



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: July 16, 2019

TO: Anika Hamilton, Business Manager
Broward Addiction Recovery Center Division (BARC)

THRU: Sandy- Michael McDonald, Director *SM*
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 In-House Pharmacy Management Services

Broward County is seeking a vendor to provide In-House Pharmacy Management Services for the County's Broward Addiction Recovery Division (BARC). The vendor shall provide an end-to-end solution that includes pharmacy staff, pharmacy equipment, equipment maintenance, pharmacy software, and consultant pharmacists for maintaining accreditation and meeting regulatory compliance.

BARC reported that funds will come through the Broward Behavioral Health Coalition, Inc. (BBHC) as pass-through funding from the Florida Department of Children and Families (DCF). Since this contract contains federal funds, federal law and regulations including, but not limited to, 2 CFR Part 200, are applicable, per the grant agreement with BBHC. Title 2 CFR Part 200 requires that the non-Federal entity (Broward County) conducts 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 the non-Federal entity (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: Maribel Feliciano, Assistant Director, OESBD
James Vose, Jr., Small Business Development Specialist, OESBD