between them and Non-M/WBEs. (G&S Survey of Business Owners)

FINDING 31: AFRICAN AMERICAN, BI/MULTIRACIAL, AND OTHER RACE FIRMS LESS LIKELY TO WIN SUBCONTRACT AWARDS

Relative to Non-M/WBEs, firms owned by African Americans, Bi/Multiracial, and Other Race are less



likely to win a subcontract award from the Town of Carrboro. This suggests that, at least for these types of M/WBEs, any disparities between them and Non-M/WBEs in public contracting awards can be explained, at least in part, by differential experiences acquired through subcontracting. (G&S Survey of Business Owners)

FINDING 32: HUBs AND MBE OWNED FIRMS MORE LIKELY TO HAVE NEVER BEEN A PRIME OR SUB WITH THE TOWN

Relative to Non-M/WBEs, firms certified as Historically Underutilized Businesses, and those identified as owned by African Americans, Hispanic Americans, Asian Americans, and American Indians are more likely to have “never” been a prime contractor or subcontractor with the Town of Carrboro. To the extent that success in public contracting is proportional to having prior prime contracts or subcontracts, this suggests that any contracting disparities between these types of M/WBEs and Non-M/WBEs can possibly be explained by their relative disadvantage in having secured prior prime contracts or subcontracts from the Town of Carrboro. (G&S Survey of Business Owners)

FINDING 33: AFRICAN AMERICAN, ASIAN AMERICAN, AMERICAN INDIAN, AND WOMEN MORE LIKELY TO EXPERIENCE DISCRIMINATION IN PRIVATE SECTOR

Relative to Non-M/WBEs, firms owned by African Americans, Asian Americans, American Indians, and Women are more likely to experience discrimination in the private sector of the Carrboro, NC, Market Area. To the extent that private sector discrimination can undermine the capacity of M/WBEs to compete for public sector procurement, this suggests that private sector discrimination may explain, at least in part, public contracting disparities between these types of M/WBEs and Non-M/WBEs. (G&S Survey of Business Owners)

FINDING 34: AFRICAN AMERICAN, ASIAN AMERICAN, AMERICAN INDIAN, BI/MULTIRACIAL AND OTHER RACE MORE LIKELY TO EXPERIENCE DISCRIMINATION AT THE TOWN OF CARRBORO

Relative to Non-M/WBEs, firms certified as Minority-owned, and those owned by African Americans, Asian Americans, American Indians, Bi/Multiracial, and Other Race are more likely to experience discrimination by the Town of Carrboro. To the extent that discrimination in the Town of Carrboro can undermine the capacity of M/WBEs to compete for public sector procurement, this suggests that discrimination at the Town of Carrboro, NC, may explain, at least in part, public contracting disparities between Non-M/WBEs and Non-M/WBEs. (G&S Survey of Business Owners)



FINDING 35: INFORMAL NETWORKS

Relative to Non-M/WBEs, firms certified as Minority-owned, Historically Underutilized, Woman-owned, and those owned by African Americans and, Bi/Multiracial, are more likely to agree informal networks are important for public contracting success with the Town of Carrboro. This suggests that, at least for these types of M/WBEs, contracting disparities between them and Non-M/WBEs can explained, at least in part, by their exclusion from Town of Carrboro public contracting networks that reduces their ability to secure prime contracts and subcontracts. (G&S Survey of Business Owners)

FINDING 36: M/WBE PARTICIPATION REQUIREMENTS

Relative to Non-M/WBEs, firms certified as Minority-owned, and those owned by African Americans, American Indians, and Bi/Multiracial are more likely to agree that Non-M/WBE prime contractor firms only use M/WBEs when required to in the Town of Carrboro. This suggests that, at least for these types of M/WBEs, contracting disparities between them and Non-M/WBEs can explained, at least in part, by the lack of enforcing M/WBE participation requirements on the Town of Carrboro public contracting awards to Non-M/WBEs. (G&S Survey of Business Owners)

4. Anecdotal Findings

FINDING 37: LACK OF PARTICIPATION

G&S experienced challenges gathering anecdotal evidence for this Study. Despite extensive efforts to connect with the Town’s business community, providing longer-than-normal public response periods, making direct phone calls to firms seeking involvement, adding an additional public input session, and placing multiple advertisements on LinkedIn, participation in this Study remained limited. Focus groups and public input sessions were also poorly attended. Given Finding 38, this may be indicative of an apathetic business community, or a business community that may not support the efforts of the Town.

