



Good Faith Efforts

BDD looks at the

- Quality
- Quantity
- Intensity

There is no set formula or checklist. Each solicitation is unique but...

There is no checklist you can go through and at the end say you've definitely made a good faith effort. The point of good faith efforts is to demonstrate you did everything reasonable to utilize sufficient, capable firms to achieve the goal. However, there are some basic steps that if you do not take them, you will not have made a good faith effort.

Identify Subcontracting Opportunities



The first step is to identify subcontracting opportunities. This is the key to achieving your good faith efforts. It is important to note three things here:

1. You need to identify areas of work sufficient to meet the goals. If you only identify work that would constitute 8% of the contract value, you have not made a good faith effort on its face. If there's a barrier to meeting the goal due to the scope of work in the contract (for example, 70% of the contract value is for purchasing equipment or materials), you need to clearly explain that in your narrative and break out exactly how much work is available for subcontracting.
2. The fact that you generally self-perform a particular area of work is not sufficient reason to not meet the goal. The purpose of the program is to present subcontracting opportunities, you must look at all potential areas of work when determining subcontracting opportunities.
3. While it is good to use M/WBE suppliers and/or service providers, that alone is unlikely to be sufficient to meet your goal. In addition, if you use service providers (e.g., insurance broker or CPA) or bulk suppliers (e.g., fuel), you will need to be able to allocate a specific portion of their services to this particular contract and report accordingly so be sure you have appropriate accounting measures in place.

Search the Directory



- Identify NAICS Codes
www.census.gov/NAICS
- Must include the primary area of work
- Search Directory
flystl.diversitycompliance.com

The best way to search the directory is by NAICS codes. You can search the census website by keyword to identify the correct NAICS code(s) then search the directory with those codes. If you have difficulty identifying the appropriate NAICS codes, please contact our office. Failure to do so may have a negative impact on the evaluation of your efforts.

Be sure you are verifying certification in the directory. Firms may believe they are certified but are not. Also be sure you are using the City of St. Louis' directory. We do not recognize any other certifications.

Searching the Directory



You can find our local, M/WBE directory on our web page at www.flystl.com/bdd under Directories or go directly to it at flystl.diversitycompliance.com. On the Certification and Compliance Management System homepage, click on City of St. Louis M/WBE Directory under Vendor Certification to go to the directory search page.

City of St. Louis M/WBE Directory

Search City of St. Louis' M/WBE Directory by entering search terms and clicking **Search**. You must select at least one certification type.

For the federal DBE and ACDBE program, please use the [Missouri State DBE directory](#) to search for certified firms.

Search by Certification Type

Certifications Minority Business Enterprise (MBE)
 Women Business Enterprise (WBE)

Search by Business Name or DBA

Business Name/DBA
 Tip: Try just a few letters of the firm's name.

Search by Business Description

Business Description
 Tip: Try just a few letters of a keyword.

Search by Commodity Code

Commodity Codes

Search by Contact Person


Contact Person/Owner First name Last name
 Tip: Use the first letter. Tip: Try just the first few letters.

Search by Location

City
 Zip Code
 Tip: Search for multiple zip codes by separating with commas.
 State

Search by Reference

Ethnicity

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This will bring up the search page. There are three primary ways to search. You can search by a firm's name if you know it, search by the business description or search by Commodity Code. The best way is to search by Commodity Code.


Searching the Directory

Search by Commodity Code
Commodity Codes

Search by Commodity Code
Commodity Codes

Search Commodity Codes
Enter a search term and click **Search**. If multiple codesets are available, you can change the selected codeset in the drop down list under the search box. Click **Browse Codes** to view the code set list. When finished, click **Finish** to close this panel.

NAICS: North American Industry Classification System ▾

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In the Search by Commodity Code section, click on Click to Lookup Commodity Codes. This will expand the section and allow you to search by NAICS code or by NAICS code keyword. In the box under Search Commodity Codes, you can enter the NAICS code if you know it or enter a keyword to search by. NOTE: once you've entered the number or keyword you want to use to search, be sure you click the Search button and do not hit the Enter key which will return a list of the entire directory.


