

PALM BEACH COUNTY
BOARD OF COUNTY COMMISSIONERS
AGENDA ITEM SUMMARY

Meeting Date:	November 18, 2025	☒ Consent	☐ Regular
		☐ Ordinance	☐ Public Hearing
Department:	Housing and Economic Development		
Submitted for:	Office of Small Business Development		

I. EXECUTIVE BRIEF

Motion and Title: Staff recommends motion to receive and file:

- A) the 2025 Disparity Study (Disparity Study) conducted by Griffin & Strong, P.C (Griffin & Strong); and
- B) the Economic Impact Study Final Report (E.I. Study) conducted by Griffin & Strong.

Summary: On July 2, 2024, the Board of County Commissioners (BCC) approved a contract with Griffin & Strong to conduct a disparity study and economic impact study of the availability and utilization of minority- and women-owned firms in Palm Beach County (County). The study period examined five (5) calendar years (2019 – 2023) of County contracts. Prior to the completion of the Disparity Study, the BCC passed Emergency Ordinance 2025-014, suspending all Palm Beach County Diversity Equity and Inclusion (DEI) programs, including enforcement of the race- and/or gender-conscious portions of Chapter 2, Article III, Division 2, Part C of the Palm Beach County Code and Policies and Procedures Manual CW-O-043 (the Equal Business Opportunity Program) in response to Presidential Executive Orders. Countywide (RS)

Background and Justification: In accordance with Emergency Ordinance 2025-014, no action will be taken at this time based on the Disparity Study results and recommendations other than to receive and file the report.

Attachment(s):

1. 2025 Disparity Study
2. Economic Impact Study Final Report

Recommended By:		10/16/2025
	Department Director	Date
Approved By:		11/16/25
	Deputy County Administrator	Date

II. FISCAL IMPACT ANALYSIS

A. Five Year Summary of Fiscal Impact:

Fiscal Years	2026	2027	2028	2029	2030
Capital Expenditures					
Operating Costs					
External Revenues					
Program Income (County)					
In-Kind Match (County)					
NET FISCAL IMPACT	\$0				

# ADDITIONAL FTE POSITIONS (Cumulative)	\$0				
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Is Item Included In Current Budget? Yes ☐ No ☒
 Does this Item include the use of Federal funds? Yes ☐ No ☒
 Does this Item include the use of State funds? Yes ☐ No ☒

Budget Account No.:

Fund ___ Dept. ___ Unit ___ Object ___ Program Code/Period _____

B. Recommended Sources of Funds/Summary of Fiscal Impact:

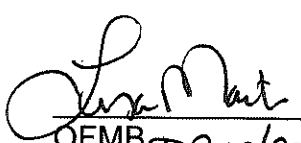
No additional fiscal impact.

C. Departmental Fiscal Review:


 Valerie Alleyne, Division Director II
 Finance and Administrative Services, DHED

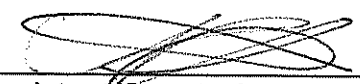
III. REVIEW COMMENTS

A. OFMB Fiscal and/or Contract Development and Control Comments:


 OFMB DA 10/20 PA 10/20


 Contract Development and Control 2010.21.25
 10/22/25 TW

B. Legal Sufficiency:


 Assistant County Attorney 10/23/25

C. Other Department Review:

 Department Director

PALM BEACH COUNTY

Disparity Study Final Report

September 2025



**GRIFFIN
STRONG**

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GRIFFIN & STRONG, PROJECT TEAM

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- McArthur's Own, Local Partner – Anecdotal Interviews
- Coleman PR & Consulting, Local Partner – PR & Community Engagement
- Creative Research Solutions, Survey of Business Owners

I. INTRODUCTION

A. Scope of Work

In 2024, Palm Beach County, Florida ("County") contracted with Griffin & Strong ("G&S") to perform a comprehensive disparity study ("Study"), to determine whether a disparity exists between the percentage of available Minority- and Women-owned firms (referred to as "MBE" and "WBE" respectively or collectively, "M/WBE") within the market and the percentage of these firms utilized by the County in its procurement process.

Further, the purpose of this project is to conduct a Study to determine if there continues to be a strong basis in evidence showing that willing and able Minority-and Women-owned businesses are significantly underutilized in construction, professional services, and goods and services contracts awarded by the County and if so, the extent to which such disparities may be attributed to discrimination.

Governmental entities across the country authorize disparity studies in response to City of Richmond v. J.A. Croson Co., 488 U.S. 469 (1989) and subsequent cases in order to determine whether there is a compelling interest for the creation or continuation of remedial procurement programs, based upon race, gender, and ethnicity. For the legal requirements of Croson and its progeny to be satisfied for any race or gender-based activities, G&S must determine whether the County has been a passive or active participant in any identified discrimination.

Toward achievement of these ends, G&S has analyzed the prime contractor contracting and subcontracting activities for County's purchases in the Industry Categories of Construction, Professional Services (CCNA), Professional Services (Non-CCNA), Services, and Goods/Commodities during the five (5) year period from January 1, 2019, through December 31, 2023 (CY2019-CY2023) ("Study Period"). Below is a terminology key for business owner descriptions and their meanings as they are used throughout the report.

TERM	MEANING
Minority-owned	certified or self-identified Minority-owned business
Woman-owned	certified or self-identified Woman-owned business
MBE	certified Minority-owned Business Enterprise
WBE	certified Woman-owned Business Enterprise
M/WBE	certified Minority- and Woman-owned Business Enterprise (referenced together as a group)
Non-M/WBE	not certified as Minority- or Woman-owned Business Enterprise
White American-owned	self-identified White Woman or Male-owned business
White Male-owned	self-identified White Male-owned business

Griffin & Strong, 2025

B. Objectives

The principal questions of this Study were:

1. Is there a statistically significant disparity within the Relevant Geographic Market Area between the percentage of certified Minority- and Women-owned businesses willing and able to provide goods or services to the County in each of the categories of contracts and the percentage of dollars spent by the County or County contractors with such firms?
2. If a statistically significant disparity exists, have factors other than race and gender been ruled out as the cause of the disparity?
3. Can the disparity be adequately remedied with race- and gender-neutral remedies?
4. If race- and gender-neutral remedies are not sufficient, does the evidence from the Study legally support consideration (or continuation) of race- and/or gender-conscious remedial program elements?
5. Are the proposed remedies narrowly tailored to the findings of the Study?

C. Technical Approach

In conducting this Study and preparing its recommendations, G&S followed a carefully designed work plan that allowed Study team members to fully analyze Availability, Utilization, and Disparity with regard to participation. The final work plan consisted of, but was not limited to, the following major tasks:

1. Establishing data parameters and finalizing a work plan;
2. Legal analysis;
3. Reviewing policy and procurement processes;
4. Collecting electronic data, inputting manual data, organizing and cleaning data, and filling any data gaps;
5. Conducting geographic and product market area analyses;
6. Conducting Utilization analyses;
7. Determining the Availability of qualified firms;
8. Analyzing the Utilization and Availability data for disparity and statistical significance;
9. Conducting private sector analysis including credit and self-employment analysis;
10. Collecting and analyzing anecdotal evidence;
11. Establishing findings of fact regarding the existence and nature of marketplace discrimination and/or other barriers to Minority- and Women-owned business participation in the County's contracts; and
12. Preparing a final report that identifies and assesses the efficacy of various race- and gender-neutral and narrowly tailored race- and gender-based remedies if indicated by the findings.

D. Report Organization

This report is organized into the following sections, which provide the results of G&S's analytical findings and offer recommendations for the County. In addition to this introductory chapter, this report includes:

- Chapter II, which presents the Executive Summary of Findings and Recommendations;
- Chapter III, which is an overview of the legal framework and basis for the Study;

- Chapter IV, which provides a review of the County's purchasing policies, practices, and programs;
- Chapter V, which presents the methodology used in the collection of statistical data from the County and the analyses of the data regarding relative M/WBE Availability and Utilization analyses, and includes a discussion on levels of disparity for the County's prime contractors and subcontractors;
- Chapter VI, which analyzes whether present or ongoing effects of past discrimination are affecting the County's marketplace; and
- Chapter VII, outlines the qualitative analyses: the analysis of anecdotal data collected from the online survey, anecdotal interviews, focus groups and public meetings.

II. EXECUTIVE SUMMARY OF FINDINGS AND RECOMMENDATIONS

This chapter presents the findings and recommendations resulting from the disparity study for Palm Beach County, Florida, ("County") related to Construction, Professional Services (CCNA), Professional Services (Non-CCNA), Services, and Goods/Commodities for January 1, 2019 – December 31, 2023 (CY2019-CY2023).

A. Findings

1. Policy Findings

FINDING 1: PURCHASING THRESHOLDS

For the Study Period, the County purchasing threshold policies are as follows:

Below \$100,000

Request for Quotation (RFQ): an informal procurement method where price is the determining factor when selecting a vendor.

Request for Submittal (RFS): an informal procurement method where established criteria, in addition to price, are considered.

\$100,000 and above

Invitation for Bid (IFB): a formal procurement method used when price is the determining factor when selecting a vendor.

Request for Proposal (RFP): a formal procurement method used when established criteria, in addition to price, are considered. Awards are based on the evaluation of a Selection Committee.

\$200,000 & above

Formal Bid Contracts that require Board Approval.¹

FINDING 2: DECENTRALIZED PURCHASES (DPOS)

Decentralized Purchase Order (DPO) is a contracting method used by County Departments for purchases valued under \$5,000 when the goods or services are not available through an existing contract.²

¹ These thresholds were revised after the Study Period. See County Ordinance 2024-010. Informal procurement now applies to contracts or purchases under \$150,000; formal bidding is required for contracts of \$150,000 or more; Board approval is required for contracts in excess of \$300,000. *Id.*

² This DPO threshold was raised to \$10,000 after the Study Period. See County Ordinance 2024-010.

County Departments are required to get two or three quotes depending on the dollar amount of the DPO and approval from the County Resource Manager is required when applicable.

If an S/M/WBE is available to provide the good(s) or service(s) (i.e., listed in the County's Vendor Directory), the S/M/WBE must be contacted for a quote, and the 10% Price Preference API will apply.³

FINDING 3: THE OFFICE OF EQUAL BUSINESS OPPORTUNITY (OEBO) – PURCHASING ROLES

An OEBO representative is a member of the permanent Contract Review Committee (CRC) assigned to review and approve/reject specific additional services against Professional Services Agreements and change order requests against construction contracts from Lead and User Departments that meet the CRC threshold requirements.

An OEBO representative is also a member of the Short and Final Selection List Committee for CCNA and non-CCNA professional service projects to which the EBO applies.

FINDING 4: SOLICITATION REVIEW

The County regularly reviews solicitations for opportunities to break down projects into smaller, more manageable components, sometimes by geographic region. This approach has shown success in certain cases, such as with lawn maintenance contracts.

FINDING 5: DEPARTMENTAL PURCHASING FOR CONSTRUCTION

Under the County's Purchasing Code, the authority for construction-related procurements is delegated to the following Departments: Facilities Development and Operations (FDO), Department of Airports (DOA), Engineering and Public Works (EPW), Environmental Resources Management (ERM), and Water Utilities Department (WUD).

FINDING 6: PURCHASES SUBJECT TO CONSULTANTS COMPETITIVE NEGOTIATION ACT (CCNA), SECTION 287.055, FLORIDA STATUTES

The Purchasing Department does not issue solicitations for Consultants Competitive Negotiation Act (CCNA) professionals. Instead, these solicitations are issued by the County's five construction departments listed in the above finding. CCNA covers professionals who provide engineering, architecture, surveying and mapping, and landscape architecture services.

³ Palm Beach County Purchasing Department, Purchasing Policy and Procedures, PPM #: CW-L-008, Section II.C.

For construction projects requiring CCNA services, the CCNA statute does not apply if the estimated basic construction cost of the project is below \$325,000.

As part of CCNA purchasing, the Short List Committee reviews proposals from CCNA certified firms, evaluates qualifications, and shortlists for consideration by the Final Selection Committee a minimum of two or more firms than the number to be selected. Depending on the number of proposals received, the item may go straight to a final selection committee.

FINDING 7: BONDING

Florida law mandates that a payment and performance bond be provided for the construction or renovation of any publicly owned facility. The requirement for a bond may be waived, however, for contracts valued at \$200,000 or less.⁴

The County separately provides for a review of bonding assistance, and under this policy certain projects under \$200,000 do not require a bond or a bond waiver.⁵

FINDING 8: PROMPT PAYMENT

Florida's prompt payment statute applies to local governments and agencies. Construction payments for billed services are due from the government twenty-five business days after the date on which the payment request is approved and stamped by the government customer as having been received. Generally, the prime contractor must pay subcontractors and suppliers within 10 days after the prime contractor's receipt of payment from the government.

FINDING 9: VENDOR REGISTRATION

All vendors (prime and subcontractors) providing goods or services to the County must be registered through Vendor Self Service (VSS), a module of Advantage, where vendors can register and access County solicitations for all goods and services.

FINDING 10: LIMITED PREQUALIFICATION

County ordinance allows for the prequalification of vendors for specific types of goods and services.⁶ Several County departments have, accordingly, established prequalification lists, including but not limited to FDO

⁴ Fla. Stat. § 255.05.

⁵ See Palm Beach County, Bond Waiver Program, PPM#: CW-F-01, April 3, 2013; Palm Beach County Ordinances, §. 2-80.27(1)(a).

⁶ County Code of Ordinances § Sec. 2-54(f)(8); PPM#: CW-L-008, Section III(G)(8); PPM#: PA-O-002, Section III(E).

and Purchasing. These lists are often established and maintained in furtherance of awarding annual contracts, though there is no express written policy linking prequalification to annual contracts.

FINDING 11: EXPERIENCE REQUIREMENTS (PREQUALIFICATION) FOR ANNUAL CONTRACTS

Firms seeking an award of an annual contract submit a “Qualification Application” with the soliciting department. One aspect of the qualification application may be a minimum experience requirement (between three and seven years of experience); these experience requirements are not set forth in the County policies or ordinances but have been historically used by County departments to ensure adequate experience/capacity, according to staff. Departments have the ability to establish minimum criteria based on the needs of the individual solicitation. If the County’s qualification requirements are met, the firm is added to the annual contract pool established by the soliciting department. According to policy interviews with Palm Beach County staff, a few MBEs have complained to staff about these experience requirements.

FINDING 12: CERTIFICATION

A firm will not qualify for selection consideration as a County S/M/WBE unless it is certified by the OEBO by the solicitation due date.

For the period of April 2018–2028, the County has an interlocal certification agreement with the City of West Palm Beach and the School District of Palm Beach County.

MBEs certified only by the State do not qualify for selection considerations under the County’s Equal Business Opportunity (EBO) Program (e.g., evaluation preferences or participation goals).

FINDING 13: SMALL BUSINESS ENTERPRISE (SBE) ELIGIBILITY

The County defines SBEs as “a corporation, partnership, sole proprietorship, or other legal entity for the purpose of making a profit that:

- (1) is independently owned and operated by individuals legally residing in, or that are citizens of, the United States or its territories; and
- (2) is currently certified as having annual revenues that satisfy S/M/WBE size standards on an industry specific basis (i.e., Construction, CCNA Professional Services including Architectural and Engineering Design firms, Professional Services, Goods, and Other Services) that are reflected in the PPM (Policy and Procedure Manual); and
- (3) is domiciled in Palm Beach County and satisfies the Significant Business Presence and other eligibility requirements for participation in the EBO Program as defined herein.”

FINDING 14: SBE (AND M/WBE) SIZE STANDARDS

During the Study Period, the County's annual gross revenue size standards for SBEs (i.e., "Small Business Enterprises") were:

1. Construction Services: \$9,000,000
2. Professional Services procured pursuant to the CCNA statute: \$5,000,000
3. Non-CCNA Professional Services: \$4,000,000
4. Goods: \$5,000,000
5. Other Services: \$4,000,000

In March 2024, the SBE size standards were amended to:

1. Construction: \$13 million
2. CCNA Professional Services: \$7 million
3. Non-CCNA Professional Services: \$5.7 million
4. Goods: \$7 million
5. Other Services: \$5.7 million

In determining eligibility for SBE classification, a firm's annual gross revenues are averaged over the previous three most recent years, or if firm has been in business less than three years, the annual gross revenues are averaged over the duration of the provider's existence.

FINDING 15: GRADUATED S/M/WBES

Firms that have graduated from the S/M/WBE program by exceeding the size standards can reapply for certification following the expiration of the two-year period immediately after graduation. This certification will only be granted if the S/M/WBE firm's annual revenues have fallen below the small business size standards for the relevant industry for two consecutive years after the initial post-graduation period.

FINDING 16: S/M/WBE DIRECTORY

Palm Beach County maintains an online directory of certified firms as part of the County vendor directory. The directory can be searched by certification type, commodity/service, address, and contact information.

FINDING 17: ASPIRATIONAL MBE AND WBE GOALS

The County applied annual aspirational participation goals for MBEs and WBEs based on the results of a 2017 disparity study. The goals were integrated into the EBO ordinance. The County (via the GSC) adopted revised aspirational goals in 2025, outside of the Study Period.

FINDING 18: CONTRACT-BY-CONTRACT/PROJECT SBE GOALS

By ordinance, there is a minimum mandatory SBE participation goal of 20% on County funded contracts.⁷ There may also be aspirational or contract-by-contract subcontracting M/WBE goals set on the project.⁸ SBE participation goals are often set on multi-trade projects, whereas SBE preferences are generally used for single trade projects.

Proposed subcontractor participation goals are based on the registered firms in the County Purchasing vendor database and determined based on availability numbers.