FINDING 38: PERCEPTION THAT TOWN IS NOT BUSINESS FRIENDLY

A business organization leader stated that while the Town purports to welcome businesses, the actions of its officials do not reflect an inviting atmosphere. The leader stated, “I don’t think they (the Town) are as welcoming as they would like to be thought of as.” A business owner said a Town leader threatened to give her company unfavorable reporting after he unexpectedly canceled a project. Then, he got upset when she was unable to disengage from other ongoing work to restart his project on short notice.



FINDING 39: LIMITED COMMUNICATION AND OUTREACH

Nearly 83% of those surveyed for the Study said they have never received notification from the Town regarding bid opportunities. Among those who did not receive notification were 97% of Woman owned firm respondents and 78% of African American owned companies who responded. “I see RFPs and bids for most of the towns once you’re certified,” a business owner participating in the Study said. “But I don’t think thus far I’ve seen anything for Carrboro. We do IT and wellness, and I don’t think in the last couple of years I’ve seen anything from Carrboro out for bid.

While 88% of respondents were unable to provide an answer in the affirmative or negative, 7.3% said Town procurement staff were either “never” responsive or helpful with questions about bidding and 2.1% said the Town was “seldom” responsive or helpful. African American owned businesses responded to this question at a rate of 12%, with 9% responding in the “never” column, and 3% answering to “seldom.”

FINDING 40: REGISTRATION

79.6% of businesses surveyed acknowledged not being registered to do business with the Town, including 85.7% of Woman owned businesses, 75% of African American owned firms, and 70.6% of Non-M/WBE owned companies. In comparison, only 15.7% of respondents said they were not registered to do business with any other government entity, including, but not limited to the North Carolina Department of Transportation, the State of North Carolina, Chatham County, Durham County, and the Town of Chapel Hill. 23.5% of Non-M/WBE owned businesses, 15% of African American owned companies, and 11.9% of Woman owned firms said they were not registered to do businesses with those other government agencies.

Of those respondents who claimed not to be registered to do business with the Town of Carrboro, 29.6% responded that did not know how to register. From that same pool of survey participants, 63.2% said they did not know that there was a registry. “I was taken aback to discover that I could register with Carrboro,” one Study focus group participant said.

FINDING 41: PROCUREMENT PROCESS

25.1% of the business owners polled for the Study stated that limited knowledge of purchasing or contracting policies and procedures prevented them from bidding on or obtaining work on a Town



project. That includes 29% of African American owned businesses and 23.8% of Woman owned firms. A business owner told G&S that Town staff were not responsive. “We have encountered difficulties in finding knowledgeable individuals who understand our business and can provide guidance on identifying relevant opportunities,” she said. “This lack of tailored support hinders our ability to explore potential avenues for growth and funding.”

FINDING 42: BIDS AND AWARDS

According to the G&S Survey of Business Owners, 83.2% of the participants said their company had never submitted a bid as a prime contractor for a Town of Carrboro project. That includes 84% of African American owned businesses, 82.4% of Non-M/WBE owned firms, and 78.6% of Woman owned companies. Comparatively, only 59.2% said they had not bid on prime work in the private sector and 55.5% with other public sector entities.

86.9% of survey respondents said they had never been awarded prime vendor contracts for Town of Carrboro public contracts, versus 62.8% who had not won prime bids in the private sector and 68.1% who never won awards as prime contractors with other public sector entities. 92.1% of respondents said they had never worked as a subcontractor in the Town of Carrboro, including 96% of African American owned businesses, 90.5% of Woman owned firms, and 64.7% of Non-M/WBE owned companies.

FINDING 43: LIMITED ACCESS TO CAPITAL

19.4% of respondents said they were denied a commercial or business bank loan between one (1) and ten (10) times from July 1, 2017, and June 30. That includes 28% of African American owned firms and 14.3% of Woman owned businesses. One business participating in the Study suggested that there be programs to help HUB certified businesses get loans. “How does one get collateral without money and how can you get money without work?” he asked.

FINDING 44: BONDING REQUIREMENTS

In the G&S Survey of Business Owners, 16.2% of respondents selected performance bond requirements and 15.7% selected bid bond requirements as barriers preventing them from bidding or obtaining work for the Town of Carrboro.



FINDING 45: ISSUES WITH PROMPT PAYMENT

In the Survey of Business Owners, 25 out of 191 survey respondents indicated that they were paid by the Town for a project. Although small in number, it is notable and commendable that none of the respondents indicated payments made to them over 60 days.

