



**OFFICE OF ECONOMIC AND SMALL BUSINESS DEVELOPMENT**

Governmental Center Annex

115 S. Andrews Avenue, Room A680 • Fort Lauderdale, Florida 33301 • 954-357-6400 • FAX 954-357-5674

**MEMORANDUM**

**DATE:** January 18, 2017

**TO:** Polly Cacurak, Business Manager  
Broward Addiction Recovery Center Division

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

**FROM:** Christopher Atkinson, Assistant Director *Cl*  
Office of Economic and Small Business Development

**SUBJECT:** No CBE Goal for Temporary Nursing Personnel

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

The Broward Addiction Recovery Center Division (BARC) is seeking vendor(s) to provide temporary nursing personnel for their residential facilities. BARC has advised that these services will be partly funded by grant monies from the US Dept. of Health and Human Services and Florida Department of Children and Families (DCF). BARC has also advised that in utilizing these grants, Broward County must comply with Title 2 CFR Part 200 of the Federal Procurement Standards. Title 2 CFR Part 200 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, per Section 200.319. Therefore, the Office of Economic and Small Business Development (OESBD) is unable to establish County Business Enterprise (CBE) program goals.

Title 2 CFR Part 200 requires Broward County take 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 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;

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(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.

If you have any concerns, please contact our office at (954) 357-6400.

cc: Freddy Castillo, Small Business Development Manager, OESBD  
Lisette Forrest, Small Business Development Specialist, OESBD