Search Commodity Codes

Click any **Add** link to select a code. You can also search again, sort the list, or click **Browse Codes** to browse through the entire code list. If multiple codesets are available, you can change the selected codeset in the drop down list under the search box. Click **Browse Codes** to view the code set list. When finished, click **Finish** to close this panel.

561720

NAICS: North American Industry Classification System To sort, click column title.

Actions	Code Type	Code	Code Description
Add	NAICS	561720	Aircraft janitorial services
Add	NAICS	561720	Building cleaning services, interior
Add	NAICS	561720	Building cleaning services, janitorial
Add	NAICS	561720	Cleaning homes
Add	NAICS	561720	Cleaning offices
Add	NAICS	561720	Cleaning shopping centers
Add	NAICS	561720	Custodial services
Add	NAICS	561720	Deodorant servicing of rest rooms
Add	NAICS	561720	Deodorizing services
Add	NAICS	561720	Housekeeping services (i.e., cleaning services)
Add	NAICS	561720	Janitorial services

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This will bring up a list of the NAICS codes (with specific examples) related to the keyword or number you've entered. Click Add next to the code/description that is applicable for the work you are looking to subcontract. NOTE: if there are multiple Code Descriptions with the same Code number, you only need to add one.

Searching the Directory

Search by Commodity Code

Commodity Codes

Click to Lookup Commodity Codes

NAICS 561720: Janitorial services [\(remove\)](#)

Options:

Match any codes with same number code [\(\)](#)

Include any lower level codes of those selected [\(\)](#)

[Clear All Commodity Codes](#)

Search Commodity Codes

Click any **Add** link to select a code. You can also search again, sort the list, or click **Browse Codes** to browse through the entire code list. If multiple codesets are available, you can change the selected codeset in the drop down list under the search box. Click **Browse Codes** to view the code set list. When finished, click **Finish** to close this panel.

561720

Search

Browse Codes

Finished

NAICS: North American Industry Classification System [^](#)

To sort, click column title.

Actions	Code Type	Code	Code Description
Add	NAICS	561720	Aircraft janitorial services
Add	NAICS	561720	Building cleaning services, interior

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Once you've added the code, under Options, be sure you check both "Match any codes with same number code" and "Include any lower level codes of those selected". This will ensure that all code descriptions are included in your search. You can repeat this process to add additional codes although we recommend searching for one code at a time based on the scope of the specific subcontracting opportunity. Once you've added all applicable codes, click the Search button at the bottom of the page to complete the search.

[Show directory information and instructions](#)

Search Parameters [Edit Parameters](#) [Clear Parameters](#)

Certifications: **Minority Business Enterprise (MBE)**
Women Business Enterprise (WBE)

Commodity Codes: **NAICS 561720: Janitorial services**


- Match any codes with same number code
- Include any lower level codes of those selected

[Search Again](#) [Download Search Results](#)

Search Results **29 firms with 43 certifications found**

Click the certification type for contact information and certification details

Vendor	Location	Certification
2 Women & A Broom Cleaning Company LLC	St. Louis, MO	MBE WBE
Best Choice Cleaning Services, LLC	University, MO	MBE
Budget Janitorial Service	East St. Louis, IL	MBE WBE
Cardinal Cleaning Crew, LLC	Overland, MO	WBE
Centaur Building Services	St. Louis, MO	WBE
Chore-Lees Angels Professional Cleaning Solutions, LLC	St. Louis, MO	MBE WBE

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The search will return a complete list of all certified firms with the selected NAICS codes.

STL JANITORIAL SAMPLE St. Louis, MO

Vendor Information CLOSE WINDOW [X] Print

Business & Contact Information

Business Name	STL JANITORIAL SAMPLE
Owner	Test Contact
Address	123 Main Street St. Louis, MO 12345
	> Map This Address
Phone	123-456-7890
Email	janitorial@test.com
Ethnicity	African American

Certification Information

Certifying Agency	St. Louis Lambert International Airport
Certification Type	MBE - Minority Business Enterprise
Certified Business Description	Janitorial Firm

Commodity Codes

Code	Description
NAICS 561720	Janitorial services

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You can then go into each individual record by clicking the certification hyperlink next to the firm which will give you their firm record.