In comparison, with regard to payments as subcontractors, 3 respondents of the 25 who responded to the question marked that payments from prime contractors on Town of Carrboro projects were received between 61-90 days from the time of invoicing. This may indicate remedies necessary at this secondary level to ensure that subcontractors are being paid as quickly as primes and highlight the disparity between the narrative and survey responses to this question. One business owner participating in the Study said she had prompt payment challenges caused by project timeline delays due to the prime contractor being late. She said her payments from the prime typically take 60 to 120 days and pointed to an instance in which it took a year to receive payment from the prime contractor.

FINDING 46: UNFAIR COMPETITION WITH LARGER COMPANIES

According to the G&S Survey of Business Owners, 28.7% of the participants said that they saw unfair competition with large companies as a barrier to doing business. That includes 29% of African American owned businesses, 23.8% of Woman owned firms, and 11.8% of Non-M/WBE owned companies. A business owner contributing to the Study said that large firms control pricing. “Larger companies often outbid smaller minority companies,” she said.

FINDING 47: INFORMAL NETWORKS

86.9% of respondents stated that they “do not know” if there is an informal network of contractors doing business with the Town of Carrboro, but 10.5% responded “yes” to an informal network of contractors monopolizing the public contracting process.

71.5% of respondents stated that they “neither agree or disagree” with exclusion from an informal network impacting their ability to win contracts with the Town, but 17.2% answered “strongly agree” and “agree” to this statement.



5. *Legal Finding*

During the Study Period, the Town of Carrboro implemented the State’s race- and gender-conscious goal provisions for Construction contracts, and implemented race- and gender-neutral measures to try to increase utilization of M/WBE firms in Town purchasing, but the completed Study shows that those efforts were not effective in avoiding or resolving the disparities identified in the Study⁴. Accordingly, the Town has a basis to introduce more robust race- and gender-neutral remedies. The Town also has a legal basis, under applicable law, to continue and/or introduce narrowly tailored race and gender-conscious remedies toward the goal of eliminating the identified disparities.⁵

The results of the regression analysis and the evaluation of the contracting environment in the private sector as part of this Study demonstrate that factors other than M/WBE status cannot fully account for the statistical disparities found. Stated otherwise, the Town of Carrboro can show that M/WBE status continues to have an adverse impact on a firm’s ability to secure contracting opportunities with it, further supporting more aggressive remedial efforts.

Lastly, having obtained statistical and anecdotal evidence of disparities that are race, ethnicity, and gender specific for each of the studied industry categories, the Town can ensure that the more robust remedies considered as a result of this Study can be limited to minority groups for which statistically significant underutilization has been identified in a particular industry category—that is, they are narrowly tailored to address the specific disparities found.⁶

F. *Commendations*

COMMENDATION 1: TRAINING PARTNERSHIP

Since the Study Period, the Town began a partnership with a training facility for M/WBE firms, called “EMPOWERment, Inc.” Interviews indicate that among the activities of the facility are business “pop-up” markets for minority entrepreneurs and firms to introduce themselves and their products/services to public and private buyers. The program is not limited to firms seeking to do business with the Town.

COMMENDATION 2: BUSINESS ASSISTANCE PROGRAMS THROUGH ECONOMIC DEVELOPMENT

G&S commends the Town for providing small businesses and start-ups with resources and information on a race- and gender-neutral basis. These programs are housed in the Economic Development Office.



- Entrepreneurship & Small Business Guidance and Training
- The New Business Resource Center (website includes links and assistance for various stages of business development)
- The Revolving Loan Program is intended to assist small businesses (including M/WBE firms)

COMMENDATION 3: TARGETED BID ADVERTISEMENT

Staff interviews revealed that the Town advertises bids in a publication specifically targeting minority communities.

COMMENDATION 4: RACIAL EQUITY COMMISSION

The Town has established by legislation a Racial Equity Commission, consisting of twelve (12) Town residents appointed by the Town Council. The purpose of the Commission is “to advise and work with the Town Council, Chief Race and Equity Officer, and Town staff to educate, provide leadership, and facilitate on-going equitable engagement within the immediate and greater Carrboro community toward the goal of creating a community of inclusiveness in which political, economic, social, and cultural institutions are no longer predicated and influenced by race.”

