



OFFICE OF ECONOMIC AND SMALL BUSINESS DEVELOPMENT

Governmental Center Annex
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MEMORANDUM

DATE: March 29, 2018

TO: Joel Mariani, Emergency Management Coordinator
Human Services, Office of Administrative Services (OAS)

THRU: Sandy-Michael McDonald, Director *SMM*
Office of Economic and Small Business Development

FROM: Freddy Castillo, Small Business Development Manager *FC*
Office of Economic and Small Business Development

SUBJECT: No CBE Goal for Westcot Cots, Racks, Dust Covers and Bedding

The Human Services Department's Office of Administrative Services (OAS) reported that this project will be solicited in compliance with Federal Procurement Standards, which will enable Broward County to receive Federal Emergency Management Agency (FEMA) reimbursement for utilization of this contract in the occurrence of a declared disaster event.

Federal Procurement Standards include Title 2 CFR Part 200, which requires the non-Federal entity (Broward County) to conduct procurements in a manner that prohibit the use of statutorily or administratively imposed in-State or local geographic preferences in the evaluation of bids or proposals. Therefore, consistent with Title 2 CFR Section 200.319(b), the Office of Economic and Small Business Development (OESBD) is unable to establish a County Business Enterprise (CBE) goal on this project.

Title 2 CFR Part 200 requires that Broward County takes all necessary affirmative steps to assure that minority firms, women's business enterprises, and labor surplus area firms are used when possible. Section 200.321 requires the non-Federal entity (Broward County) to take the following necessary affirmative steps in its procurement process:

- (1) Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- (2) Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- (3) Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;

(4) Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;

(5) Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and

(6) Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5) of this section.

This contract is not subject to the Broward County Workforce Investment Program.

If you have any questions or concerns regarding this assignment, please feel free to contact our office at (954) 357-6400.

cc: John W. Beckford, Human Services, Office of Administrative Services (OAS)
Oswaldo Casco, Small Business Development Specialist, OESBD