[Show directory information and instructions](#)

Search Parameters Edit Parameters Clear Parameters

Certifications	Minority Business Enterprise (MBE) Women Business Enterprise (WBE)
Commodity Codes	NAICS 561720: Janitorial services • Match any codes with same number code • Include any lower level codes of those selected

Search Again Download Search Results


Search Results 30 firms with 44 certifications found
Click the certification type for contact information and certification details

You are about to export the search results to Excel. Depending upon the speed of your Internet connection and the size of the export file, it may take a few minutes to download the data.

ALERT: The information provided in the file is not to be used for unsolicited advertising, spam, or any other unauthorized use. Your activities from IP Number 12.45.192.96 on this website are tracked.

Include Commodity Codes in download

Download to Excel Download to CSV Cancel

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Or you can download all the results. To download, click on Download Search Results. This will expand the section to allow you the option to Download to Excel or CSV. We recommend that you check the box to Include Commodity Codes in download, especially if you searched for multiple NAICS codes at one time. The downloaded file will include the firm's name, contact information, certifications, and assigned NAICS codes and can be used to expedite contacts and tracking of outreach efforts. You can find more detailed instructions on searching the directory on our web page flystl.com/bdd.

Contact the Firms



- Contract Name
- Owner (St. Louis Lambert International Airport)
- Your Firm with Your Contact Information
- Specific Scope of Work
- Full SFB (or link to SFB)
- Deadline for Response

Tailor outreach message to firms with applicable NAICS codes. Contacts to firms need to be clear and expeditious. Mailing requests for bids is definitely not sufficient (or efficient). You also need to make sure you give firms adequate time to respond to your request. Sending a copy of the solicitation with no information on what scope you are soliciting 24 hours before the bid due date is a clear example of insufficient good faith efforts.



One contact is not enough. If you do not receive a response, you need to follow up. You should also try different methods of contact for your follow up. Repeatedly emailing but never picking up the phone is very unlikely to be sufficient.

Document, Document, Document



KEEP
CALM
AND
DOCUMENT
EVERYTHING

- Firm Name
- Contact
- Scope Solicited
- Method of Solicitation
- Date and Time
- Response
- Comments (e.g., reasons the firm did not bid, reason firm was not selected)

In addition to the documentation above, which should be submitted on the GFE form, you should keep copies of all written correspondence as that may be requested during our review process.

See Good Faith Efforts Report

Quality

- Did you identify sufficient areas of work to meet the goal?
- Did you identify firms with appropriate NAICS codes?
- Did you vet potential partners?
- Did you negotiate?
- What are your general practices around diversity and inclusion (not limited to this bid process)?

Identify **all** subcontracting, including areas you might normally self-perform.

Firms must have certification in appropriate NAICS codes.

It is the responsibility of the prime bidder to ensure firms have the capacity to perform the work they are being subcontracted. Utilizing firms that clearly lack that capacity may not be deemed good faith efforts.

You must actually request bid prices; cannot dictate prices. We may request copies of bids.

This may reference back to past participation on contracts or previous good faith efforts.

Quantity

- How many firms did you contact out of the available firms?

Ideally, you should contact all firms certified for each area of work. Even if you have established relationships, contacting additional firms demonstrates a good faith effort to achieve the goals of the program including increasing opportunities for the maximum number of firms and helps ensure the Airport receives the best value.

Intensity

- How often and what ways did you contact the firms?

See reference above to follow up and intensity of effort.

Pitfalls



- Not identifying sufficient work areas
- Not including the primary scope of work in subcontracting opportunities
- Only contacting enough firms to meet the goal
- Not providing a narrative (in cases where goal is not met)
- Not providing adequate documentation to verify efforts

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