COMMENDATION 5: PROMPT PAYMENT TO PRIMES

Of the twenty-five respondents to the Survey of Business Owners that indicated that they were paid by the Town for a project, it is commendable that none of the respondents indicated payments made to them over 60 days.

COMMENDATION 6: OUTREACH PLAN

The Town of Carrboro’s “Outreach Plan and Guidelines for Recruitment and Selection of Minority Businesses for Participation in Town Building Construction Contracts,” which provides bidders and Town administration with an outline of requirements for outreach, utilization, documentation, and Good Faith Efforts (GFEs) toward M/WBE participation in Town contracts/projects.

COMMENDATION 7: COMPREHENSIVE PURCHASING POLICY

G&S commends the Town for having a comprehensive purchasing policy that provides clear instructions on its purchasing processes. Even large agencies do not often have such a comprehensive document.



COMMENDATION 8: BOND WAIVER

G&S commends the Town on having a policy that, when indicated, bonds may be waived by the Purchasing Officer.

G. Recommendations

G&S makes the following recommendations to assist the Town in remedying the disparities found to ensure that all available firms within the Relevant Geographic Market are given every chance to succeed in business with the Town.

RECOMMENDATION 1: EVALUATE NEED FOR ADDITIONAL STAFFING AND RESOURCES

G&S's recommendations represent a possible need for increased resources and staffing. Prior to undertaking these recommendations, the Town should consider whether there is a need to allocate additional resources and potentially additional staffing. G&S is aware that additional funding would be dependent on the budgeting process and recommends that the Town have a part-time staff member who is focused on M/WBE procurement/program, especially considering that the state requires at least a part time M/WBE coordinator. The Town of Carrboro can utilize the time period before additional resources are approved and applied to:

- Accept the Study and its Recommendations;
- Plan for Implementation (Steps, Phases and Tasks);
- Determine Budget and Staffing Needs for New Policy Elements; and
- Develop a Training Protocol and Train any additional staff

RECOMMENDATION 2: INCLUDE A COMMERCIAL NON-DISCRIMINATION POLICY IN ALL VENDOR CONTRACTS

G&S is aware that the Town currently has a non-discrimination policy in employment. G&S recommends having a detailed commercial non-discrimination policy. This is important for the Town because this policy provides authority to talk to vendors about utilizing M/WBEs. There is an obligation by the Town to make sure that it is not passively participating in the active discrimination/exclusionary actions of the prime contractor that it uses.



RECOMMENDATION 3: CREATE ELECTRONIC VENDOR DATABASE

While G&S is aware that the Town has vendor application forms that can be found on their website, it recommends that the Town establish an online vendor registration system that allows for the creation of a vendor database that is easily accessible so that the Town can notify and build relationships with vendors.

As evidenced in many comments from anecdotal data collection, there is a perception by the business community of a disconnect between the Town and vendors. There was also the perception that the Town was not business friendly. Building a vendor database allows the Town to build relationships with vendors which can help provide the perception of being welcoming to vendors.

RECOMMENDATION 4: SET ANNUAL M/WBE BENCHMARKS

Availability is the benchmark for attainment of M/WBE participation. Using all the remedial efforts, both for prime contractors and subcontractors, annual benchmarks are an internal measure for the Town to determine if the participation of firms in each M/WBE group is what should be expected based upon their Availability in the Relevant Geographic Market. G&S will work with the Town to set the annual goals for the first year and a formula for succeeding years.

RECOMMENDATION 5: ALIGN ASPIRATIONAL M/WBE GOALS TO DISPARITY STUDY AVAILABILITY

The Town should not use a one-size-fits-all goal for each contract but should adjust aspirational goals as appropriate on a contract-by-contract basis. In addition, contract goals should be set separately for MBEs and WBEs based upon the various scopes of work under that contract. Because of its current limited staffing, G&S recommends that the Town employ aspirational contract-by-contract goal setting in the areas of Construction and A&E to begin for large dollar contracts and then expand based on available resources. G&S does not recommend contract by contract goal setting for Goods as a matter of course because there are typically few subcontracting opportunities there. Goals are typically set by a team, including Procurement, Finance, and the user department to assist in breaking down the scope of work and identifying the availability of firms.

These contract-by-contract aspirational goals should be communicated to prime contractors in the solicitation as a request that the prime contractors aid the Town in meeting these goals. Once the prime contractor has submitted its MBE and WBE achievement, it should become part of the contract



commitment. This should be tracked by the Town to ensure the prime contractor adheres to the contractual commitment.