FINDING 19: GOAL WAIVERS

There are three types of waivers for the application of participation goals that may be requested and obtained:

1. Department pre-bid waivers, wherein departments provide reasons for why the application of a goal is not feasible;
2. Good faith efforts waivers, wherein a bidder provides reasons why an applied subcontracting participation goal is not feasible; and
3. Post-bid waivers, wherein a prime contractor submits reasons why an intended S/M/WBE subcontractor is unable or no longer available to perform and cannot be replaced by another S/M/WBE firm.⁹

FINDING 20: SBE BID PREFERENCES

For IFBs and RFQs, a responsive and responsible certified SBE that meets or exceeds the established goal will replace the Non-SBE bid, provided the SBE bid does not exceed the lowest bid by more than 10%. For RFPs and RFSs, certified SBEs are typically eligible to receive evaluation points for SBE participation.

FINDING 21: PREFERENCE FOR LOCAL FIRMS

The Local Preference applies to procurements of \$5,000 or more, when not prohibited by other laws. Preference is given to bidders or proposers who have a permanent place of business in Palm Beach County before the County issues a solicitation for goods or services.¹⁰ For an IFB or RFQ, a responsive and responsible local bidder meeting the requirements above will replace a non-local bidder, provided the local vendor's bid does not exceed the lowest bid by more than 5%. For an RFP or RFS, local vendors may receive additional points, not to exceed 5% of the total possible points.

⁷ Palm Beach Cty., Fla., Code § 2-80.27 (2025).

⁸ Palm Beach Cty., Fla., Code § 2-80.27(2) (2025).

⁹ The EBO Program ordinance provides that a prime contractor must obtain prior approval from the EBO Office before substituting an S/M/W/B/E subcontractor with another certified firm. Section 2-80.27(2)(B).

¹⁰ This threshold was raised to \$10,000 after the Study Period. See PPM#: CW-L-008, Section IV(B).

FINDING 22: TRACKING AND REPORTING S/M/WBE UTILIZATION

The County uses the Enterprise Contract Management System (eCMS), an internal system, to monitor S/M/WBE participation in County contracts. All subcontractor payments (S/M/WBEs and Non-S/M/WBEs) are tracked in the eCMS and the OEBO Administration system. The Department issuing a solicitation is responsible for collecting and entering S/M/WBE participation forms into eCMS for tracking.

FINDING 23: COMMERCIAL NONDISCRIMINATION POLICY

The County has a nondiscrimination ordinance which requires a commercial nondiscrimination clause be put into “all the County contracts that result from Formal Solicitations.”¹¹

FINDING 24: OFFICE OF EQUAL BUSINESS OPPORTUNITY (OEBO)

The OEBO is expressly intended to “foster the inclusion of local small, minority, women-owned business enterprises (S/M/WBE) in the county’s procurement process which influences the economic development of the county.” The ordinance establishing the OEBO also outlines the duties and performance measures for the Office.¹²

FINDING 25: OEBO DEBRIEFINGS

Upon request, the OEBO offers debriefings to any respondent or bidder after an award has been made. These debriefings include a review of the bid response, pricing, and other supporting documents.

FINDING 26: THE EBO ADVISORY COMMITTEE

The County has an Equal Business Opportunity Advisory Committee (EBOAC). There are regular reports on certification and outreach presented by the County to the Committee.

2. Quantitative Analysis Findings

FINDING 27: RELEVANT GEOGRAPHIC MARKET AREA

The Study compares the Availability and Utilization of firms in a common area, the Relevant Geographic Market Area, which is where the Study determines at least 75% of the agency’s spending with firms. The Relevant Geographic Market Area was determined to be Palm Beach County based on the following percentages of spending:

¹¹ Palm Beach Cty., Fla., Code § 2-80.24 (2025).

¹² Outside of the Study Period (in June 2025), the County passed an ordinance which expressly suspended certain aspects of the EBO Program, including race- and/or gender-conscious affirmative procurement initiatives; race- and/or gender- conscious subcontracting goals; and certifying businesses as minority- or women-owned.

- Construction: 88.93%
- Professional Services (CCNA): 89.63%
- Professional Services (Non-CCNA): 42.64%
- Services: 74.09%
- Goods/Commodities: 44.53%

Given that 76.82% of all the County spending outside of Goods/Commodities was with firms located in the County, G&S determined that one consistent Relevant Geographic Market Area across all Industry Categories was appropriate.

FINDING 28: AVAILABILITY

The measures of Availability utilized in this Study incorporate all the criteria of Availability required by City of Richmond v. J.A. Croson Co., 488 U.S. 469 (1989).

- The firm operates within an Industry Category from which the County procures goods or services.
- The firm's owner has taken steps (such as registering, bidding, certifying, prequalifying, etc.) to demonstrate interest in doing business with government.
- The firm is located within the Relevant Geographic Market Area.

The firms used to calculate Availability came from the Master Vendor File in the Relevant Geographic Market Area. G&S found that firms were available to provide goods and/or services to the County as reflected in the following percentages by each race, ethnicity, and gender group (Table 1).

***Table 1: Availability Estimates by Industry Category
In the Relevant Geographic Market Area
(Based upon the Master Vendor File)
Palm Beach County 2025 Disparity Study***

Business Ownership Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities
Asian American	0.58%	3.45%	0.67%	0.40%	0.53%
African American	5.36%	3.59%	6.33%	6.14%	3.69%
Hispanic American	4.43%	4.97%	2.00%	2.43%	1.80%
Native American	0.00%	0.00%	0.08%	0.00%	0.00%
TOTAL MINORITY	10.37%	12.00%	9.08%	8.97%	6.03%
White Woman	2.80%	3.45%	3.04%	1.86%	3.99%
TOTAL M/WBE	13.17%	15.45%	12.11%	10.83%	10.01%
Non-M/WBE	86.83%	84.55%	87.89%	89.17%	89.99%
TOTAL	100.00%	100.00%	100.00%	100.00%	100.00%

Griffin & Strong, 2025

FINDING 29: M/WBE PRIME UTILIZATION (LOCAL DOLLARS AND STATE DOLLARS)

Based on local payment dollars, Table 2 shows that the County paid a total of \$370,440,141 in prime Construction in the Relevant Geographic Market Area during the Study Period, and of this amount, \$39,273,253, or 10.60%, was paid to M/WBEs. M/WBEs were paid 20.15% of Professional Services (CCNA), 4.82% of Professional Services (Non-CCNA), 26.87% of Services, and 5.26% of Goods/Commodities. M/WBEs were paid 11.83% of prime payments across all Industry Categories (\$107,823,871).

**Table 2: Summary of Prime Utilization by Industry Category
In the Relevant Geographic Market Area
(Based upon Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 12,401,284	\$ 127,393	\$ 598,967	\$ 2,432,444	\$ 133,845	\$ 15,693,932
Asian American	\$ 43,793	\$ 9,656,973	\$ 2,383,758	\$ 354,933	\$ 6,898,509	\$ 19,337,967
Hispanic American	\$ 13,198,627	\$ 3,321,656	\$ 469,688	\$ 12,598,688	\$ 2,906,536	\$ 32,495,195
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 25,643,704	\$ 13,106,022	\$ 3,452,413	\$ 15,386,065	\$ 9,938,890	\$ 67,527,094
White Woman	\$ 13,629,549	\$ 3,802,921	\$ 278,744	\$ 19,339,425	\$ 3,246,138	\$ 40,296,776
TOTAL M/WBE	\$ 39,273,253	\$ 16,908,943	\$ 3,731,158	\$ 34,725,490	\$ 13,185,028	\$ 107,823,871
Non-M/WBE	\$ 331,166,889	\$ 67,023,055	\$ 73,610,787	\$ 94,533,308	\$ 237,398,575	\$ 803,732,613
TOTAL FIRMS	\$ 370,440,141	\$ 83,931,998	\$ 77,341,945	\$ 129,258,798	\$ 250,583,602	\$ 911,556,484
Business Ownership Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	3.35%	0.15%	0.77%	1.88%	0.05%	1.72%
Asian American	0.01%	11.51%	3.08%	0.27%	2.75%	2.12%
Hispanic American	3.56%	3.96%	0.61%	9.75%	1.16%	3.56%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	6.92%	15.62%	4.46%	11.90%	3.97%	7.41%
White Woman	3.68%	4.53%	0.36%	14.96%	1.30%	4.42%
TOTAL M/WBE	10.60%	20.15%	4.82%	26.87%	5.26%	11.83%
Non-M/WBE	89.40%	79.85%	95.18%	73.13%	94.74%	88.17%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Griffin & Strong, 2025

PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Based on state payment dollars, Table 3 shows that the County paid a total of \$47,009,703 in prime Construction in the Relevant Geographic Market Area during the Study Period, and of this amount, \$5,915,317, or 12.58%, was paid to M/WBEs. M/WBEs were paid 17.39% of Professional Services (CCNA), 25.94% of Professional Services (Non-CCNA), 18.05% of Services, and 0.63% of Goods/Commodities. M/WBEs were paid 12.20% of prime payments across all Industry Categories (\$8,675,831).

**Table 3: Summary of Prime Utilization by Industry Category
In the Relevant Geographic Market Area
(Based upon State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 3,422,105	\$ 32,212	\$ 21,701	\$ 254,901	\$ 400	\$ 3,731,318
Asian American	\$ 0	\$ 746,743	\$ 435,604	\$ 0	\$ 0	\$ 1,182,347
Hispanic American	\$ 1,107,185	\$ 61,630	\$ 35,417	\$ 1,010,301	\$ 4,338	\$ 2,218,870
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 4,529,290	\$ 840,585	\$ 492,722	\$ 1,265,201	\$ 4,738	\$ 7,132,536
White Woman	\$ 1,386,026	\$ 65,603	\$ 0	\$ 34,152	\$ 57,513	\$ 1,543,295
TOTAL M/WBE	\$ 5,915,317	\$ 906,188	\$ 492,722	\$ 1,299,353	\$ 62,251	\$ 8,675,831
Non-M/WBE	\$ 41,094,386	\$ 4,305,391	\$ 1,407,079	\$ 5,900,174	\$ 9,749,503	\$ 62,456,534
TOTAL FIRMS	\$ 47,009,703	\$ 5,211,579	\$ 1,899,801	\$ 7,199,527	\$ 9,811,754	\$ 71,132,364
Business Ownership Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	7.28%	0.62%	1.14%	3.54%	0.00%	5.25%
Asian American	0.00%	14.33%	22.93%	0.00%	0.00%	1.66%
Hispanic American	2.36%	1.18%	1.86%	14.03%	0.04%	3.12%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	9.63%	16.13%	25.94%	17.57%	0.05%	10.03%
White Woman	2.95%	1.26%	0.00%	0.47%	0.59%	2.17%
TOTAL M/WBE	12.58%	17.39%	25.94%	18.05%	0.63%	12.20%
Non-M/WBE	87.42%	82.61%	74.06%	81.95%	99.37%	87.80%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Griffin & Strong, 2025

FINDING 30: M/WBE TOTAL UTILIZATION

Total Utilization is presented in Table 4. Total Utilization presents the percentage of all dollars spent by the County that went to M/WBEs whether as prime contractors or subcontractors.¹³

- In Construction, MBEs received \$28,074,872, or 7.58%, while WBEs earned \$20,001,456, or 5.40%. M/WBEs received 12.98% of the Construction dollars in Total Utilization.
- M/WBEs in Professional Services (CCNA) received a total of \$22,181,953, or 26.43% with MBEs being paid \$18,664,842, or 22.24%. WBEs were paid \$3,517,111, or 4.19%.
- MBEs in Services earned \$16,809,865, or 13.00% while WBEs were paid \$19,339,425, or 14.96%. M/WBEs received 27.97% of Services dollars in Total Utilization.
- Overall, MBEs across the three (3) Industry Categories included in Total Utilization received \$63,549,578, or 10.89% while WBEs earned \$42,857,992, or 7.34%. M/WBEs received 18.23% of all dollars in Total Utilization.

Table 4: Total Utilization
In the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Industry Category
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Business Ownership Classification	Construction	Professional Services (CCNA)	Services	TOTAL
	(\$)	(\$)	(\$)	(\$)
African American	\$ 7,497,513	\$ 5,092,347	\$ 2,432,444	\$ 15,022,304
Asian American	\$ 267,481	\$ 9,503,853	\$ 354,933	\$ 10,126,267
Hispanic American	\$ 20,309,878	\$ 4,068,642	\$ 14,022,488	\$ 38,401,008
Native American	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 28,074,872	\$ 18,664,842	\$ 16,809,865	\$ 63,549,578
White Woman	\$ 20,001,456	\$ 3,517,111	\$ 19,339,425	\$ 42,857,992
TOTAL M/WBE	\$ 48,076,327	\$ 22,181,953	\$ 36,149,290	\$ 106,407,571
Non-M/WBE	\$ 322,363,814	\$ 61,750,045	\$ 93,109,508	\$ 477,223,366
TOTAL FIRMS	\$ 370,440,141	\$ 83,931,998	\$ 129,258,798	\$ 583,630,936
Business Ownership Classification	Construction	Professional Services (CCNA)	Services	TOTAL
	(%)	(%)	(%)	(%)
African American	2.02%	6.07%	1.88%	2.57%
Asian American	0.07%	11.32%	0.27%	1.74%
Hispanic American	5.48%	4.85%	10.85%	6.58%
Native American	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	7.58%	22.24%	13.00%	10.89%
White Woman	5.40%	4.19%	14.96%	7.34%
TOTAL M/WBE	12.98%	26.43%	27.97%	18.23%

Griffin & Strong, 2025

¹³ In a prime contractor analysis, if an award of \$1 million is made to a Non-M/WBE firm the entire \$1 million is attributed to the Non-M/WBE category. In Total Utilization if the Non-M/WBE prime contractor subcontracts \$100,000 to an African American-owned firm and \$200,000 to an Asian American-owned firm, only \$700,000 will be accounted for in the Non-M/WBE category, \$100,000 to the African American category, and \$200,000 to the Asian American category.

FINDING 31: SUMMARY OF DISPARITY ANALYSIS (LOCAL DOLLARS)

Table 5 below indicates those M/WBE groups where a statistically significant disparity was found in Prime Utilization for Construction, Professional Services (CCNA), Professional Services (Non-CCNA), Services, or Goods/Commodities using local dollars.¹⁴ African American and Asian American-owned firms were underutilized in Construction and Services; Hispanic American-owned firms were also underutilized in Construction, but it was not statistically significant. African American and Hispanic American-owned firms were underutilized in Professional Services (CCNA). All M/WBE groups except Asian American-owned firms were underutilized in Professional Services (Non-CCNA). In Goods/Commodities, only Asian American-owned firms were not underutilized. Note that in all Industry Categories except Professional Services (Non-CCNA), Native American-owned firms had no representation in Availability.

G&S also conducted a disparity analysis for contracts under \$1 million and under \$500,000. For contracts under \$1 million:

- African American-owned firms were underutilized in every Industry Category except Professional Services (CCNA)—their underutilization in Professional Services (Non-CCNA) was not statistically significant.
- Asian American-owned firms were underutilized in Construction.
- Hispanic American-owned firms were underutilized in Construction and Goods/Commodities.
- Native American-owned firms were underutilized in Professional Services (Non-CCNA), which was the only Industry Category they had representation for in Availability.
- White Woman-owned firms were underutilized in Professional Services (CCNA), Professional Services (Non-CCNA), and Goods/Commodities, and were not statistically significantly underutilized in Professional Services (CCNA).

For contracts under \$500,000, the results were largely the same as for under \$1 million except that:

- African American-owned firms were underutilized in Professional Services (CCNA) and no longer underutilized in Professional Services (Non-CCNA).
- White Woman-owned firms were no longer underutilized in Professional Services (CCNA).
- Hispanic American-owned firms were no longer statistically significantly underutilized in Goods/Commodities.

¹⁴ G&S analyzed local and state funded projects separately because certain outcomes and recommendations from the Study are not permitted, by law, to be applied to state funded contracts.

Table 5 below summarizes the results of the disparity analysis of M/WBEs in Prime Utilization. An X indicates statistically significant underutilization, while an * indicates underutilization that is not statistically significant. Blank cells reflect overutilization. A dash (-) indicates no available firms, and therefore no disparity analysis was conducted.

**Table 5: Summary of Statistically Significant Underutilization of M/WBEs
in Prime Utilization
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Owner Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities
African American	X	X	X	X	X
Asian American	X			X	
Hispanic American	*	X	X		X
Native American	-	-	X	-	-
White Woman			X		X
Non-M/WBE		*		*	

Griffin & Strong, 2025

Legend:

X Statistically significant underutilization
 * Underutilization (not statistically significant)
 - No Availability/No Disparity Analysis
 (Blank) Overutilization

Table 6 below indicates those M/WBE groups where a statistically significant disparity was found in Total Utilization for Construction, Professional Services (CCNA), and Services.¹⁵ Again, an X indicates statistically significant underutilization, while an * indicates underutilization that is not statistically significant. Blank cells reflect overutilization. A dash (-) indicates no available firms, and therefore no disparity analysis was conducted.

In Construction and Services, both African American- and Asian American-owned firms were underutilized while both being overutilized in Professional Services (CCNA). Hispanic American-owned firms in Professional Services (CCNA) were underutilized but not at statistically significant level while being overutilized in the other two Industry Categories. White Woman-owned firms were overutilized across the three Industry Categories in Total Utilization.

**Table 6: Summary of Statistically Significant Underutilization of M/WBEs
in Total Utilization
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Owner Classification	Construction	Professional Services (CCNA)	Services
African American	X		X
Asian American	X		X
Hispanic American		*	
Native American	-	-	-
White Woman			
Non-M/WBE	P	*	*

Griffin & Strong, 2025

Legend:

X Statistically significant underutilization
 * Underutilization (not statistically significant)
 - No Availability/No Disparity Analysis
 P Parity
 (Blank) Overutilization

¹⁵ There was no substantial amount of spend by primes with subcontractors for Professional Services (non-CCNA) and Goods/Commodities Industry Categories.

FINDING 32: SUMMARY OF PRIME DISPARITY ANALYSIS (STATE DOLLARS)

Table 7 shows the Disparity Indices comparing Utilization based on state-funded payments to the corresponding availability estimates.

**Table 7: Summary of Statistically Significant Underutilization of M/WBEs
in Prime Utilization
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Owner Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities
African American		X	X	X	X
Asian American	X			X	X
Hispanic American	X	X	*		X
Native American	-	-	X	-	-
White Woman		X	X	X	X
Non-M/WBE	P	*	*	*	

Griffin & Strong, 2025

Legend:

X Statistically significant underutilization

* Underutilization (not statistically significant)

- No Availability/No Disparity Analysis

P Parity

(Blank) Overutilization

3. Marketplace Disparities Findings

FINDING 33: M/WBE FIRMS HAVE SMALLER FIRM SHARE

For Palm Beach County, relative to White American-owned firms, the estimated market firm shares of Minority- and Women-owned businesses has an upper and lower bound of approximately 23% (Women) and 0.0006 percent (Native Hawaiian and Pacific Islanders) respectively. As these bounds are substantially within that for firms owned by White Americans—approximately 85%. This is consistent with and

suggestive of, but not necessarily causal evidence for, Minority- and Women-owned businesses facing discriminatory barriers to entry and performance in the private sector of Palm Beach County as revenue is dominated by White American-owned firms. (Source: US Census Bureau Annual Business Survey)

FINDING 34: WOMEN, AFRICAN AMERICANS, AND HISPANIC AMERICANS ARE LESS LIKELY TO BE SELF-EMPLOYED

Relative to White Males, Women, African Americans, and Hispanic Americans are less likely to be self-employed. This is suggestive of these type of firms facing barriers to self-employment in Palm Beach County. The lower self-employment likelihood of these type of Minority- and Women-owned businesses could reflect disparities in public contracting as there is research evidence that the self-employment rate of African Americans is increasing with respect to the provisioning and establishment of M/WBE public procurement programs.¹⁶ (Source: US Census Bureau American Community Survey)

FINDING 35: WOMEN, AFRICAN AMERICANS, AND HISPANIC AMERICANS ARE LESS LIKELY TO BE SELF-EMPLOYED IN CONSTRUCTION

Relative to firms owned by White Males, Women, African Americans, and Hispanic Americans are less likely to be self-employed, in the Palm Beach County construction sector. This is suggestive of these type of firms facing barriers to self-employment in the Palm Beach County construction sector. The lower likelihood of these type of Minority- and Women-owned businesses being self-employed in the construction sector could reflect disparities in public contracting as there is research evidence that the self-employment rate of African Americans in construction is increasing with respect to the provisioning and establishment of M/WBE public construction procurement programs.¹⁷ (Source: US Census Bureau American Community Survey)

FINDING 36: M/WBEs LOW BUILDING PERMIT SHARES

The estimated low commercial building permit shares for M/WBEs in Palm Beach County are suggestive of private sector barriers that constrain the ability of these type of firms to participate in the economy. Our estimates suggest that Non-M/WBE firms accounted for approximately 97% of building permits in Palm Beach County. To the extent that experience acquired by participating in the private sector economy translates into an enhanced capacity to compete in the market for public sector contracts and subcontracts, the almost complete dominance of Non-M/WBEs in securing building permits suggest the presence of private sector barriers faced by M/WBEs. In this context, if there are any public contracting/subcontracting disparities between Minority- and White Women-owned businesses and Non-minority firms in Palm Beach County, it could constitute passive discrimination against Minority- and White Women-owned businesses. The disparities could reflect barriers, possibly discriminatory, that Minority- and White Women-owned businesses face in the private sector which serve to undermine their capacity to compete successfully for contracts and subcontracts. (Source: Palm Beach County Building Permits)

¹⁶ Chatterji, Aaron K., Kenneth Y. Chay, and Robert W. Fairlie. 2014. "The Impact of City Contracting Set-asides on Black Self-employment and Employment." *Journal of Labor Economics* 32: pp. 507-561.

¹⁷ Marion, Justin. 2009. "Firm Racial Segregation and Affirmative Action in the Highway Construction Industry." *Small Business Economics* 33: Article 441.

FINDING 37: AFRICAN AMERICAN AND HISPANIC AMERICAN-OWNED BUSINESSES REPORTED TO HAVE LESS BUSINESS LOAN DENIALS

Certified Minority-owned firms are less likely to be denied commercial bank loans. When disaggregated by the race/ethnicity/gender of owners, firms owned by African Americans and Hispanic Americans are less likely to have been denied commercial bank loans. This suggests that in the Palm Beach County, any public procurement disparities between Non-minorities and these type of Minority- and White Women-owned businesses in Palm Beach County cannot be explained, at least in part, by differential access to private credit (e.g., race-based credit market discrimination) that enables financing a capacity for success in public procurement. (Source: Griffin & Strong Survey of Business Owners)

FINDING 38: AFRICAN AMERICAN AND HISPANIC AMERICAN-OWNED FIRMS ARE MORE LIKELY TO BE NEW FIRMS

Firms owned by African Americans and Hispanic Americans are relatively more likely to be new firms. This suggests that any public contracting disparities between Non-M/WBEs and those firms owned by African Americans and Hispanic Americans can possibly be explained by lower levels of market experience necessary for competing successfully for public procurement. (Source: Griffin & Strong Survey of Business Owners)

FINDING 39: M/WBEs ARE NO MORE OR LESS LIKELY TO SUBMIT PRIME BIDS

There are no differences in the relative likelihood of certified M/WBEs to submit prime bids in Palm Beach County. When disaggregating by race/ethnicity/gender status, firms owned by Hispanic Americans are more likely to submit prime bids relative to Non-M/WBEs. This suggests that any disparities in public procurement outcomes between firms owned by these type of M/WBEs and Non-M/WBEs in Palm Beach County cannot be explained, at least in part, by their relatively lower prime bid submission rates. (Source: Griffin & Strong Survey of Business Owners)

FINDING 40: M/WBEs ARE NO MORE OR LESS LIKELY TO WIN PRIME CONTRACT AWARDS

Relative to Non-M/WBEs, firms certified as M/WBE are neither more or less likely to win prime contracts with Palm Beach County. When disaggregating by the race/ethnicity/gender status of firm owners, firms owned by Women are less likely to win prime contract awards from Palm Beach County. This suggests that, with the exception of firms owned by Women, for M/WBEs in general, there are no prime contract award disparities between M/WBEs and Non-M/WBEs with Palm Beach County. (Source: Griffin & Strong Survey of Business Owners)

FINDING 41: AFRICAN AMERICAN, OTHER RACE AMERICAN, AND WOMEN-OWNED FIRMS ARE LESS LIKELY TO WIN SUBCONTRACT AWARDS

Relative to White Male-owned firms, firms owned by African Americans, Other Race Americans, and Women are less likely to win a subcontract award from Palm Beach County. This suggests that at least for these type of Minority- and White Women-owned firms—who are not necessarily certified—any disparities between them and White Male-owned firms in public contracting awards can be explained, at least in part,

by less contracting experience acquired through subcontracting. (Source: Griffin & Strong Survey of Business Owners)

FINDING 42: WOMEN-OWNED FIRMS ARE MORE LIKELY TO HAVE NEVER BEEN A PRIME OR SUB WITH THE COUNTY

Firms owned by Women are relatively more likely to have “never” been a prime contractor or subcontractor with Palm Beach County. To the extent that success in public contracting is proportional to having prior prime contracts or subcontracts, any contracting disparities between WBEs and White Male-owned firms can possibly be explained by their relative disadvantage in having secured prior prime contracts or subcontracts from Palm Beach County. (Source: Griffin & Strong Survey of Business Owners)

FINDING 43: M/WBE’s EXPERIENCES OF DISCRIMINATION IN THE PRIVATE SECTOR

Relative to White Male-owned firms, firms owned by Bi/Multiracial Americans are relatively more likely to experience perceived discrimination in the private sector of Palm Beach County. To the extent that private sector discrimination can undermine the capacity of M/WBEs to compete for public sector procurement, private sector discrimination may explain, at least in part, public contracting disparities between firms owned by Bi/Multiracial Americans and White Male-owned firms. (Source: Griffin & Strong Survey of Business Owners)

FINDING 44: M/WBE’s EXPERIENCES OF DISCRIMINATION WITH THE COUNTY

Relative to White Male-owned firms, firms owned by African Americans, Hispanic Americans, and Bi/Multiracial Americans are relatively more likely to experience perceived discrimination by Palm Beach County. To the extent that discrimination by Palm Beach County can undermine the capacity and willingness of Minority- and White Women-owned businesses to compete for public sector procurement, perceived discrimination by Palm Beach County can possibly explain, at least in part, public contracting disparities between White Male-owned firms and those owned by African Americans, Hispanic Americans, and Bi/Multiracial Americans. (Source: Griffin & Strong Survey of Business Owners)

FINDING 45: M/WBE PARTICIPATION REQUIREMENTS

Relative to White Male-owned firms, firms owned by Hispanic Americans and Bi/Multiracial Americans are more likely to agree that Non-minority prime contractor firms only use M/WBEs when required. This suggests that, at least for these type of M/WBEs, subcontracting disparities between them and Non-minority owned firms can be explained, at least in part, by the lack of enforcing M/WBE participation requirements on Palm Beach County public contracting awards to Non-minority owned firms. (Source: Griffin & Strong Survey of Business Owners)

FINDING 46: INFORMAL NETWORKS

Relative to White Male-owned firms, firms owned by African Americans, Hispanic Americans, and Asian Americans are more likely to agree informal networks are important for public contracting success with Palm Beach County. This suggests that, at least for these type of M/WBEs, contracting disparities between

them and White Male-owned firms can be explained, at least in part, by their exclusion from Palm Beach County public contracting networks that reduces their ability to secure prime contracts and subcontracts. (Source: Griffin & Strong Survey of Business Owners)

4. Anecdotal Findings

FINDING 47: COMMUNICATION AND OUTREACH

Outreach from the County to new, small, and Minority-owned firms who register to do business with them appears to be inconsistent.

According to the Study's Survey of Business Owners (Appendix L: Survey of Business Owners: Table 91), when asked if they felt that Palm Beach County provides adequate outreach and supportive services to businesses interested in contracting with the County, 24.4% of participants selected agree or strongly agree, 50.5% selected neither agree nor disagree, and 25% of participants selected disagree or strongly disagree.

FINDING 48: BIDDING PROCESS AND EXCESSIVE PAPERWORK

The bidding process in Palm Beach County was identified as frustrating by some firms operating in the area, with complaints citing lengthy, paperwork-heavy processes; lack of transparency; and little to no feedback regarding failed bids.

According to the Study's Survey of Business Owners (Appendix L: Survey of Business Owners: Table 90), 20.9% of survey participants disagreed or strongly disagreed when asked if they feel that there is full transparency of Palm Beach County's procurement process and its sharing of information, and an additional 19.3% of participants identified excessive paperwork as a barrier to their firm obtaining work in Palm Beach County.

FINDING 49: CERTIFICATION

The certification process was referred to as confusing and difficult by some firms, and many participants felt that certification itself lacks practical benefits, with 23.9% of survey participants selecting that they are not certified because they do not understand how certification would benefit their firm (Table 75, Appendix L: Survey of Business Owners).

FINDING 50: INFORMAL NETWORK

Participants acknowledged and discussed the presence of an informal network of contractors in Palm Beach County in the form of unattainable networking connections and perceived predetermination of where and to whom contracts will be awarded.

54.6% of survey participants felt that there is an informal network of prime and subcontractors present in Palm Beach County that monopolizes the public contracting process, and an additional 49.3% of participants felt that their company's exclusion from this informal network has prevented them from winning contracts with Palm Beach County (Table 82, Table 83, Appendix L: Survey of Business Owners).

FINDING 51: FIRM SIZE

Some participants found the Palm Beach County marketplace to be difficult to break into, or inaccessible for smaller firms, with 19.8% of survey participants feeling that they were unable to compete with larger firms for contracts in the Palm Beach County marketplace. Others cited the lack of a proper "ecosystem" for small businesses in the County, arguing that County lacks the necessary foundation to engage, support, and facilitate the growth of small firms.

FINDING 52: PRIME CONTRACTORS & "GOOD FAITH EFFORTS"

Some participants expressed concern with whether prime contractors in Palm Beach County operate "in good faith" to utilize Minority- and Woman-owned firms.

When asked, 41% of survey participants felt as though some White Male prime contractors/vendors only utilize S/M/WBE companies when required to do so by Palm Beach County (Table 89, Appendix L: Survey of Business Owners). Additionally, 26.6% of participants agreed that some White Male prime contractors/vendors will include a S/M/WBE company on a bid or other solicitation to meet participation goals, then drop the company as a subcontractor after winning the award (Table 87, Appendix L: Survey of Business Owners), and 35.4% of participants agreed that some White Male prime contractors/vendors will contact a S/M/WBE company to ask for quotes but never give the proposal sufficient review to consider giving that firm the award (Table 86, Appendix L: Survey of Business Owners).

FINDING 53: LACK OF INFORMATION AND ACCESS TO CAPITAL

Participants identified that lack of access to information related to operating a business in the County, as well as capital, as significant barriers to participation for some small and Minority-owned firms in the area. Business owners shared desires to "level the playing field" for small and Minority-owned firms, expanding the marketplace and ultimately benefiting the County.

FINDING 54: INSURANCE, BONDING, AND CREDIT

Insurance, bonding, credit, and financing were all identified as barriers to participation by participants across data collection methods, with specific attention being paid to their harmful impacts on small and Minority-owned businesses in the area.

According to the survey's study of business owners, 10.9% of participants identified bid bond requirements as a barrier to their firm obtaining work in the County, 9.5% of participants identified insurance

requirements as a barrier, 13.3% of participants identified financing as a barrier, and 15.5% of participants identified pre-qualification requirements as a barrier.

FINDING 55: PROMPT PAY

Concerns with lack of prompt pay from the County and its effect on cash flow were identified by both prime and subcontractors operating in Palm Beach County.

According to Table 41 of the Study's Survey of Business Owners (Appendix L: Survey of Business Owners), upon receipt of invoice to the County, 46.6% of prime contractors are paid within thirty (30) days, while 24.1% are paid within sixty (60) days, 15.5% are paid within ninety (90) days, and 3.4% noted that they waited more than 120 days to receive payment. Additionally, 20.9% of subcontractors are paid within thirty (30) days, while 29.9% are paid within sixty (60) days, 26.9% are paid within ninety (90) days, and 7.5% noted that they waited more than 120 days to receive payment upon receipt of invoice to prime contractors (Table 43, Appendix L: Survey of Business Owners).

FINDING 56: LIMITED PERCEIVED OPPORTUNITIES

Some participants expressed that they found Palm Beach County's marketplace to be limiting, favoring particular industries and making it difficult for firms who do not provide a particular set of services to do business with the County even if the County purchases their types of goods and services. When asked, 21.1% of survey participants selected that they have not attempted to do business with the County because they do not see opportunities in their field of work (Table 21, Appendix L: Survey of Business Owners).

FINDING 57: ACCOUNTS OF DISCRIMINATION

9 anecdotal interview participants shared their experiences with discrimination in the Palm Beach County marketplace, with several Minority business owners recounting experiences of perceived racism and sexism in the Palm Beach County marketplace.

As outlined respectively (Table 79 and Table 80, Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners, 19% of participants felt as though they experienced discriminatory behavior from the private sector (i.e., non-governmental entities) from January 1, 2019, through December 31, 2023, and 12% of business owners expressed that they felt they experienced discriminatory behavior from Palm Beach County government during the Study Period.

5. Legal Finding

FINDING 58: LEGAL FINDING

Consistent with the "narrow tailoring" requirements of the strict scrutiny analysis (discussed at length in the Legal Chapter), Palm Beach County continued to implement both race and gender-neutral measures and race and gender-conscious measures to try to increase utilization of the M/WBEs, but the present Study

shows that those efforts have not been fully effective in resolving or avoiding identified disparities specific to race, ethnicity, and/or gender in the studied Industry Categories.

Of note, the statistical analysis does show, however, overutilization of certain race, ethnic, or gender groups in certain of the Industry Categories studied. The narrow tailoring requirements under the controlling case law preclude the County from including the overutilized groups in any remedial efforts directed toward disparities that were identified in the Study.

The use of regression analysis and consideration of the contracting environment in the private sector as part of this Study have established a strong basis in evidence for concluding that factors other than race and/or ethnicity cannot fully account for the statistical disparities found for the underutilized Study Groups. Stated otherwise, Palm Beach County can show that status as a racial or ethnic minority may have an adverse impact a firm's ability to secure contracting opportunities with the County, further supporting more aggressive remedial efforts.

B. Commendations

COMMENDATION 1: BOND WAIVERS

G&S commends the County on its policy of waiving the requirement for a payment or performance bond on certain County construction contracts valued at \$200,000 or less.

COMMENDATION 2: OFFICE OF EQUAL BUSINESS OPPORTUNITY

An OEBO representative is a member of the permanent Contract Review Committee assigned to review and approve/reject specific additional services for Professional Services contracts and change order requests for Construction contracts from Lead and User Departments. An EBO representative is also a member of the CCNA Short and Final Selection List Committees.

OEBO hired a full-time Outreach/Public Information Coordinator in 2020.

G&S commends the County's OEBO for reporting that it has provided technical assistance and/or support services to 1,685 S/M/WBEs in FY 2022.

Further commendations for the OEBO offering debriefings, upon request, to any respondent or bidder. These debriefings include a review of the bid response, pricing, and other supporting documents.

In addition, the County regularly reviews solicitations for opportunities to break down projects into smaller, more manageable components, sometimes by geographic region. This approach has shown success in certain cases, such as with lawn maintenance contracts.

COMMENDATION 3: MENTOR-PROTÉGÉ INITIATIVE

G&S commends the County, through the County Administrator and Directors of FDO and OEBO for, in 2019, launching the Construction Manager at Risk (CM@R) Pilot Program, a mentor-protégé initiative. This program provides up to five percent (5%) evaluation preference for construction-related Request for Proposals (RFPs) to firms that commit to mentoring S/M/WBE firms by offering management guidance and training. From 2019 to 2022, thirteen (13) County-funded contracts using the CM@R contracting method were awarded by FDO, each including an S/M/WBE partner. The project values range from \$6.8 million to \$50 million, and M/WBEs received over an estimated \$19.43 million in pre-construction and construction fees. All the mentees were M/WBEs.

COMMENDATION 4: CCNA COMPETITIVE SELECTION PROCESS POINT AWARDS

G&S commends the County for allocating up to three (3) points in the CCNA competitive selection process for a team for the project based on the total cumulative percentage of work carried out by personnel located within the team's Palm Beach County offices. These points can be awarded for work performed by the prime consultant, one or more subconsultants, or a combination of both.

COMMENDATION 5: CONSTRUCTION FIRM SELECTION

G&S commends the County that SBE (or M/WBE or DBE) participation is used as a tie breaker for a tie in the selection of Construction Managers and Design Build firms.

COMMENDATION 6: REAPPLICATION TO S/M/WBE PROGRAM AFTER GRADUATION

G&S commends the County for allowing firms that have graduated from the S/M/WBE program by exceeding the size standards to reapply for certification following the expiration of the two-year period immediately after graduation.

COMMENDATION 7: ONLINE S/M/WBE DIRECTORY

G&S commends the County for maintaining a directory of certified firms that is available to the public online as part of the County vendor directory.

COMMENDATION 8: REQUIREMENT TO CONTACT S/M/WBEs FOR QUOTES

G&S commends the County for the requirement that for Decentralized Purchase Orders (DPOs), if an S/M/WBE is available to provide the good(s) or service(s) (i.e., listed in the County's Vendor Directory), the S/M/WBE must be contacted for a quote.

COMMENDATION 9: COMMERCIAL NONDISCRIMINATION POLICY

G&S commends the County for having a commercial nondiscrimination policy to ensure that the County is not a passive participant in the discrimination by its prime contractors.

C. Recommendations

RECOMMENDATION 1: CONTINUE SBE CONTRACT-BY-CONTRACT GOALS

The County should continue to set race-neutral goals on a contract-by-contract basis. However, there should not be a minimum percentage. Goals should be set based upon a realistic assessment of availability of the scopes of work in that particular contract.

RECOMMENDATION 2: TRACK UTILIZATION

In line with the County's nondiscrimination policy, G&S recommends that the County continue to track utilization of all demographic groups. Without tracking participation, it would be difficult to determine whether there has been discriminatory activity on the part of prime contractors, and the County has an obligation not to be a passive participant in the active discrimination by such prime contractors. It should be noted that this is not a diversity, equity, or inclusion recommendation. It is a recommendation to recognize and prevent discrimination.

41% of survey participants responded that they believed that some Non-minority prime contractors only utilize small, minority, and women own firms when required to do so by Palm Beach County. This is another important reason why the County should continue tracking small, Minority, and Women-owned firm participation to see if there is a lack of participation and therefore potentially the presence of discrimination in the marketplace.

RECOMMENDATION 3: SMALL BUSINESS CERTIFICATION

23.9% of survey respondents said that they are not certified because they don't understand how certification would benefit their firm. Given that the County has recently suspended its M/WBE program provisions, that may also be true for M/WBE certification. However, G&S recommends that the County continue to certify small businesses and include race, ethnicity, and gender classifications in order to track participation. Otherwise, the County may be unable to readily detect and remedy violations of its race-neutral commercial nondiscrimination policy.

Further, the County should accept all certifications from bona fide certification agencies, including the State of Florida even when a project is not governed by the CCNA statute. This removes the burden from small businesses so they do not have to go through multiple certification processes. Efforts to promote regional certification reciprocity within the Relevant Geographic Market Area, and to establish uniform certification application forms and procedures should continue to the extent legally possible so as to lessen the administrative burden on prospective S/M/WBE bidders, and to facilitate their inclusion in the County's bidding process.

To qualify as a small business in Palm Beach County, firms must meet the "significant presence" test. The County's significant presence test should be expanded to require that a certain percentage of firm resources are housed in the County, such as percentage of employees, or that the County is the firm's headquarters.

As a good example, the city of Charlotte, North Carolina, also has a significant presence test for its small business program that includes the following:

- Is the business enterprise headquartered or has an office in the Charlotte CSA;
- Number of full-time employees in the CSA;
- Location of managerial or decision-making personnel;
- Lease agreement;
- Post office box, mail drop, or message center;
- Previous work or contracts performed in the Charlotte CSA; and
- Percentage of income or revenue derived from Charlotte CSA.

G&S also recommends that the County only graduate SBEs from its small business program once a firm has exceeded the size standard for two or three consecutive years. This will prevent a “yo-yo effect” of firms losing work after graduating but not being able to rejoin the program until two years have passed. An alternative approach is to establish a two-tiered SBE program: one certification tier for emerging SBEs and another for more established SBEs that have been in business for at least five years. This gives the new entrant/emerging SBEs the opportunity to establish a track record.

RECOMMENDATION 4: SMALL BUSINESS RESERVE

G&S recommends that the County establish a small business reserve to aid with the utilization of small and local firms. A small business reserve provides for a certain threshold, under which only small businesses can bid. This responds to the pervasive complaints of unfair competition with large firms (19% of survey respondents said that they cannot compete with larger firms) and gives smaller firms the opportunity to act as prime contractors.

RECOMMENDATION 5: LIMIT THE USE OF ANNUAL CONTRACTS FOR PROFESSIONAL SERVICES UNLESS NOT PRACTICAL TO BID OUT

The County should establish a policy to ensure that whenever possible, annual contracts are only used when it is not practical to solicit for a project-specific contract, such as in emergency or maintenance situations. Annual contracts are a double-edged sword. On the one hand they can benefit M/WBE firms if they are included in the pool of awardees and are actually receiving their relative percentages of task orders and payments. However, without careful monitoring, annual contracts can, per se, be exclusionary and keep M/WBEs from entering a field for three to five years or be part of the pool but get little or no task orders and payments.

RECOMMENDATION 6: BETTER ENFORCEMENT OF PROMPT PAY PROVISION

As mentioned in Anecdotal Finding 55, concerns regarding the lack of prompt pay from the County and its impact on firms' cash flow were identified by both prime and subcontractors operating in Palm Beach County. The survey responses indicated that 43% of prime contractors and 64.3% of subcontractors were paid after more than 30 days. G&S recommends that Palm Beach County implement better enforcement of the prompt payment statute that Construction payments be paid within twenty-five (25) business days after

the date on which the proper payment request is stamped by the County and that prime contractors generally are required to pay their subcontractors within ten (10) days after the prime contractor's receipt of payment. This process would include implementing an internal review of the County's invoices and monitoring how long it takes for a prime contractor to be paid by the County.

Additionally, staff interviews indicated that most prompt payment issues were due to inadequate paperwork submission by vendors, so G&S recommends that education be provided/increased by the County on how to properly submit invoices and any other necessary documentation.

RECOMMENDATION 7: REQUIRE FIRMS TO REGISTER IN ORDER TO BID

The County should require all bidders to register as vendors in order to bid. This will provide the County with access to more available firms to notify about bid opportunities as well as allow the County to obtain more information about the firms that are bidding with the County.

RECOMMENDATION 8: IMPROVE OUTREACH AND SUPPORTIVE SERVICES

25% of survey respondents thought that the County did not provide adequate outreach and supportive services, 24.4% believed it was sufficient, and the remainder neither agreed or disagreed that the outreach and supportive services were sufficient. This means there are more opportunities for the County to reach more firms. Additional efforts to reach out to educate and inform possible bidders and respondents could increase the pool of M/WBEs and other firms who are in fact ready, willing, and able to do business with the County and successfully winning awards. These additional efforts could be in the areas of financial bonding and technical support.

RECOMMENDATION 9: REVIEW PAPERWORK REQUIREMENTS

19.3% of survey respondents identified excessive paperwork as a barrier. The County should review and streamline the bidding process, so the required submissions are not overly burdensome, particularly for small firms on smaller projects.

RECOMMENDATION 10: ELIMINATE M/WBE PREFERENCES

G&S recommends that the County eliminate prime preferences/points for M/WBEs. It is important that prime contractors are on equal footing in bidding for contracts with the County.

RECOMMENDATION 11: IMPROVE COMMUNICATION OF DEBRIEFING AVAILABILITY

While it is commendable that the OEBO offers debriefings to any respondent or bidder, anecdotal evidence shows that firms are often frustrated with lack of communication from the County after not winning a contract. Therefore, firms may not know debriefings to review their bid response are available to them upon request. G&S recommends that the County engage in better communication with firms so that this resource is available to them.

RECOMMENDATION 12: DATA REFORM

1. Standardize Funding Source Tracking
 - a) The County currently limits race- and gender-conscious goals to projects funded by local dollars. To support consistent and reliable analysis, all procurement and payment databases should include a standardized field for funding sources or funding types (e.g., local, state, federal, other).
2. Bid Tabulations
 - a) In helping to build a large volume of local vendors for outreach, it should be mandatory for vendors to register with the County before being able to place a bid.

III. LEGAL ANALYSIS

A. Introduction

Palm Beach County has engaged Griffin & Strong (G&S) to conduct a disparity study of the County's purchasing practices to determine if there continues to be a strong basis in evidence showing that willing and able Minority- and Women-owned business enterprises (M/WBEs) are significantly underutilized in Construction, Professional Services (CCNA), Professional Services (Non-CCNA), Goods, and Other Services contracts awarded by the County, and if so, the extent to which such disparities may be attributed to discrimination—either current discrimination, or the present effects of past discrimination. The Study will review Palm Beach County purchasing practices from January 1, 2019, through December 31, 2023 (Study period).

As part of the Study, this Legal Analysis Chapter will present the important historical background guiding the development of Disparity Studies generally, which effectively began in the United States Supreme Court more than thirty-five years ago and has been carried forward to the present time by federal and state courts faced with legal challenges to Minority- and Women-owned business enterprise (M/WBE) programs and policies.¹⁸

The parameters of the current Study of Palm Beach County's procurement policies and practices, and the various qualitative and quantitative methodologies employed therein, are the product of developing case law and decades of practical experience. Therefore, G&S will also provide a more comprehensive discussion of the key judicial decisions addressing methodological considerations, legal considerations, and related evidentiary requirements for sustaining a legally defensible inclusion program. This analysis is supplied in the Expanded Legal Analysis, included as Appendix B.

In each of these analyses, G&S specifically includes discussion of key decisions from the United States Court of Appeals for the Eleventh Circuit, as these decisions, along with the Supreme Court precedents, establish the legal foundation under which any evaluation of or challenge to any of Palm Beach County's policies or programs would be analyzed.

B. Development of the Law Governing M/WBE Programs and Disparity Studies

The recognition and growth of Disparity Studies began in response to legal challenges made against federal, state, and local M/WBE programs enacted to remedy past or present discrimination. Such Studies were effectively invited by the United States Supreme Court in rendering its seminal decision in City of Richmond

¹⁸ For clarity and consistency, these programs will be generally referenced herein as "M/WBE" programs when not case-specific.

v. J. A. Croson Company,¹⁹ and subsequent judicial decisions have drawn a direct line between Croson and the utilization of Disparity Studies.²⁰

Disparity Studies have therefore become an important tool for governmental entities in deciding whether to enact Minority and/or gender business inclusion programs or legislation, and in justifying existing programs or legislation in the face of constitutional challenge.

To fully appreciate the usefulness of Disparity Studies for development and defense of governmental purchasing programs, including race or gender classified programs (i.e., M/WBE programs), an overview of the Croson decision and its progeny is helpful.

1. The Supreme Court's Decision in City of Richmond v. Croson

In its Croson decision, the Supreme Court ruled that the City of Richmond's Minority Business Enterprise (hereinafter "MBE") program failed to satisfy the requirements of "strict scrutiny." "Strict scrutiny" review involves two co-equal considerations: First, the need to demonstrate a compelling governmental interest; second, implementation of a program or method narrowly tailored to achieve/remedy the compelling interest. In Croson, the Supreme Court concluded that the City of Richmond failed to show that its Minority set aside program was "necessary" to remedy the effects of discrimination in the marketplace.

In fact, the Court found that the City of Richmond had not established the necessary factual predicate to infer that discrimination in contracting had occurred in the first place. The Court reasoned that a mere statistical gap between the overall Minority population in Richmond (50% African American) and awards of prime contracts to Minority-owned firms (0.67 percent to African American firms) was an irrelevant statistical comparison and insufficient to raise an inference of discrimination.

Addressing the evidence that Richmond proffered to justify its MBE program, the Court emphasized the need to distinguish between "societal discrimination," which it found to be an inappropriate and inadequate basis for social classification, and the type of identified discrimination that can support and define the scope of race-based relief.

Specifically, the Court opined that a generalized assertion of past discrimination in an entire industry provided no guidance in determining the present scope of the injury a race-conscious program seeks to remedy and emphasized that "there was no direct evidence of race discrimination on the part of the City in

¹⁹ 488 U.S. 469; 109 S. Ct. 706; 102 L. Ed. 2d 854 (1989)

²⁰ See, for example, Adarand Constructors, Inc. v. Slater (Adarand VII), 228 F.3d 1147, 1172-73 (10th Cir. 2000) ("Following the Supreme Court's decision in Croson, numerous state and local governments have undertaken statistical studies to assess the disparity, if any, between availability and utilization of minority-owned businesses in government contracting.").

letting contracts or any evidence that the City's prime contractors had discriminated against Minority-owned subcontractors."²¹

Accordingly, the Court concluded there was no prima facie (on its face/first impression) case of a constitutional or statutory violation by anyone in the construction industry that might justify the MBE program. Justice O'Connor nonetheless provided some guidance on the type of evidence that might indicate a proper statistical comparison:

[W]here there is a significant statistical disparity between the number of qualified minority contractors willing and able to perform a particular service and the number of such contractors actually engaged by the locality or the locality's prime contractors, an inference of discriminatory exclusion could arise.²²

Stated otherwise, the statistical comparison should be between the percentage of M/WBEs in the marketplace qualified to do contracting work (including prime contractors and subcontractors), and the percentage of total government contract awards (and/or contractual dollars paid) to Minority firms. The relevant question among lower federal courts has been which tools or methods are best for such analysis; a matter addressed in the detailed discussion of statistical comparison provided in the Expanded Legal Analysis.

Additionally, the Court in Croson stated that identified anecdotal accounts of past discrimination also could provide a basis for establishing a compelling interest for local governments to enact race-conscious (or gender or ethnicity-conscious) remedies. However, conclusory claims of discrimination by government officials alone would not suffice, nor would an amorphous claim of societal discrimination, simple legislative assurances of good intention, or congressional findings of discrimination in the national economy. To uphold a race or ethnicity-based program, the Court held, there must be a determination that a strong basis in evidence exists to support the conclusion that the remedial use of race is necessary.²³

Regarding the second prong of the strict scrutiny test, the Croson Court ruled that Richmond's MBE program was not narrowly tailored to redress the effects of discrimination.²⁴ First, the Court held that Richmond's MBE program was not remedial in nature because it provided preferential treatment to Minority groups, such as Eskimos and Aleuts, for which there was no evidence of discrimination in Richmond. Thus, the scope of the City's program was too broad.²⁵

Second, the Court ruled that the thirty percent (30%) goal for MBE participation in the Richmond program was a rigid quota not related to identified discrimination. Specifically, the Court criticized the City for its

²¹ Croson, 488 U.S. at 480.

²² Id. at 509.

²³ Id. at 498, 500, 505.

²⁴ Id. at 506.

²⁵ Id.

lack of inquiry into whether a particular Minority business, seeking racial preferences, had suffered from the effects of past discrimination.²⁶

Third, the Court noted that the City failed to initially consider race-neutral alternatives to remedy the underrepresentation of minorities in contract awards.²⁷

Finally, the Court highlighted the fact that the City's MBE program contained no sunset provisions for a periodic review process intended to assess the continued need for the program.²⁸

Subsequent to the decision in Croson, the Supreme Court and the federal Circuit Courts of Appeal have provided additional guidance regarding the considerations, measurements, information, and features surrounding a M/WBE program which will assist in protecting the program from constitutional challenge under a strict scrutiny analysis.²⁹ This guidance provides a sort of template for Disparity Studies and is therefore discussed in greater detail in the Expanded Legal Analysis.

2. Controlling Regional Legal Precedents

a) *The Eleventh Circuit's Decision in Engineering Contractors v. Metropolitan Dade*

Having the benefit of the Supreme Court's thinking in Croson and Adarand, the Eleventh Circuit addressed the constitutionality of programs providing for race-, ethnicity-, and gender-conscious measures for public contracts (M/WBEs) in Engineering Contractors Assoc. of South Florida, Inc. v. Metropolitan Dade County.³⁰

Applying the strict scrutiny standard required by Croson and Adarand to the race-based and ethnicity-based provisions, the District Court ruled that Metropolitan Dade failed to provide a "strong basis in evidence" to justify the measures and was likewise not narrowly tailored to remedy past or present discrimination. Applying an intermediate scrutiny standard to the gender-based provision, the District Court also found

²⁶ Id. at 507-508.

²⁷ Id. at 507.

²⁸ Id. at 500.

²⁹ Six years after its decision in Croson, the Supreme Court was again confronted with an equal protection challenge to a minority business program in Adarand Constructors, Inc. v. Peña, 515 U.S. 200 (1995) (Adarand III). This time, however, a DBE program enacted by the federal government was at issue, thus implicating the Fifth Amendment rather than the Fourteenth Amendment analysis required for the local (state) program in Croson. The program was ultimately upheld by the Tenth Circuit on remand in Adarand Constructors, Inc. v. Slater, 228 F.3d 1147 (10th Cir. 2000) (Adarand VII).

³⁰ 122 F.3d 895 (1997). The program at issue in Engineering Contractors had been upheld by the Eleventh Circuit applying pre-Croson Supreme Court precedent. Id. at 901.

“insufficient probative evidence” to support that measure.³¹ The Court of Appeals ultimately affirmed after extensive discussion of the evidence, finding that the District Court’s findings of fact were not clearly erroneous.³²

With respect to the statistical analysis relied upon by Metropolitan Dade, the Eleventh Circuit shared the conclusion of the District Court that the statistical discrepancies for minorities and for women revealed in the data were better explained by correlation to firm size than by discrimination.³³

The Court also rejected the “narrow tailoring” efforts by Metropolitan Dade, finding that the County appeared to institute race-conscious remedies without any serious consideration of possible race-neutral options, which is antithetical to the requirement for a narrowly tailored remedial program.³⁴

b) Webster Greenthumb v. Fulton County

Soon after the Engineering Contractors ruling, the U.S. District Court for the Northern District of Georgia applied that guidance to a constitutional challenge to Fulton County’s MFBE [Minority and Female Business Enterprise] program in Webster Greenthumb Co. v. Fulton County, Georgia.³⁵ As discussed below, the Court ultimately determined that Fulton County had not sufficiently demonstrated that its program passed constitutional muster under the “new” Croson standard, finding various problems with the statistical analysis proffered to support the program and determining that the program was not narrowly tailored – largely because race-and gender-neutral strategies were not employed initially (or concurrently).

In Webster, a White American-owned landscaping and tree removal company alleged that it lost public contracting opportunities with the County to Minority-owned businesses as a result of the MFBE program (as written and implemented) and challenged the program as unconstitutional.³⁶ The program itself had been initiated in 1992 after consideration of a 1990 research study (the Brimmer-Marshall Study) and open public hearings and was amended in 1994, following a disparity study conducted at the County’s request

³¹ *Id.* at 902.

³² *Id.* at 924, 929.

³³ *Id.* at 918 (“Based on the foregoing, the District Court concluded that the demonstrated disparities were better explained by firm size than by discrimination. In the District Court’s view, the few unexplained disparities that remained after regressing for firm size did not provide a strong basis in evidence of discrimination for [Black Business Enterprises] and [Hispanic Business Enterprises] and did not sufficiently demonstrate the existence of discrimination against WBEs in the relevant economic sector. We do not consider that view of the evidence to be an implausible one in light of the entire record, which is to say we do not find it to be clearly erroneous.”).

³⁴ *Id.* at 927 (“If a race-neutral remedy is sufficient to cure a race-based problem, then a race-conscious remedy can never be narrowly tailored to that problem. . . . Here, the County has clearly failed to give serious and good-faith consideration to the use of race and ethnicity-neutral measures to increase BBE and HBE participation in the County construction market.”).

³⁵ 51 F.Supp.2d 1354 (N.D. Ga. 1999).

³⁶ 51 F.Supp.2d at 1356-57, 1362.

(Dr. Boston's "Post-Disparity Study").³⁷ Both the 1992 and 1994 versions of the program utilized explicit Minority and female participation goals.³⁸

Following an overview of the legal standards established in Croson and the subsequent guidance in Engineering Contractors, including the two-pronged strict scrutiny evaluation (requiring a strong basis in evidence and narrow tailoring), the Court in Webster declared the Fulton County program unconstitutional.³⁹ In sum, the Court found the statistical bases offered by the County flawed and insufficient.

Though the Court determined that the program was not supported by a strong basis in evidence, it nonetheless addressed the narrow tailoring requirement and found the Fulton County program also lacking in that regard. First, it found that the County had failed to persuade the Court that "it has seriously considered race-neutral remedies." Second, the County did not properly break down the statistics among the various Minority groups, "randomly including" some ethnic or racial groups who may not have suffered from discrimination in the remedial program. Third, the Court found documents and testimony exposing questionable methods/practices of implementation to achieve Minority inclusion. Finally, the Court determined that there was not a meaningful "sunset" provision for the program.⁴⁰

c) *The Eleventh Circuit's Decision in Viridi v. Dekalb County School District*

In an unpublished 2005 opinion, the Eleventh Circuit ruled that the strict scrutiny standard also applies to aspirational, non-binding M/WBE goals programs because such goals programs are based on racial classification.⁴¹ The Supreme Court has not yet addressed this particular issue, so the Viridi ruling remains persuasive in this Circuit.

In Viridi, the school district conducted general research on the utilization of Minority businesses in district purchasing but notably did not conduct a disparity study.⁴² Relying on this research, the following program elements were recommended and adopted as policy:

[T]he Tillman Report recommended that the District (1) advertise bids and purchasing opportunities in newspapers targeting minorities, (2) conduct periodic seminars to educate minorities on doing business with the District, (3) notify organizations representing minority firms regarding bidding and purchasing opportunities, and (4) publish a "how to" booklet to be made available to any business interested in doing business with the District.

³⁷ Id. at 1357-58.

³⁸ Id.

³⁹ Id. at 1362-64, 1378, 1383.

⁴⁰ Id. at 1380-82.

⁴¹ Viridi v. Dekalb County School District, 135 Fed. App'x 262 (11th Cir., 2005).

⁴² Id. at 264 ("[T]he the Committee issued a report ("the Tillman Report") stating the Committee's impression that "[m]inorities ha[d] not participated in school board purchases and contracting in a ratio reflecting the minority make up of the community." The Tillman Report was based only on the Committee's "general feeling" that minorities were under-represented; there was no specific evidence of past discrimination, nor did the Committee make any factual findings regarding such discrimination.").

The Tillman Report also recommended that the District adopt annual participation “goals” for minority involvement. The recommended goals for contracts, purchases, and services were 15% for “Black Businesses,” 5% for “Female Businesses,” and 5% for “Other Minorities.” The Tillman Report included several statements to the effect that the actual selection process was to remain race neutral. It also emphasized that the “goals” were aspirational rather than mandatory and should not be taken as a call for preferential treatment.

* * * *

The [School] Board adopted the Tillman Report in March 1991. It subsequently began advertising contracting opportunities in the *Atlanta Journal-Constitution*, conducting quarterly seminars on how to do business with the District, and publishing the recommended handbook. In addition to these community outreach activities, the Board began implementing a minority vendor involvement program (“MVP”) in March 1991. The MVP’s stated goal was to “provide increased opportunities for blacks, women, and other minorities to engage in business activities within the School System.” It was intended to educate the public on how to do business with the District, monitor minority participation, and evaluate the effectiveness of the District’s strategies to increase minority involvement. The MVP adopted the minority participation goals outlined in the Tillman Report.⁴³

The new school district program was facially challenged by an architect of Asian descent who alleged he was denied an opportunity to bid on a series of SPLOST (Special Purpose Local Option Sales Tax) contracts due to the new program. The District Court granted summary judgment in favor of the school district.⁴⁴ The Eleventh Circuit Court reversed on appeal, however.

The Court first ruled that the District Court erred in not applying strict scrutiny to the school district program:

It is well settled that “all racial classifications imposed by government ‘must be analyzed by a reviewing court under strict scrutiny.’” *Grutter v. Bollinger*, 539 U.S. 306, 326, 123 S.Ct. 2325, 2337, 156 L.Ed.2d 304 (2003) (quoting *Adarand Constructors, Inc. v. Peña*, 515 U.S. 200, 227, 115 S.Ct. 2097, 2113, 132 L.Ed.2d 158 (1995)). To the extent that Defendants argue that the MVP did not contain racial classifications because it did not include set-asides or mandatory quotas, we note that strict scrutiny applies to *all* racial classifications, not just those creating binding racial preferences. The MVP includes racial classifications. It is therefore subject to strict scrutiny.⁴⁵

Applying strict scrutiny, the Court ruled that the school district goals program was unconstitutional because it was not narrowly tailored. Specifically, the Court reasoned that the school district failed to consider or

⁴³ *Id.* at 264-65.

⁴⁴ *Id.* at 267 (“Because the MVP did not direct government actors to withhold or confer benefits based on the race of the applicant, the District Court concluded that Viridi’s equal protection rights were not violated, and that the MVP was not subject to strict scrutiny.”).

⁴⁵ *Id.* at 267.

implement race-neutral policies to remedy any disparities found and also failed to provide an end-date for the goals program.

The MVP's racial goals are not narrowly tailored for two reasons. First, there is no evidence that the District considered race-neutral alternative means of tracking its activities to avoid unwitting discrimination. While narrow tailoring does not require exhaustion of every conceivable race-neutral alternative, it does require serious, good faith consideration of whether such alternatives could serve the governmental interest at stake. In the instant case, a number of race-neutral alternatives would be at least as effective as the MVP's percentage goals in helping the District track its activities to avoid unintentional discrimination. Because the state's proffered interest could be served equally well by race-neutral measures, the adoption of a racial classification is not narrowly tailored to achieving that interest.

The unlimited duration of the MVP's racial goals also demonstrates a lack of narrow tailoring. As the Supreme Court has stated, "race conscious ... policies must be limited in time." Grutter, 539 U.S. at 342, 123 S.Ct. at 2346[.]⁴⁶

It is important to note, however, that the Court's analysis regarding the application of strict scrutiny (and lack of narrow tailoring) appears limited to the aspirational goals portion of the school district's program. The goals program is expressly cited as the offending policy, see *supra*, and the Court also noted in a footnote that the outreach and tracking features of the program were not similarly problematic – and may even be considered race-neutral – even though they are essentially based on racial classification.⁴⁷

Again, decisions by the Eleventh Circuit or the District Courts therein (like Engineering Contractors, Virdi, and Webster) are particularly important when addressing/evaluating any M/WBE program implementation and administration that Palm Beach County may undertake pursuant to, or after completion of, this Study.

⁴⁶ *Id.* at 268 (citations omitted). The expressly court did not reach the compelling governmental interest prong of the strict scrutiny analysis. *Id.* ("As an initial matter, we are not at all convinced that the government interest identified by the District Court is compelling. However, we need not decide that issue, as it is clear that the MVP's race-based participation goals are not a narrowly tailored means of serving that interest.").

⁴⁷ *Id.* at 268 and fn. 8 ("In the instant case, a number of race-neutral alternatives would be at least as effective as the MVP's percentage goals in helping the District track its activities to avoid unintentional discrimination. . . . For instance, the District could simply have employed its outreach procedures and tracked the participation and success of qualified minority-owned businesses in the bidding process as compared to that of similar non-minority-owned firms.").

3. Other Relevant Case Law

a) *The Supreme Court's Decision in Students for Fair Admissions v. Harvard College*

The Supreme Court in 2023 issued its opinion in Students for Fair Admissions, Inc. v. President and Fellows of Harvard College,⁴⁸ which dealt with affirmative action in college admissions. The decision in Students for Fair Admissions is limited, for now, to college admissions programs that use race as a determinative factor for admission without basing such use on a real-world factual predicate. Though the opinion does not directly address affirmative action in public procurement, there are some aspects of the Court's decision that may apply to or influence future cases in that context, so a brief overview is offered here.

As an initial matter the Supreme Court cited, with approval, the jurisprudential framework that supports Disparity Studies and, by extension, appropriately designed and implemented M/WBE programs. In essence, the Court reaffirmed the legal infrastructure (including methodologies) that grants viability to Disparity Studies and enforceability to M/WBE and SBE (Small Business Enterprise) programs across the nation, with reference to Croson, Adarand, and their progeny.

Further, when the Court provided its reasoning for striking down the admissions programs/processes at Harvard and the University of North Carolina, it cited constitutional concerns or infirmities that either have no application in the public procurement context, or which have already been addressed methodologically as a result of prior federal appellate decisions.

On the issue of the "compelling state interest" (and supporting factual predicate), the Court in Students for Fair Admissions concluded that the schools' stated "diversity" aims: "(1) training future leaders in the public and private sectors"; (2) preparing graduates to 'adapt to an increasingly pluralistic society'; (3) fostering innovation and problem solving; (4) preparing engaged and productive citizens and leaders; and (5) enhancing appreciation, respect, and empathy, cross-racial understanding, and breaking down stereotypes[,]'" were insufficiently "coherent for purposes of strict scrutiny."⁴⁹ The Court focused its criticism on the immeasurability of these goals and the difficulty in assessing when such goals are achieved in ruling that this first prong of the strict scrutiny test was not met. In contrast, and as discussed in more depth in the Expanded Legal Analysis (Appendix B), the compelling state interests of remedying the present effects of past discrimination and of avoiding current discrimination in the context of governmental procurement are well-accepted in the existing case law.⁵⁰

On the issue of narrow tailoring, the Court in Students for Fair Admissions concluded that the schools' policies/programs are not sufficiently narrow, in large part because there is no express endpoint or

⁴⁸ 600 U.S. 181, 143 S.Ct. 2141 (2023).

⁴⁹ Id. at 214.

⁵⁰ See, for example, Croson, 488 U.S. at 492 ("It is beyond dispute that any public entity, state or federal, has a compelling interest in assuring that public dollars, drawn from the tax contributions of all citizens, do not serve to finance the evils of private prejudice.").

measurable benchmark that would signal that the program is no longer needed.⁵¹ This element of narrow tailoring has been an established part of public procurement case law for many years and express “sunset clauses” represent current best practices in this area.⁵² Also of note, is the Court’s focus on the sometimes-arbitrary nature of racial and ethnic designations.⁵³ Accordingly, programs ought to be designed to be as inclusive as possible of all racial and ethnic populations and narrowly tailored to such sub-categories. As an initial matter, jurisdictions should track ethnic sub-category data as soon as practicable in deference to this concern. Once the data is more readily available, due to improved data collection, jurisdictional policies can be narrowly tailored to such groups.

C. Conclusion

The use and utility of disparity studies started with Croson but certainly did not end there. The federal courts, including the Eleventh Circuit, continued to develop the law surrounding disparity studies, often refining relevant issues by expanding on the reasoning provided by the Croson Court initially. The courts have also subsequently evaluated and established acceptable methodological elements for such studies, which G&S discusses at greater length in the Expanded Legal Analysis (Appendix B).

⁵¹ See Students for Fair Admissions v. Harvard, 143 S. Ct. 2141, 2218 (2023).

⁵² See *infra*, Expanded Legal Analysis (Appendix B), section A.6. (“Finally, ‘review’ or ‘sunset’ provisions are strongly suggested components for an M/WBE program to guarantee that remedies do not out-live their intended remedial purpose.”).

⁵³ See Students for Fair Admissions v. Harvard, 143 S. Ct. 2141, 2168 (2023).

IV. PURCHASING POLICIES, PRACTICES, AND PROCEDURES REVIEW

A. Introduction

This chapter is designed to review the written policies, practices, and procedures of Palm Beach County ("County") with respect to purchasing and contracting, including related programs or efforts to enhance the inclusion of Small, Minority, and Women Business Enterprises (S/M/WBEs).

Underlying this policy review is an understanding that written policies, practices, and procedures may not always be consistently administered as there is often room for interpretation or discretionary implementation. Accordingly, policy interviews are intended to identify any deviations, differing interpretations, or uneven implementation of policies that might adversely affect contract participation of small businesses, including those owned by minorities and women.

The Executive Summary of Findings and Recommendations summarizes key findings about the County's policies, practices, and procedures, and also provides formal recommendations for improvements to the overall procurement process and practices that might facilitate greater achievement of its public policy objectives and goals.

B. Document Review and Personnel Interviews

In preparation for the policy interviews, G&S reviewed, among other materials:

- Florida State Statutes relating to contracting and procurement
- County Ordinances
- County procurement policy and procedures manual ("PPM") and related documents
- County website pages, including the Purchasing, Office of Equal Business Opportunity (OEBO), Facilities Development & Operation (FDO), Engineering & Public Works (EPW), Environmental Resource Management (ERM), Water Utilities Department (WUD) and Airport webpages
- County budget documents
- Other publicly available resources relating to County procurement

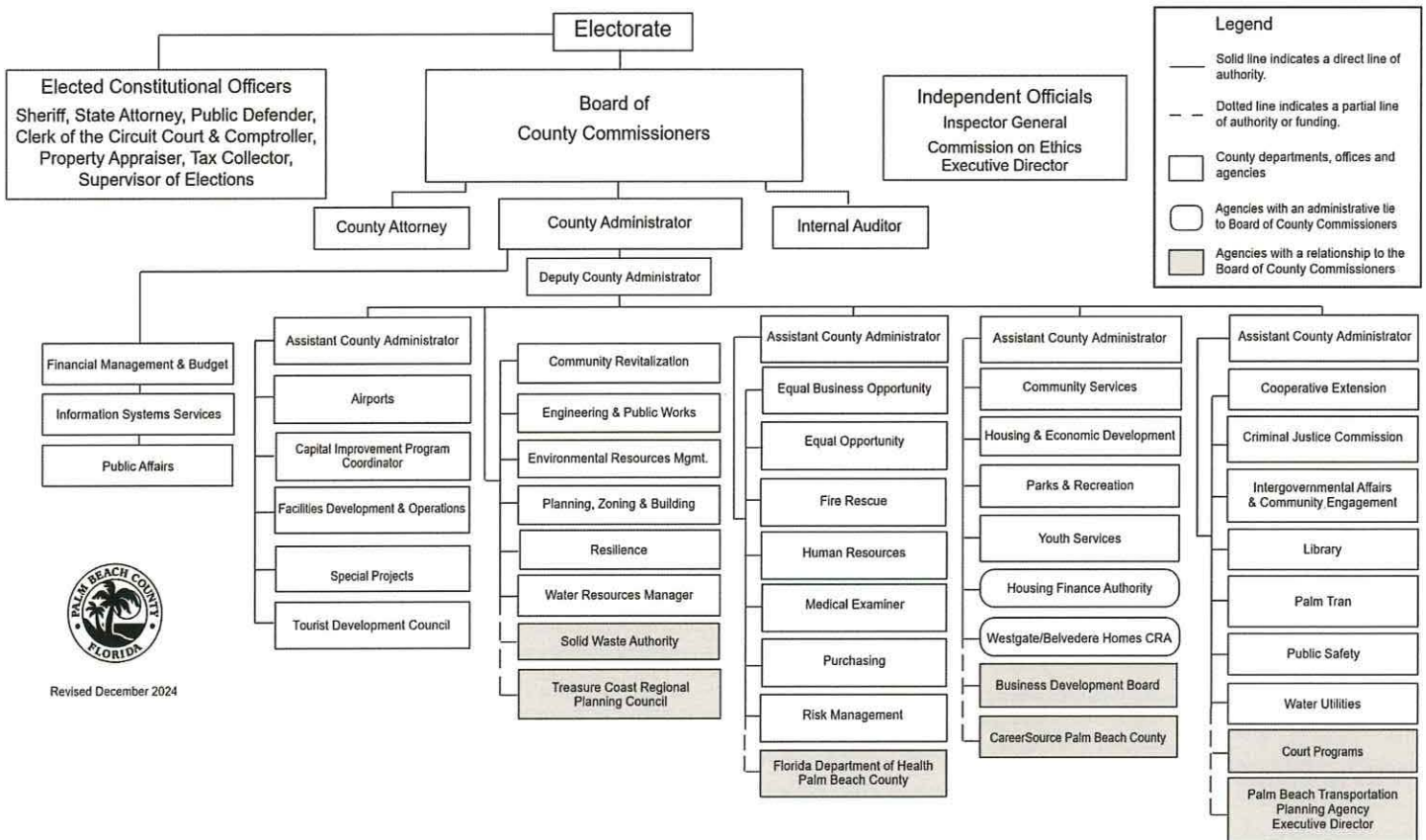
G&S conducted policy interviews from August through October of 2024 with decision-makers and officials regularly engaged in purchasing and contracting activities for the County. Included in these interviews were County personnel in Purchasing, Housing & Economic Development, Airports, Engineering and Public Works, Palm Tran (transit), Legal, Water Utilities, Facilities Development & Operations, Environmental Resources Management, and the OEBO.

C. Overview of County Purchasing

1. Organizational Chart

The Organizational Chart in Figure 1 below shows the overall County government structure, including the Purchasing Department.⁵⁴

Figure 1: Palm Beach County Organizational Chart
Palm Beach County 2025 Disparity Study



Source: Palm Beach County

⁵⁴ The Organizational Chart shown represents the County structure at the time of the Study.

2. Formal and Informal Bid Thresholds

The County's competitive bidding thresholds during the Study Period were as follows in Table 8.⁵⁵

Table 8: Competitive Bidding Thresholds and Signature Authority
Palm Beach County 2025 Disparity Study

Dollar Amount of Purchase	Requirements
Below \$100,000	Request for Quotation (RFQ): an informal procurement method where price is the determining factor when selecting a vendor. Request for Submittal (RFS): an informal procurement method where established criteria, in addition to price, are considered.
\$100,000 and above	Invitation for Bid (IFB): a formal procurement method used when price is the determining factor when selecting a vendor. Request for Proposal (RFP): a formal procurement method used when established criteria, in addition to price, are considered. Awards are based on the evaluation of a Selection Committee.
\$200,000 & above	Contracts that require Board Approval

Source: County Code of Ordinances § Sec. 2-54(a) – Source Selection. Vendor's Guide to Doing Business With Palm Beach County, 2017

The County has limited use of procurement cards for items such as airplane tickets and conference registration. The County is planning to expand procurement card usage, but that usage has not been determined as of the date of this report.

Decentralized Purchase Order (DPO) is a contracting method used by County Departments for purchases valued under \$5,000 when the goods or services are not available through an existing contract. County Departments are required to get two or three quotes depending on the size of the DPO and approval from the County Resource Manager is required when applicable. If S/M/WBEs are available to provide the good or service (as listed in the County's Vendor Directory), the S/M/WBE must be contacted for a quote. The SBE and Local Preferences (discussed below) applies to DPOs.

⁵⁵ New bidding thresholds were established on November 16, 2024.

D. Professional Services

The Purchasing Department does not issue solicitations for Consultants Competitive Negotiation Act (CCNA, F.S. § 287.055) professionals. Instead, these solicitations are issued by the County's five construction departments: Airports, Engineering & Public Works, Environmental Resources Management, Facilities Development and Operations, and Water Utilities. CCNA covers professionals who provide engineering, architecture, surveying and mapping, and landscape architecture services.

For construction projects requiring CCNA services, the CCNA statute does not apply if the estimated basic construction cost of the project is below \$325,000.⁵⁶ For CCNA services involving studies or planning activities, the statute is inapplicable when the fee for professional services falls below \$35,000.⁵⁷

The CCNA competitive selection process is summarized as follows:

1. Short List Committee reviews proposals from CCNA certified firms, evaluates qualifications, and shortlists a minimum of two more firms than the number to be selected.
2. Final Selection Committee interviews, evaluates, and ranks the short-listed firms.
3. Post notice of recommended award.
4. Board of County Commissioners (BCC) approves or does not object to the ranking.
5. Staff negotiate the contract with highest ranked firm.
6. Contract award.⁵⁸

A team may earn up to three points for the project based on the total cumulative percentage of work carried out by personnel located within the team's Palm Beach County offices. These points can be awarded for work performed by the prime consultant, one or more subconsultants, or a combination of both.⁵⁹

An OEBO representative is a member of the permanent Contract Review Committee assigned to review and approve/reject specific additional services against Professional Services Agreements and change order requests against construction contracts from Lead and User Departments.⁶⁰ An EBO representative is also a member of the CCNA Short and Final Selection List Committee.⁶¹

⁵⁶ Palm Beach County, Selection of Professional Engineers, Architects, Landscape Architects, Land Surveyors and Mappers, PPM Cw-O-048.

⁵⁷ Ibid.

⁵⁸ Ibid.

⁵⁹ Ibid. All consultants and/or sub-consultants must submit, with their proposal: 1) a Business Tax Receipt issued by the County Tax Collector to verify the firm's permanent place of business and 2) a written statement ("letter of intent"), indicating the percent participation that each consultant and/or sub-consultant of the team is proposing to perform in the County.

⁶⁰ Palm Beach County, Change Order and Consultant Services Authorization Authority for Construction, Engineering and Architectural Contracts, PPM # CW-F-050.

⁶¹ Palm Beach County, Selection of Professional Engineers, Architects, Landscape Architects, Land Surveyors and Mappers, PPM #CW-O-048.

E. Construction

Under the County's Purchasing Code, the authority for construction-related procurements is delegated to the following Departments: Facilities Development and Operations (FDO), Department of Airports (DOA), Engineering and Public Works (EPW), Environmental Resources Management (ERM), and Water Utilities Department (WUD).⁶² Table 9 below shows which County Construction departments use which construction delivery methods.

Table 9: Palm Beach County Construction Delivery Methods
Palm Beach County 2025 Disparity Study

Delivery Method	FDO	DOA	EPW	ERM	WUD
Design-Bid-Build	X	X	X	X	X
Construction Management at Risk	X	X			
Design/Build					X
Per Unit Cost		X	X	X	X
Annual Trade Contracts	X		X		

Source: Palm Beach County, Overview of County Construction Processes, May 2024

For the selection of Construction Managers and Design Build firms if there is still a tie amongst first place first getters, "then SBE (or M/WBE or DBE) participation will be used as a tie breaker."⁶³

F. Exemptions from Competitive Bidding

The County's Purchasing Code provides the following exemptions to the requirement of competitive bidding: Ordinance (some details omitted):

- Agreements between the Board and nonprofit organizations or other governments.
- Procurement of dues and memberships in trade or professional organizations; subscriptions to periodicals; advertisements; postage; utility services; copyrighted materials; professional medical services; authorized hospitality expenses; fees and costs of job-related seminars and training, including materials provided with, or as an integral part of, that training; and, admission fees for amusement parks and entertainment activities included in County recreational programs.
- Presenters, lecturers, and facilitators for County sponsored programs.
- Recreational instructors and sports officials.
- Procurements for Constitutional officers.
- Selection of professional services that are governed by the provisions of the CCNA.
- Real property interests.

⁶² Palm Beach County Code Section 2-53(f).

⁶³ See, e.g., Palm Beach County, Water Utilities Department (WUD) Selection of Design-Build Firms, PPM # CW-O-094. Final Selection Committee Procedures; Facilities, Development & Operations (FDO) Selection Of Construction Management (CM) Firms or Program Management Firms, PPM # CW-O-092, Final Selection Committee Procedures.

- h. Concessions.
- i. Vending machines.
- j. Goods or services purchased with donations, gifts or bequests containing restrictions that would interfere with or prevent the application of the requirements of the Purchasing Code.
- k. Goods purchased with petty cash.
- l. Decentralized Purchase Orders.
- m. Labor negotiation services, legal services, expert witnesses, court reporter services.
- n. Insurance policies which cost less than the Mandatory Bid or Proposal Amount.
- o. Artwork.
- p. Full or part-time contractual employees of the Board.
- q. Event specific stage production or programming.
- r. County sponsorships or the solicitation of sponsorships.
- s. Golf tee time advertising and sales services for County golf courses.
- t. Bond underwriters.
- u. Grant funded training, events, activities, and grant payments.⁶⁴

County purchasing procedures call for the consideration of the County's SBE Preference and the Local Preference by County Departments when making exempt purchases.⁶⁵

G. Bonding, Insurance and Prompt Payment

1. Bonding

Florida Statutes mandate that a payment and performance bond be provided for the construction or renovation of any publicly owned facility.⁶⁶ However, the requirement for a bond may be waived if a county, political subdivision, or public authority enters a contract valued at \$200,000 or less.

The County Purchasing Ordinance provides for a review of bonding requirements and bonding assistance.⁶⁷ The County also approved a bond waiver program for construction projects of \$200,000 or less in 1989.⁶⁸ Under this policy certain projects under \$200,000 do not require a bond or a bond waiver.

⁶⁴ Recent amendments added the following to the list of exemptions: grant funded payments under the federal micro purchase; pilot programs for fuel/energy; pharmaceuticals and medical supplies to be administered by County departments; and enhancements to proprietary software. See Purchasing / Facilities Development & Operations (FDO), Revisions to the County's Purchasing Code (PPT), February 15, 2024.

⁶⁵ Palm Beach County Purchasing Department, Purchasing Policy and Procedures, PPM #: CW-L-008, Section III.C. (March 20, 2018).

⁶⁶ Fl. Stat. § 255.05.

⁶⁷ Palm Beach County Ordinances, §. 2-80.27(1)(a). - Affirmative procurement initiatives ("The County Administrator shall establish a work group of County personnel to research, consider, and recommend a variety of 'best practice' models from the State of Florida and across the nation for providing bond waivers and other forms of bonding assistance to S/M/WBE firms.").

⁶⁸ Resolution R-89-1178 June 13, 1989.

- a. Projects with a value of less than \$50,000.
- b. Projects in which there are no subcontractors or suppliers greater than \$2500.
- c. Projects with durations of 30 days or less and where the contract does not provide for progress payments.
- d. Projects less than \$200,000 which are awarded through the Construction Manager continuing services contracts provided the Construction Manager is bonded for single projects greater than \$10,000,000⁶⁹

The program charges each project 2% to be placed into a Bond Reserve fund to cover additional costs incurred by the contracting department due to the default of any unbonded contractors under this program. The bond waiver program also places limits on the number of bond waivers a firm can receive at any one time.

Staff interviews indicate that there have not been many complaints about bonding requirements, nor has there been significant vendor demand for the bond waiver program. Vendor experience with County bonding requirements is discussed in the Anecdotal chapter as well.

2. Insurance

County procurement staff did not report many concerns of vendors about insurance requirements being too high. In instances where there were concerns, they tended to be resolved in discussions between user departments and risk management. One complaint from vendors reported to staff is that they had to obtain insurance even if they were not awarded the contract. However, County staff indicated that this is not true, The insurance must be in place at the time of contract approval by the County Board and does not have to be in place to bid on a contract. Vendor experience with County insurance requirements is discussed in the Anecdotal chapter as well.

3. Prompt Payment

The State of Florida's prompt payment statute that applies to local governments and agencies went into effect in 1989.⁷⁰ Construction payments are due twenty-five business days after the date on which the payment request is stamped.⁷¹ A local governmental entity can withhold from each progress payment on construction an amount not to exceed 10% of the payment as retainage until 50% completion of such services.⁷² After the 50% threshold is reached, retainage must be reduced to 5%.⁷³ In 2020 retainage was reduced to 5% over the life of the contract. The contractor must pay subcontractors and suppliers within 10 days after the contractor's receipt of payment.

⁶⁹ Palm Beach County, Bond Waiver Program, PPM#: CW-F-01, April 3, 2013.

⁷⁰ Fl. Stat. § 218.735. Timely payment for purchases of construction services.

⁷¹ Fl. Stat. § 218.735(1)(a).

⁷² Fl. Stat. § 218.735(8)(a).

⁷³ Fl. Stat. § 218.735(8)(b).

The bond waiver program discussed above also allows for joint checks made payable to the prime and the corresponding subcontractor/supplier.⁷⁴ Checks in this program are delivered to the prime for distribution.

Staff interviews indicated that most prompt payment issues were due to inadequate paperwork submission by vendors. It is noteworthy, however, that there is a ten-day notice requirement for the County when disputing an invoice for inadequacy:

Within ten (10) days of the County's receipt of any payment request or invoice from a contractor or vendor, the Originating Department shall notify such contractor or vendor in writing regarding any and all deficiencies in its payment request or invoice that will prevent prompt processing and issuance of payment. To the extent there is an undisputed portion of the invoice that can be paid, the County shall proceed with prompt payment of that portion of the invoice.⁷⁵

Vendor experience with prompt payment by the County is discussed in the Anecdotal chapter as well.

H. Vendor Registration and Prequalification

All vendors providing goods or services to the County must be registered through Vendor Self Service (VSS), a module of Advantage, where vendors can register and access County solicitations for all goods and services. VSS required vendor information includes, but is not limited to, payment addresses, an email address, telephone and fax numbers, and a Federal Identification Number (FEIN). All vendor files that are "inactive" for a period of three consecutive years are purged.⁷⁶

The County Code allows for the prequalification of suppliers for specific types of goods and services.⁷⁷ Several County departments have, accordingly, established prequalification lists, including but not limited to FDO and Purchasing.⁷⁸ These lists often are established and maintained in furtherance of awarding annual contracts, though there is no express written policy linking prequalification to annual contracts.

Procedurally, firms seeking an award of an annual contract submit a "Qualification Application" with the soliciting department. One aspect of the qualification application may be a minimum experience requirement (see Table 10, below); these experience requirements are not set forth in the County policies

⁷⁴ Palm Beach County, Bond Waiver Program, PPM#: CW-F-01, F. Joint Check Procedure for Subcontractors/Suppliers

⁷⁵ Palm Beach County, PPM#: CW-O-043, 5(e); Palm Beach County Ordinances, § 2-80.26(8).

⁷⁶ Palm Beach County, Purchasing Department, Vendor's Guide to Doing Business with Palm Beach County, pg. 2 ("In complying with the State of Florida's records retention schedule, all vendor files that are 'inactive' for a period of three (3) consecutive years will be purged. 'Inactive' means that the vendor has not provided goods or services to Palm Beach County within a period of three (3) consecutive years.").

⁷⁷ County Code of Ordinances § Sec. 2-54(f)(8); PPM#: CW-L-008, Section III(G)(8); PPM#: PA-O-002, Section III(E).

⁷⁸ Of additional note, specific Airport procurements may require prequalification and/or background checks.

or ordinances but have been historically used by County departments to ensure adequate experience/capacity, according to staff. If the County's qualification requirements are met, the firm is added to the annual contract pool established by the soliciting department.

Table 10: Summary of Annual Contract Experience Requirements
Palm Beach County 2025 Disparity Study

Type of Annual Contract	# of Years Licensed	\$\$ of Completed Projects in the Past # of Years
1. Asbestos Abatement	5	\$100,000 in each of the past 3 years
2. Asphalt	5	\$150,000 in each of the past 3 years
3. Demolition	5	\$500,000 in each of the past 3 years
4. Electrical	5	\$300,000 in each of the past 3 years
5. Flooring	5	\$150,000 in each of the past 3 years
6. HVAC	5	\$500,000 in each of the past 3 years
7. IAQ Remediation	3	\$100,000 in each of the past 3 years
8. Low Voltage	3	\$300,000 in each of the past 3 years
9. Minor Construction	5	\$300,000 in each of the past 3 years
10. Overhead Doors	5	\$300,000 in each of the past 3 years
11. Painting and Weatherproofing	5	\$300,000 in each of the past 3 years
12. Plumbing	3	\$100,000 in each of the past 3 years
13. Roofing	5	\$300,000 in each of the past 3 years
14. Sports Field Lighting	7	\$300,000 in each of the past 5 years

Source: Palm Beach County

A few MBEs have complained to staff about these experience requirements. These requirements can be particularly burdensome if a business closes and is reestablished under a new name.

All County solicitations are advertised on the vendor self-service (VSS) website and on Channel 20; the Construction Departments are also required by state statute to advertise construction projects \$200,000 or greater in the local newspaper. Purchasing creates a list of purchases each year and the dollar value.⁷⁹ OEBO organizes a "Hardhats and Suits" outreach event with the County construction departments.⁸⁰ The Environmental Resources Management (ERM) department posts solicitations in VSS, Channel 20 and the Bid notice is published on the ERM website and in the Local News Paper two Sundays after the solicitation's advertisement date.⁸¹ Each department present their major projects for the next one to two years.

⁷⁹ Palm Beach County Purchasing, What Did We Order Last Year?

<https://discover.pbcgov.org/purchasing/Pages/Last-Year.aspx>.

⁸⁰ See, e.g., 2024 ENG Hardhats and Suits Presentation (PPT 2024).

⁸¹ As required by Florida Statute 255.0525.

I. Selected Procurement Practices

1. Outreach

OEBO hired a full-time Outreach/Public Information Coordinator in 2020 (Q3). OEBO hosted, sponsored, and/or participated in 10 outreach events in FY 2020 (targeted events and general events), 22 events in FY 2021, 39 events in FY 2022, and 13 in FY 2024 (Q1).⁸² OEBO also produced during the Study Period a quarterly newsletter, *The Enterprise*, which was re-launched in 2019 to give potential vendors tips on doing business with the County, cover different aspects of the County's S/M/WBE programing, and feature local business "success stories," among other topics.

2. Debriefing

Upon request, the OEBO offers debriefings to any respondent or bidder. These debriefings include a review of the bid response, pricing, and other supporting documents.

3. Contract Sizing

The County regularly reviews solicitations for opportunities to break down projects into smaller, more manageable components, sometimes by geographic region. This approach has shown success in certain cases, such as with lawn maintenance contracts. However, in some instances, staff reported that breaking down projects led to too few bidders or bids that were priced too high. Other staff noted that certain projects were too complex to be divided into separate components or remained bundled to simplify administration. There were also cases where projects were not broken down, yet an MBE still won the contract.

4. State Contracts

The County has used state contracts and cooperative contracts, in particular, for the purchase of furniture. M/WBE firms are identified as such on Florida state contracts, but it is self-certification. The County does not specifically track the extent to which self-certified firms with the State also certify with the County; staff shared that the County merely confirms State CCNA certifications. The County Purchasing PPM provides for a review of piggybacking to determine if there are no certified S/M/WBE vendors that can provide the service.⁸³ Staff reported that the State furniture contract is a significant success story as the County was able to get two County SBEs added to the State Contract.

⁸² Palm Beach County OEBO Final Report, FY 2019-FY 2022, pgs. 45-48; OEBO Final Report, FY 2023 and 2024 (Q1), pgs. 24-25. Notably, the report does not include the outreach events for FY 2023 (see pg. 24).

⁸³ Palm Beach County Purchasing Department, Purchasing Policy and Procedures, PPM #: CW-L-008, Section III.G.5 Piggyback Purchases. (March 20, 2018).

5. Bid Protests and Litigation

County staff noted that the EBO program has been a leading source of bid protests, especially within the construction sector. Most of these protests were attributed to misunderstandings by contractors about compliance with required documentation. When the EBO Ordinance was first implemented, bid protests were more frequent—and overwhelmingly centered around bidders’ failure to submit properly completed Schedule 1 & 2 forms/documentation. In response, the County provided additional guidance during pre-bid meetings to address these issues. County staff reported that adding the sample EBO schedules to the solicitation package helped vendors to fill out the Schedule 1 and 2s correctly. To date, the legality of the EBO program has not been challenged in any litigation.

J. Equal Business Opportunity Ordinance

Prior to the current EBO Ordinance, the County had an SBE program established in 2002. The County had an aspirational goal of 15% SBE participation in all areas of procurement, but it was not mandatory.⁸⁴ There were no M/WBE subcontractor goals, as is currently the case and discussed below. The SBE Ordinance was amended in 2008 to add a sheltered market program. The County conducted a disparity study in 2017.⁸⁵ The County addressed the study findings and additional evidence collected during the post-study policy deliberation phase with a new Equal Business Opportunity (“EBO”) Ordinance that was enacted in 2018.⁸⁶

K. Certification

A firm will not qualify for selection consideration as a County S/M/WBE unless it is certified by the Office of EBO by the solicitation due date.

1. M/WBE Certification

The County defines an M/WBE to mean:

A firm that is certified as either a minority business enterprise or as a women business enterprise for purposes of the EBO Program as being at least fifty-one (51) percent owned, managed, and controlled by minority group members and/or women of legal majority age that are lawfully residing in, or are citizens of, the United States or its territories, that is ready, willing, and able to sell goods or services that are purchased by the County, and that meets the Significant Business Presence requirements as defined herein. In order to be eligible for participation in S/M/WBE APIs, the M/WBE firm shall be *currently certified as being in compliance with the size standards* as reflected in the PPM, and as having satisfied all eligibility requirements to participate in the EBO Program. Unless otherwise stated, the term MBE as used in this Program is not inclusive of women-owned business enterprises (WBE).⁸⁷

⁸⁴ Palm Beach County, Ord. §§ 2-80.23(A) (2002).

⁸⁵ Mason Tillman, *Palm Beach County Disparity Study, Final Report*, December 2017.

⁸⁶ Ord. No. 2018-021, adopted October 16, 2018.

⁸⁷ Palm Beach County Ordinances, Part C, Sec. 2-80.21. – Definitions.

Minorities are defined as:

African Americans, Hispanic Americans, Asian Pacific Americans, and Native Americans legally residing in, or that are citizens of, the United States or its territories, as defined below:

African Americans: Persons with origins in any of the black racial groups of Africa.

Hispanic Americans: Persons of Mexican, Puerto Rican, Cuban, Spanish, or Central and South American origin.

Asian Pacific Americans: Persons having origins in any of the original peoples of East Asia, Southeast Asia, the Indian subcontinent, or the Pacific Islands.

Native Americans: Persons that are members of a federally recognized Indian tribe or that have no less than one-sixteenth percentage origin in any of the Native American Tribes, as recognized by the U.S. Department of the Interior, Bureau of Indian Affairs and as demonstrated by possession of personal tribal role documents.⁸⁸

Women Business Enterprise (WBE) means:

Any legal entity, except a joint venture, that is organized to engage in for-profit transactions, that is certified for purposes of the EBO Program as being at least fifty-one percent owned, managed, and under the control of one (1) or more non-minority women individuals of legal majority age that are lawfully residing in, or are citizens of, the United States or its territories, that is ready, willing, and able to sell goods or services that are purchased by the County, and that meets the domicile and Significant Business Presence requirements as defined herein.⁸⁹

For the period April 2018-2028 the County has an interlocal certification agreement with the City of West Palm Beach and the School District of Palm Beach County.⁹⁰ Per this agreement, the agencies collect the same information, although their certification criteria may differ in some respects. MBEs certified only by the State do not qualify for selection considerations under the County's EBO Program (e.g., evaluation preferences or contract goals). However, State certification as an MBE will be given selection consideration as required by the CCNA Statute.⁹¹

⁸⁸ Ibid.

⁸⁹ Ibid.

⁹⁰ Interlocal Agreement between Palm Beach County, the City of West Palm Beach and the School Board of Palm Beach County for the Certification of Small and/or Minority/Women Business Enterprises. April 10, 2018.

⁹¹ Palm Beach County, Engineering and Public Works, Selection of Professional Engineers, Architects, Landscape Architects, Land Surveyors and Mappers, PPM #: CW-O-04.

2. SBE Certification

The County definition for SBE is:

A corporation, partnership, sole proprietorship, or other legal entity for the purpose of making a profit that:

(1) is independently owned and operated by individuals legally residing in, or that are citizens of, the United States or its territories

(2) is currently certified as having annual revenues that satisfy S/M/WBE size standards on an industry specific basis (i.e., Construction, CCNA Professional Services including Architectural and Engineering Design firms, Professional Services, Goods, and Other Services) that are reflected in the PPM; and

(3) is domiciled in Palm Beach County and satisfies the Significant Business Presence and other eligibility requirements for participation in the EBO Program as defined herein.⁹²

Firms are certified in a particular work category, and the owner must hold a license in that category.

During the Study Period, the County's annual gross revenue size standards for SBEs were:

1. Construction Services, \$9,000,000
2. Professional Services procured pursuant to the CCNA statute, \$5,000,000
3. Non-CCNA Professional Services, \$4,000,000
4. Goods, \$5,000,000
5. Other Services, \$4,000,000⁹³

These limits are then averaged over the previous three most recent years, or if in business less than three years, averaged over the duration of the provider's existence.

In March 2024, the SBE size standards were amended to:

1. Construction: \$13 million
2. CCNA Professional Services: \$7 million
3. Non-CCNA Professional Services: \$5.7 million
4. Goods: \$7 million
5. Other Services: \$5.7 million⁹⁴

The amendment also allows firms that graduated while working on awarded project(s) with S/M/WBE participation to continue to count towards the project goals until the contract ends.

⁹² Palm Beach County Ordinances, Part C, Sec. 2-80.21. – Definitions.

⁹³ Ibid.

⁹⁴ Ibid. Ordinance No 2024-06.

County Ordinances provide that a firm that graduates can reapply. Applications for S/M/WBE certification can be submitted following the expiration of the two-year period immediately after graduation. This certification will only be granted if the S/M/WBE firm's annual revenues have fallen below the small business size standards for the relevant industry for two consecutive years after the initial post-graduation period.⁹⁵

3. Geographic Scope

County Ordinances define the program's relevant market based on the 2017 County disparity study, which identified Palm Beach County as the applicable market area.⁹⁶

The County Ordinances define Significant Business Presence in the relevant market area:

That in order to qualify for participation as an S/M/WBE firm in the EBO Program, the initial designated street address of the S/M/WBE firm's principal office...must be located within Palm Beach County, or the firm must have a significant business presence for at least one (1) year within Palm Beach County, defined as: an established place of business in Palm Beach County, from which at least fifty (50) percent of its total full-time, part-time and contract employees are domiciled and regularly based in Palm Beach County, and from which a substantial role in the S/M/WBE's performance of a Commercially Useful Function on the County contract is conducted. A location utilized solely as a post office box, mail drop or telephone message center or any combination thereof, with no other substantial work function, shall not be construed to constitute a significant business presence.⁹⁷

4. Counts of Certified Firms

Palm Beach County maintains an online directory of certified firms as part of the County vendor directory.⁹⁸ The directory can be searched by certification type, commodity/service, address, and contact information. Table 11 on the next page shows the counts of EBO certified firms in August 2024.

⁹⁵ Ibid.

⁹⁶ Ibid.

⁹⁷ Ibid. Outside of the Study Period (in 2025), the requirement was redefined to provide eligibility if one or more employee(s) of the firm is regularly based in the County.

⁹⁸ <https://www.pbcgov.org/pbcvendors>.

Table 11: Counts of EBO Certified Firms, 2019-2023
Palm Beach County 2025 Disparity Study

Business Classification	Number
S/MBE (Small Minority)	292
S/WBE (Small Women)	116
S/M/WBE (Small Minority Women)	188
SBE (Small, non-MWBE)	426
TOTAL	1022

Source: Palm Beach County EBO Certification 2019-2023, OEBO

L. Goals

1. Overview

Table 12 below shows the County's initial aspirational MBE and WBE Goals in the EBO Ordinance.

Table 12: County Initial Aspirational MBE, WBE Goals
Palm Beach County 2025 Disparity Study

Procurement Categories	MBE	WBE
Construction Prime Contracts	28%	13%
Construction Subcontracts	24%	14%
Professional Services Prime Contracts	23%	19%
Professional Services Subcontracts	25%	21%

Source: Equal Business Opportunity Ordinance

These aspirational goals were based on the 2017 Study and have not changed since the Ordinance was originally passed. It is anticipated that revised aspirational goals will be set using the results of the current Study.

2. Project Goal Setting Process

The Goal Setting Committee (GSC), established in 2019, sets S/M/WBE goals for the EBO Program, and determines contract goals based on industry categories, vendor availability, project-specific characteristics, and M/WBE utilization. The GSC also decides which Affirmative Procurement Initiatives (APIs) apply to various contracts.

The County EBO Ordinance provides that the GSC is composed of the Director of the Office of EBO, the Director of Contract Development and Control, the Director of Purchasing, the Director of FDO, the County Attorney, and the Director of the Originating Department, or designees of these individuals.⁹⁹ The GSC

⁹⁹ Palm Beach County Ordinances, Part C, Sec. 2-80.21. – Definitions. Goal Setting Committee.

generally meets twice a month. GSC meetings offer advance notice of upcoming projects and give participants an opportunity to learn about project specifics. The information shared helps participants in forming teams and preparing solicitation responses.

By ordinance, there is a minimum mandatory SBE project goal of 20% on County contracts. There may also be M/WBE goals set on the project. M/WBE goals are not placed on every project. SBE goals are also set more often on multi-trade projects and SBE preferences, discussed below, on single trade projects. Proposed subcontractor goals are based on the registered firms in the County Purchasing vendor database. Goals are determined by looking at firms certified in relevant trade categories, with the denominator being all registered vendors in the trade category in the vendor database located in the relevant geographic marketplace of Palm Beach County.

Some departments go through the steps of calling firms listed as available for particular work types in advance to determine compatibility and interest in serving as subcontractors on particular projects to make sure the proposed goals are reasonable. Some departments also look at what areas the 2018 disparity study emphasized as areas of disparity. They also work with project managers to review the feasibility of a goal before submitting the proposed goal to the GSC.

The County did apply project goals during the COVID pandemic. However, project goals are not applied to emergency purchases, and many more purchases were classified as emergencies during the pandemic.

Emergency Purchase means a procurement made in response to a need when the delay incident to complying with all governing rules, regulations, or procedures would be detrimental to the interests, health, safety, or welfare of the County. . .

The Director of Procurement, upon receipt of written verification of the emergency circumstance by the Director of the County Department or Designee, may authorize emergency purchases. Emergency purchases must meet the definition provided for in Section 2-52 above. Emergency purchases in which the County is to expend or to reimburse an amount of two hundred thousand dollars (\$200,000.00) or more per annum shall be approved by the Board. However, in emergency circumstances where approval by the Board cannot be obtained in a timely manner, the Director of Procurement may authorize a purchase(es) of two hundred thousand dollars (\$200,000.00) or more provided that said purchase(es) and expenditure(s) of funds shall be presented to the Board for ratification as soon as possible following signature or approval by the Director of Procurement.¹⁰⁰

County staff reported that this classification of purchases as emergencies applied more to goods than to services during the pandemic.

The County also does not set subcontractor goals on projects with County economic development incentives or on state-funded projects.¹⁰¹ S/M/WBE goals are not set on projects with federal funds that have different

¹⁰⁰ Palm Beach County Ordinances, § 2-52; 2-54(f)(4).

¹⁰¹ Fl Stat. § 255.0992.

program limitations (for example, federally funded airport projects with DBE goal requirements). Prime contractors are required to obtain prior written approval from the OEBO, with justification, before substituting another subcontractor for any designated S/M/WBE subcontractor to perform any scope of work, or for any other reason.

M. Waivers and Good Faith Efforts

There are three types of waivers for projects goals:

- (1) department pre-bid waivers, where departments do not think a proposed goal is feasible;
- (2) good faith efforts waivers, where bidder cannot meet the goal; and
- (3) post-bid waivers, where an intended S/M/WBE subcontractor is no longer available and cannot be replaced.

- The County EBO Ordinance provides that the methods of complying with Good Faith Efforts include the following:
- Documentation of efforts made toward achieving the SBE or M/WBE Program Goals (e.g., solicitations of bids/proposals/qualification statements from all qualified SBE firms or M/WBE firms listed in the Office of EBO's directory of certified SBE or M/WBE firms);
- Correspondence from qualified SBE or M/WBE firms documenting their unavailability to perform SBE or M/WBE contracts;
- Documentation of efforts to subdivide work into smaller quantities for subcontracting purposes to enhance opportunities for SBE or M/WBE firms;
- Documentation of a Prime Contractor's posting of a bond covering the work of SBE or M/WBE Subcontractors;
- Documentation of efforts to assist SBE or M/WBE firms with obtaining financing, bonding or insurance required by the respondent or bidder; and
- Documentation of consultations with trade associations and consultants that represent the interests of SBE and/or M/WBEs to identify qualified and available SBE or M/WBE Subcontractors.¹⁰²

The County asks prime bidders to submit documentation of waiver requests seven days prior to the bid opening or proposal due date.¹⁰³ The documentation includes Scope of Service, Line Item No., S/M/WBE Type for Goal, Certified Firm Name, Address, Phone, Email and Contact Person Methods of Contact, Number of times contacted, Contact Date(s), Certified Firm Response, Results of Contact (why suitable or not suitable for work). If a waiver is granted to one firm, then an amendment to the solicitation is issued and the waiver is granted to all firms bidding on the contract.

¹⁰² Id. Good Faith Efforts.

¹⁰³ Palm Beach County, Office of Equal Business Opportunity, Good Faith Efforts Form

Table 13 below reflects waiver requests granted from FY 2019 to the middle of FY 2024. As can be seen in the table, nearly half the waivers were granted in the first years of the program, 95.5% were Departmental waivers, and only three were good faith efforts waivers.

Table 13: Goal Waivers Granted, FY 2019 through Second Quarter FY 2024
Palm Beach County 2025 Disparity Study

Fiscal Year	Department	Good Faith Efforts	Post Bid	Total
FY 2019	144	0	0	144
FY 2020	61	0	1	62
FY 2021	32	1	1	34
FY 2022	32	2	1	35
FY 2023	25	0	5	30
FY 2024 (2 quarters)	6	0	3	9
Total Waivers	300	3	11	314

Source, OEBO, Number of Waivers Granted – FY 2019 – FY 2023, May 6, 2024

N. SBE Evaluation Preferences and Other Incentives

As part of the EBO Program, Palm Beach County applies various Affirmative Program Initiatives (APIs), which, as applied to S/M/WBEs, take the form of evaluation preferences, subcontracting goals, price preferences, and other incentives.

Affirmative Procurement Initiatives (API) are various program tools and solicitation incentives that are used to encourage greater prime and subcontract participation by Small Business Enterprise (SBE) firms or Minority/Women Business Enterprise (M/WBE) firms, including, but not limited to, bonding assistance, evaluation preferences, subcontracting goals, vendor rotations, and joint venture incentives. . . .

Evaluation Preference means an API that may be applied by the Goal Setting Committee to Requests for Proposals (RFPs) for Construction, Professional Services, Other services, and Goods contracts that are to be awarded on a basis that includes factors other than lowest price and wherein responses that are submitted to the County by S/M/WBE firms or firms that have teamed with S/M/WBE firms may be awarded additional points in the evaluation process in the scoring and ranking of their proposals against those submitted by other prime respondents or bidders.¹⁰⁴

The County applies SBE Evaluation Preferences to professional services solicitations, for example. The methodology is as follows:

SBE Evaluation Preference for Prime Respondents or Bidders. Under this API, there are two (2) options available for the GSC to enhance contract opportunities for SBE Prime

¹⁰⁴ Palm Beach County Ordinance, § 2-80.21. Definitions.

Respondents or Bidders on "Best Value" professional services contracts where low bid price is not the only consideration in contract award:

Option 1

An SBE evaluation preference of up to fifteen (15) percent of the total number of available evaluation points for scoring of proposals shall be reserved for all SBE prime respondents or bidders on County professional services contracts valued at less than five hundred thousand dollars (\$500,000.00). SBE Prime respondents must perform the majority of the associated work under this API.

Option 2

Evaluation preference points shall be awarded on a sliding scale from zero up to fifteen (15) percent of the total available evaluation points for scoring of proposals to those firms responding to Professional Services solicitations valued at five hundred thousand dollars (\$500,000.00) or greater. The sliding scale shall be based upon the relative level of SBE dollar participation that has been committed to on the prime respondent's or bidder's team (e.g., zero SBE participation on a prime respondent or bidder's team shall yield zero evaluation points, whereas the maximum SBE participation among all prime respondents or bidders, at the prime contract and subcontract levels combined, shall yield award of fifteen (15) evaluation preference points out of one hundred (100); and a prime respondent's or bidder's team that achieves only half as many dollars in SBE participation as the firm with the greatest SBE dollar participation at the prime contract and subcontract levels combined shall be awarded seven and one-half (7.5) evaluation points out of one hundred (100).¹⁰⁵

As an example of Price Preference, for IFBs and RFQs, a responsive and responsible certified SBE that meets or exceeds the established goal will replace the Non-SBE bidder, provided the SBE bid does not exceed the lowest bid by more than 10%.¹⁰⁶ For RFPs and RFSS, certified SBEs are typically eligible to receive points for SBE participation. Tables 14 and 15 on the next page show points for Short listing and final selection.

¹⁰⁵ Palm Beach County Ordinance, § 2-80.27(3)(d).

¹⁰⁶ Palm Beach County Purchasing Department, Purchasing Policy and Procedures, PPM #: CW-L-008, Section V.A(3). (March 20, 2018). *See, for example*, Palm Beach County Ordinance, § 2-80.27(e):

SBE Price Preference. For construction contracts where there are no opportunities for subcontracting (e.g., single trade), the GSC may include a provision requiring awards of the contract to be made to the lowest responsive, responsible respondent or bidder unless a certified SBE's bid is within the ten (10) percent of the lowest non-small business bid, in which case the award shall be made to the certified small business respondent or bidder submitting the lowest responsive, responsible bid at the price that it bid. Prime SBE respondents must perform the majority of the associated work under this API.

**Table 14: Summary of MBE and SBE Selection Criteria
for Short Listing and Final Selection of A/E Firms
Palm Beach County 2025 Disparity Study**

Criteria	Point Value	
	Final Selection	Shortlist
State Certified MBE	2	2
EBO PROGRAM- one of the following evaluation preferences (if no evaluation preference was applied by the GSC or if a DBE goal applies these points are eliminated) 15 points for New SBE prime vendors. Or, Contracts less than \$500,000: 15 points for SBE Prime vendors. Or, Contracts \$500,000 or greater: up to 15 points for SBE participation for prime and subs. Or, Up to 15 points for M/WBE participation for prime and subs.	15	15

Source: Palm Beach County PPM #: CW-O-048 (Attachment 3).

**Table 15: Summary of Selection Criteria of Construction Management or Program
Management Firms
(Qualifications Based Selection Process)
Palm Beach County 2025 Disparity Study**

Criteria	Point Value
EBO PROGRAM one of the following evaluation preferences (if no evaluation preference was applied by the GSC or if a DBE goal applies these points are eliminated) EBO PPM Pilot Program SBE Evaluation Preference for Mentoring: 5 points for CM/SBE Partner. SBE Evaluation Preference for SBE Participation: up to 10 points for SBE Participation Plan. Or, EBO PPM Pilot Program M/WBE Evaluation Preference for Mentoring: 5 points for CM/ M/WBE Partner. M/WBE Evaluation Preference for M/WBE Participation: up to 10 points for M/WBE Participation Plan. Findings of the GSC for applying a M/WBE preference: [*For federal projects or where the funding is 50% or more State funds, these points must be eliminated]	15

Source: PPM #: CW-O-092 Selection of Construction Management (CM)

Table 16 below shows the distribution of SBE price preferences and goals on 610 projects reviewed by the Goal Setting Committee between January 2, 2019, and July 17, 2024. The most common API was SBE price preferences.

**Table 16: Goals and Preference, 2019 through 2024
Palm Beach County 2025 Disparity Study**

Goal and Preferences	(#)	(%)
SBE Price Preferences	234	38.36%
SBE Goals	94	15.41%
SBE Evaluation Preferences	59	9.67%
M/WBE Evaluation Preferences	24	3.93%
SBE Subcontracting Goals with M/WBE Goals	28	4.59%
Combination of Goals and Preferences	74	12.13%
No Goal or Preferences	80	13.11%
Other	17	2.79%
TOTAL	610	100.00%

Source: OEBO

O. Local Preference

The Local Preference applies to procurements of \$5,000 or more. Preference is given to bidders or proposers who have a permanent place of business in Palm Beach County before the County issues a solicitation for goods or services.¹⁰⁷ For an IFB or RFQ, a responsive and responsible local bidder meeting the requirements above will replace a non-local bidder, provided the local vendor's bid does not exceed the lowest bid by more than 5%. For services contracts that are awarded based upon proposal responses to an RFP or RFS, local vendors may receive additional points, not exceeding 5% of the total possible points.

P. Sheltered Market and Joint Ventures

Palm Beach County's EBO Ordinances authorizes the GSC to establish sheltered markets wherein only SBE firms are eligible to bid for construction contracts under \$100,000.¹⁰⁸ The only County department to use sheltered markets in construction during the Study Period was FDO and the data indicate that they did so on 14 occasions. The County EBO Ordinance also allows for small sheltered markets for emerging SBE firms that are 50% or less of the size of SBE firms.¹⁰⁹ The OEBO subsequently determined that sheltered markets were no longer allowed under Florida law.¹¹⁰

¹⁰⁷ Codex; Palm Beach County Purchasing Department, Purchasing Policy and Procedures, PPM #: CW-L-008, Section V.B. (March 20, 2018).

¹⁰⁸ County EBO Ordinance § 2-80.27 (1) b.

¹⁰⁹ County EBO Ordinance § 2-80.21. - Definitions. Small Business Enterprise.

¹¹⁰ Fl. Stat. § 255.0992.

When questioned about the Joint Venture API to build capacity among smaller firms, EBO staff reported little interest from SBE firms in assuming the organizational burdens and financial responsibilities of forming joint ventures.

Q. Reporting S/M/WBE Utilization

The County uses the Enterprise Contract Management System (eCMS), an internal system, to monitor S/M/WBE participation in County contracts. All subcontractor payments, both S/M/WBEs and Non-S/M/WBEs, are tracked in the eCMS and OEBO Administration system. A Schedule 4 (Subcontractor/Subconsultant Payment Certification) form is submitted for each subcontractor/subconsultant after receipt of payment from the prime. The Department issuing the solicitation is responsible for collecting and entering S/M/WBE, participation forms into eCMS for tracking.

The dollars spent with M/WBE firms are part of the required County EBO Program Reports. The EBO reports provide extensive, detailed data on each category of S/M/WBE firms, prime contracts and subcontracts, exempt and non-exempt County purchases. As shown in Table 17 below in FY 2019-23 OEBO reported the County spent \$110.50 million with M/WBE prime and subcontractors, 5.11% of the total County purchasing expenditures.

**Table 17: Palm Beach County M/WBE Prime & Subcontractor Payment Participation
Summary Report Exempt & Non-Exempt Contracts Combined
FY 2019-FY 2023
Palm Beach County 2025 Disparity Study¹¹¹**

Fiscal Year	Total Dollars Contracted	MBE		WBE		M/WBE	
		\$	%	\$	%	\$	%
FY2019	\$442,219,135	\$13,611,969	3.08%	\$5,826,201	1.32%	\$19,438,170	4.40%
FY 2020	\$532,066,931	\$17,188,528	3.23%	\$5,089,886	0.96%	\$22,278,414	4.19%
FY 2021	\$628,381,109	\$21,239,987	3.38%	\$8,775,741	1.40%	\$30,015,728	4.78%
FY 2022	\$559,860,619	\$29,901,678	5.34%	\$8,870,092	1.58%	\$38,771,770	6.93%
FY 2023	\$683,594,399	\$30,307,446	4.43%	\$13,108,789	1.92%	\$43,416,235	6.35%
Total	\$2,846,122,193	\$112,249,608	3.94%	\$41,670,709	1.46%	\$153,920,317	5.40%

Source: Palm Beach County, Office of Equal Business Opportunity, Annual Participation Report FY 2019 – 2022, November 7, 2023; Report, FY 2023, January 30, 2024 (Exhibit 7).

¹¹¹ This data does not cover the entire Study Period but is from the most recent OEBO report.

R. Commercial Nondiscrimination Ordinance

The County has a commercial nondiscrimination policy embedded as part of the EBO Program that provides that:

It is the policy of the County not to enter into a contract or to be engaged in a business relationship with any business entity that has discriminated in the solicitation, selection, hiring or commercial treatment of vendors, suppliers, subcontractors or commercial customers on the basis of race, color, national origin, religion, ancestry, sex, age, marital status, familial status, sexual orientation, gender identity or expression, disability, or genetic information, or on the basis of any otherwise unlawful use of characteristics regarding the vendor's, supplier's or commercial customer's employees or owners; provided that nothing in this policy shall be construed to prohibit or limit otherwise lawful efforts to remedy the effects of discrimination that have occurred or are occurring in the relevant marketplace for Palm Beach County.¹¹²

In addition to education activities around the Ordinance, the Ordinance requires that a commercial nondiscrimination clause be put into “all the County contracts that result from Formal Solicitations.”¹¹³

S. Disadvantaged Business Enterprise (DBE) Program

Although not included within the scope of the disparity study, Palm Tran, the operator of Palm Beach County's public transit system, has a Disadvantaged Business Enterprise (DBE) program.¹¹⁴ Palm Tran has an 11.31% DBE goal for FY 2024-26, of which 3% DBE participation is to be achieved through race neutral means.¹¹⁵ The Department of Airports (DOA) has a DBE program with a DBE goal of 20.9% for FY 2023-25.¹¹⁶ Engineering & Public Works (which handles road construction), does not have a separate DBE goal, but instead applies the Florida Department of Transportation goals to its road projects due to federal funding.¹¹⁷

T. Business Development Efforts

1. Management and Technical Assistance

OEBO reported providing technical assistance and/or support services to 1,685 S/M/WBEs in FY 2022.¹¹⁸ The County Ordinance provides for establishment of a work group to review a variety of SBE mentor-

¹¹² County Ordinances, Sec. 2-80.24(a). - Commercial nondiscrimination policy. Coverage for gender identity or expression was removed in 2025, outside the Study Period.

¹¹³ County Ordinances, Sec. 2-80.24(b). See Palm Beach County Commercial Non-Discrimination Certification.

¹¹⁴ Note, the Disadvantaged Business Enterprise (DBE) program is not part of the disparity study.

¹¹⁵ Palm Tran Disadvantaged Business Enterprise (DBE) Program Goals/Methodology Fiscal Year 2024-2026.

¹¹⁶ Palm Beach International Airport (PBI) DBE Program Overview, September 2022, page 32.

¹¹⁷ The County DBE program is not part of the Study, and this information is for background purposes only.

¹¹⁸ Palm Beach County, Budget Book 2024, page 290.

protégé program models and to recommend the County's adoption of such an SBE mentor protégé program.¹¹⁹ In 2019, the County Administrator, along with the Directors of FDO and OEBO, launched the Construction Manager at Risk (CM@R) Pilot Program, a mentor-protégé initiative.¹²⁰ This program provides up to five percent evaluation preference points for construction-related Request for Proposals (RFPs) to firms that commit to mentoring S/M/WBE firms by offering management guidance and training.

From 2019 to 2022, thirteen (13) County-funded contracts using the CM@R contracting method were awarded by FDO, each including an S/M/WBE partner. The project values range from \$6.8 million to \$50 million and M/WBEs received over an estimated \$19.43 million in pre-construction fees. All the mentees were M/WBEs. Given the success, the County decided to make this program permanent.¹²¹

Additionally, firms can earn up to 10% of the total evaluation points based on their past participation with S/M/WBE firms on government or private sector projects, their proposed S/M/WBE participation plan, and their commitment to achieving applicable APIs for subcontracting. From 2019 to 2022, thirteen (13) County-funded contracts using the CM@R contracting method were awarded by FDO, each including an S/M/WBE partner.¹²² The project values range from \$6.8 million to \$50 million and M/WBEs received over an estimated \$19.43 million in pre-construction fees. All of the mentees were M/WBEs.

2. Financial Assistance

The County does not currently provide traditional small business loans to firms. The OEBO has had a series of meetings with the Economic Council of Palm Beach County, Inc. and the Palm Beach County Banking Consortium that included the Bank of America, Valley Bank, JP Morgan Chase Bank, the Black Business Investment Corporation (BBIC), the Center for Enterprise Opportunity (CEO), and the Paragon Foundation about capital needs for SBEs and M/WBEs.

These discussions focused on identifying potential funding solutions, strengthening partnerships, and exploring financial programs to address the capital challenges faced by small and Minority/Women-owned businesses. By collaborating with these financial institutions and economic development organizations, Pathway Capital Funding was created to provide innovative loan products as well as financial counseling and training. The County continues to facilitate greater access to funding opportunities, empowering local businesses to thrive and contribute to the area's economic vitality.

¹¹⁹ County Code of Ordinances Sec. 2-80.27(1)(d). - SBE Mentor-Protégé Program.

¹²⁰ See Palm Beach County Ordinance, §§ 2-80.27(1)(d); 2-80.27(2)(e); Palm Beach County PPM# CW-O-043, Attachment 3.

¹²¹ Palm Beach County Ordinance, §§ 2-80.27(1)(d) ("The Mentor/Protégé RFP evaluation preferences is now a permanent policy, as amended, due to its effectiveness and will continue to be available for use by the GSC for construction-related RFPs.").

¹²² Palm Beach County, Office of Equal Business Opportunity, Annual Participation Report, FY 2019 – 2022, pages 6-7.

U. Office of Equal Business Opportunity

1. OEBO Mission and Vision

The stated mission and vision of OEBO is:

Mission Statement: To foster the inclusion of local small, Minority, Women-owned business enterprises (S/M/WBE) in the county's procurement process which influences the economic development of the County.

Vision: To be the most valuable resource and leading advocate for S/M/WBEs throughout Palm Beach County.¹²³

2. OEBO Duties

The County Code provides the following duties and responsibilities for the OEBO:

- a. Report to the County and the public, based on available data, on at least an annual basis as to the County's progress toward satisfying the EBO Ordinance purposes and objectives.
- b. Formulate, establish, distribute, and implement additional forms, rules, and procedures for EBO Program waivers, improvements and adjustments to the goal-setting methodologies and other EBO Program features.
- c. Have advanced substantive input in a contract specification review process consistent with this EBO Ordinance to ensure that contract solicitation specifications are not unnecessarily restrictive and unduly burdensome to S/M/WBE firms.
- d. Receive and analyze external and internal information, including statistical data and anecdotal testimony regarding the barriers encountered by S/M/WBE firms in attempting to obtain contract opportunities at the County, and the relative effectiveness of various APIs in addressing those barriers.
- e. Monitor and support the implementation of the EBO Program policies and procedures and propose modifications to appropriate County officials as necessary to fully achieve the purpose and objectives of the EBO Program policies and procedures.
- f. Provide public education and advocacy internally and externally regarding the purposes and objectives of the EBO Ordinance.
- g. Develop, maintain, and distribute directories of certified SBEs and M/WBEs.
- h. Assess technical assistance needs of S/M/WBE firms and provide seminars and technical assistance referrals to S/M/WBE firms to enhance their ability to effectively compete for County contracts.
- i. Investigate alleged violations of this EBO Ordinance and provide written recommendations to appropriate authorities for remedial action and imposition of sanctions and penalties when necessary.
- j. Determine Prime Contractor compliance with EBO Ordinance requirements prior to award and again prior to release of final retainage.
- k. Oversee the maintenance of an accurate contract performance and compliance reporting system.

¹²³ <https://discover.pbcgov.org/oebo/Pages/About-Us.aspx>.

- l. Provide staff support for the Goal Setting Committee and the EBO Advisory Committee.
- m. Collaborate with Information Systems Services, FDO, and the Purchasing Department to streamline the invoice and payment procedures at the County so as to accelerate payments for undisputed invoices within thirty (30) days of receipt to prime contractors and vendors, and to require such prime vendors and vendors to then pay undisputed subcontractor invoices within ten (10) days of receipt of invoice.¹²⁴

3. Performance Measures and Emerging Issues

The OEBO has the following performance measures:

- Number of contract awards to S/M/WBES.
- Number of current and potential S/M/WBES provided with technical assistance and/or support services.
- Number of outreach events OEBO has hosted, sponsored, and/or participated in.
- Number of trainings for County staff.
- Number of waivers processed.
- Percentage of outreach attendees that have become certified or recertified.
- Provide multiple platforms for customers to provide feedback.
- Total number of certification, recertification and modification applications processed.¹²⁵

The County 2024 Budget listed the following as emerging issues for OEBO:

- Develop stronger participation and engagement with western community small businesses.
- Need for translation of program materials due to the increased interest in learning how to do business with Palm Beach County by Haitian and Spanish populations.
- Continued operation of the EBO Program to increase participation and utilization in procurement opportunities.¹²⁶

4. OEBO Staffing, Budget, Advisory Committee

The County OEBO has a FY2024 proposed budget of \$1,788,145.¹²⁷ OEBO staff includes the Director, Manager, Financial Analyst II, Administrative Assistant II, Contract Analyst, Outreach and Public Information Coordinator, and six Small Business Development Specialists.¹²⁸

¹²⁴ Sec. 2-80.28(b)(1)(a). Office of EBO General Duties. Also included in the OEBO duties and responsibilities are compliance and reporting responsibilities, