



Mary T. Cagle  
Office of the Inspector General  
for Miami-Dade County Public Schools



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TO: Honorable Chairwoman Perla Tabares Hantman  
and Members of the School Board of Miami-Dade County, Florida  
Alberto Carvalho, Superintendent, Miami-Dade Public Schools

FROM: Mary T. Cagle, Inspector General

DATE: May 8, 2018

SUBJECT: Amendments to Board Policy 6320.02 – *Small/Micro and Minority/Women-Owned Business Enterprise Programs* and the Revised *Office of Economic Opportunity Administrative Procedures Manual*, Ref. GOBIG-0016

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On May 9, 2018, the School Board's Fiscal Accountability & Government Relations Committee will consider an item amending School Board Policy 6320.02-*Small/Micro and Minority/Women-Owned Business Enterprise Programs*. The item will then be presented at the regular meeting of the School Board on May 16, 2018 (Agenda Item E-117, cover page attached). It is respectfully suggested that you favorably consider the amended policy before you. We understand that the revised *Office of Economic Opportunity (OEO) Administrative Procedures Manual* will accompany the amended Policy at the Board's June meeting (second reading of Amended Policy 6320.02).

As you may recall, on February 2, 2018, the Office of Inspector General (OIG) issued a memorandum expressing concerns about ambiguities and inconsistencies within Board Policy 6320.02 and noting the need for further clarification of the *OEO Administrative Procedures Manual*. The OIG memorandum also encouraged greater participation in the review process by the Small Business Enterprise Advisory Committee (SBEAC). Subsequently, on February 14, 2018, the Administration withdrew the then revised *Administrative Procedures Manual*.

Mr. Torey Alston, the District's newly appointed Economic Equity and Diversity Officer, was then tasked with the responsibility of leading a review process to update Board Policy 6320.02 and the *OEO Administrative Procedures Manual*. The OEO was very receptive to input from the OIG, invited the OIG to all meetings of the SBEAC, and kept this office apprised of proposed modifications to both documents. The cooperative spirit and transparency demonstrated throughout the process is to be lauded.

As instructed by the Superintendent, the OEO staff sought input from all interested parties, categorized the various concerns, and presented a full range of issues to the SBEAC. The SBEAC met on multiple occasions to deliberate the proposed changes. We observed a very engaged SBEAC. While not all of the OIG recommendations were

adopted, all of our concerns, as noted in the February 2, 2018 OIG memorandum, were addressed in this process. As currently written, the changes to School Board Policy 6320.02 will be internally consistent with the proposed revisions to the *OEO Administrative Procedures Manual*. Notably, the issues of ownership, licensing, and place of business were addressed and made internally consistent.

On numerous occasions, the Superintendent has noted that the capital program includes many, many more projects to be awarded. The revisions to the policies and procedures pertaining to the Small/Micro Business Enterprise, Minority/Women-Owned Business Enterprise, and Veteran Business Enterprise programs provide much needed clarity to carry the program forward.

The OIG is grateful for the opportunity to collaborate with the professional staff of the School Board to improve this program. The decision to withdraw the *OEO Administrative Procedures Manual* in February, actively engage the SBEAC, and accept many of the suggestions made by the OIG to improve the internal consistency and integrity of the program has yielded positive results. Your favorable consideration of item E-117 is appreciated.

#### Attachment

cc: Daniel Tosado, Chief of Staff  
Lisa A. Martinez, Chief Strategy Officer  
Torey Alston, Economic Equity and Diversity Compliance Officer  
Walter Harvey, School Board Attorney  
Iraida Mendez-Cartaya, Interim Chief Auditor

Office of Superintendent of Schools  
Board Meeting of May 16, 2018

May 2, 2018

Lisa M. Martinez, Chief Strategy Officer

**SUBJECT:** INITIAL **READING: PROPOSED AMENDMENTS TO BOARD POLICY 6320.02, SMALL/MICRO, MINORITY/WOMEN-OWNED, AND VETERAN BUSINESS ENTERPRISE PROGRAMS**

**COMMITTEE:** FISCAL ACCOUNTABILITY AND GOVERNMENT RELATIONS

**LINK TO STRATEGIC BLUEPRINT:** EFFECTIVE AND SUSTAINABLE BUSINESS PRACTICES

At the November 15, 2017 meeting, the School Board approved Agenda Item G-1, requesting to amend School Board Policy 6320.02, *Small/Micro and Minority/Women-Owned Business Enterprise Programs*. To strive for greater small business participation and reduce barriers among local businesses, the Office of Economic Opportunity has revised School Board Policy 6320.02 *Small/Micro and Minority/Women-Owned Business Enterprise Programs*.

The Board policy provides for the implementation, certification, and compliance of the Small/Micro, Minority/Women, and Veteran Enterprise programs. On March 9, 2018, the Superintendent asked the Economic Equity and Diversity Compliance Officer to launch a comprehensive approach soliciting input from various stakeholder groups to enhance the School Board Policy 6320.02. The Office of Economic Opportunity designed its Inaugural Program Assessment and Stakeholder Survey receiving 136 surveys from local businesses and community organizations. Furthermore, after four special meetings providing input and suggestions along with public input, on April 19, 2018, the Small, Micro & M/WBE Advisory Committee unanimously endorsed recommended changes to School Board Policy 6320.02. The updated revisions include clarity on multiple items referenced by the Office of Inspector General in its memo dated February 2, 2018.

The recommended revisions to Board Policy 6320.02 is in alignment with Board Item E-116, also being presented, which provides for updates to the Office Economic Opportunity Administrative Procedures Manual.

Attached is the Notice of Intended Action and the Policy Amendments. Changes are indicated by underscoring words to be added and ~~striking through~~ words to be deleted.

**RECOMMENDED:** That The School Board of Miami-Dade County, Florida, adopt the proposed amendments to School Board Policy 6320.02, *Small/Micro, Minority/Women-Owned, and Veteran Business Enterprise Programs* and authorize the Superintendent to file the amended policies with the School Board of Miami-Dade County, Florida, to be effective June 20, 2018.