It is not the intention of this recommendation that a bid be rejected if a certain aspirational goal is not met, however certain failures to meet the goals may result in an investigation under the Commercial Non-Discrimination Policy.

G&S further recommends the Town draft a plan to encourage prime bidders to collaborate with M/WBEs by incorporating the following elements in prime contractor response requirements, which are not intended to be exhaustive:

- The firms the prime contractor contacted, when, and how contact was made, and the potential subcontractor's contact information;
- The outreach strategy used to meet the Contract's M/WBE achievement goals;
- The specific resources and resource contacts utilized to locate M/WBE firms for this Contract;
- the plan for building a connection with M/WBEs and developing a project team;
- the plan to strengthen business relationships;
- the methods that will be used to improve lines of communication;
- the approach(es) that will be taken to resolve disputes;
- detailed description of the supportive services and activities that will be established for business development and how the plan will be executed;
- the mentorship opportunities that will be made available and how those opportunities will be executed; and
- the efforts that will be made available for capacity building and how those efforts will be executed.

The Study team recognizes this may be cumbersome given current staffing and the elements can be implemented separately over time.



RECOMMENDATION 6: ENHANCE CONTRACT COMPLIANCE

The Town should enhance its contract compliance efforts, including robust tracking and monitoring, to make sure that prime contractors utilize firms as committed to in their bid package. The five (5) steps of Contract Compliance are:

1. **Assessment:** An initial assessment of individual firm availability and capacity for specific scopes of work.
2. **Outreach:** An on-going campaign to let the M/WBE business community know that the Town wants to do business with them and that the Town is willing to work with firms to create opportunities and assist, particularly local firms, in building capacity.
3. **Certification/Verification:** The Town should continue to encourage and assist firms in getting certified as M/WBEs through the State of North Carolina.
4. **Procurement:** All applicable solicitation packages and awarded contracts should include the M/WBE commitments as contract terms, as well as Town participation requirements, such as all firms performing commercially useful functions.
5. **Tracking and Monitoring:** It is essential that vendor performance is closely tracked and monitored. Likewise, projects should be efficiently closed out to verify that M/WBE firms are actually performing the work that they were contracted to perform. Finally, firms should be compensated in a timely manner and in the amounts committed. Monitoring vendor performance should also ensure equal and fair treatment in terms of contracts.

RECOMMENDATION 7: ENFORCE STATE PROMPT PAY PROVISION

Based on Anecdotal Finding 45, in which firms reported issues with prompt payment, particularly at the subcontractor/secondary payment level, G&S recommends that the Town enforce the State prompt pay provisions for prime contractors paying their subcontractors. Specifically, G&S recommends that the Town put this prompt pay provision in as a contract term for the prime contractors in an attempt to remedy this issue and ensure that subcontractors are being paid as quickly as primes.



RECOMMENDATION 8: SMALL BUSINESS RESERVE

Based on Anecdotal Finding 46, in which firms referred to unfair competition from larger firms, G&S recommends the race/gender neutral remedy of creating a small business reserve to help address some of the statistical disparities from the Study. To do this, the Town would find and set a threshold under which only small businesses bid against one another (e.g., all contracts under \$25,000 or \$50,000). The Town can also determine if these contracts will be set aside where only small businesses can bid on them or alternatively only small, local businesses which can boost local firm participation. There are requirements alongside this recommendation such as making sure there are at least three firms who can bid locally on this contract so that it is not going out and awarded to one firm who can bid.

RECOMMENDATION 9: ENCOURAGE USE OF M/WBES IN P-CARD AND INFORMAL QUOTES

The Town should encourage its staff to utilize M/WBE businesses when using P-cards if possible. In addition, where three (3) quotes are required for an informal bid, it should be required that at least one of those bids be solicited from an M/WBE firm, if any are available.

RECOMMENDATION 10: ENHANCE COMMUNICATIONS AND MARKETING RESOURCES

Based on Anecdotal Findings 39 and 47, in which firms discussed a lack of outreach and indicated the belief that there is an informal network that is excluding firms from obtaining projects, G&S recommends that the Town enhances its communications with firms, particularly through early forecasting in order to dispel the perception that certain firms have access to information ahead of others due to their relationships within the Town.

G&S specifically suggests the Town does the following:

- **Forecasting:** Alerting businesses to upcoming needs even before a formal bid is issued. This will allow the Town to provide supportive services well in advance of bid issuance, if needed. G&S recommends that the Town endeavors to reach out to more firms than just those that they are already familiar with to get quotes. So, where there is no formal bid, lists of the Town's upcoming needs and types of services and goods anticipated should also be made available to firms with opportunities posted.



- Knowing ahead of time what work will be presented in the coming year will give room for contract compliance to schedule networking events and encourage firms to team. It also gives more time for mandatory pre-bid conferences where potential prime contractors can meet potential subcontractors.
- **Targeted Outreach:** Along with developing a forecasting plan, identifying firms within the Relevant Geographic Market that would be eligible for projects as they emerge would aid in providing more awareness to bid opportunities for firms to do business with the Town. This will show the Town's interest in expanding its reach and will demonstrate the Town's willingness towards inclusivity.
- Establishing a Marketing Campaign to Increase Registration/Certification resources: G&S recommends that the Town explore methods that improve their registration database and that allow firms to self-identify with NAICS codes so the Town can have targeted outreach in advertising work to available firms.
- **Vendor Training:** Anecdotal evidence revealed that firms lack an understanding of the Town's purchasing policies and processes. The Town should hold seminars and training sessions to provide potential vendors with information to assist them in responding to solicitations.

RECOMMENDATION 11: DATA REFORM

G&S encountered several challenges in data collection for this Study. The Study team recommends that the Town prioritize the following data reforms to effectively track and monitor the program's recommendations:

- **Vendor System/File:** Centralizing the vendor list within the Finance Department is an effective step. However, although there are 12,263 vendors, only 116 phone numbers are currently recorded. The Town should ensure that vendor contact information, including phone numbers and email addresses, is consistently captured across datasets. Additionally, vendor certifications and, where applicable, commodity codes should be recorded in the Town's vendor lists.
- **Commodity Codes:** G&S recommends the use of standardized commodity codes, such as NIGP, NAICS, or the Town's general ledger codes, across all data sources to enhance the accuracy of data analysis. Vendor applications also allow firms to self-identify and provide a description of their work. The Town should maintain these self-identified work categories within the centralized vendor list.



- **Bids:** Bid records should be maintained in a centralized electronic database, accessible to the Town. This database would enable prompt retrieval of all bidders, bid tabs, and solicitation numbers. Suggested database fields include bid number, creation date, date appended, date closed, vendor information, address, project details, and project number. A centralized database would reduce the need for manual PDF inspections. Currently, bid tabs are kept by individual project managers; a unified system for maintaining bid tabs should be established.
- **Payments:** Payment data currently provided in Excel format often contains truncated vendor names, leading to challenges in vendor identification. The Town should maintain full vendor names in the payment dataset. Additionally, associating payments with contract and purchase order numbers would improve organization and clarity.
- **Awards/Contracts:** Centralizing contracts and awards within the Finance Department in an electronic database is beneficial. However, the contract database should also include the project or bid number, creation date, start date, end date, contract type (e.g., RFP, Federal, CO-OP), and information on vendors and subcontractors.
- **Subcontractor Data:** The Town should track the utilization of all subcontractors. Where possible, subcontractor race and gender information should be recorded, ideally through certification data if available.



END NOTES





1. The lower threshold was increased from \$500 to \$1,000 near the close of the Study Period.
2. The ten-county area is composed of Alamance County, NC; Caswell County, NC; Chatham County, NC; Durham County, NC; Granville County, NC; Orange County, NC; Person County, NC; Wake County, NC; Johnston County, NC; and Guilford County, NC.
3. For purposes of the Town of Carrboro Marketplace Contracting Disparities Analysis, publicly available data defines the Town of Carrboro Market Area as the Raleigh-Durham-Chapel Hill Combined Statistical Area (“CSA”) from the US Census Bureau.
4. See generally City of Richmond v. J. A. Croson Company, 488 U.S. 469, 507-508; 109 S. Ct. 706 (1989) (discussing factual predicate for race and/or gender conscious remedies or policies).
5. Id.
6. Id.; see also H.B. Rowe Company, Inc. v. W. Lindo Tippett, 615 F.3d 233, 256-58 (4th Cir. 2010) (finding strong basis in evidence for remedial action for African American and Native American firms, but no similar basis for inclusion of other minority groups (including women-owned businesses) in the remedial policy).

Town of Carrboro, NC
2025 Disparity Study

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CARRBORO TOWN HALL



TOWN OF CARRBORO • NC

**Executive
Summary**



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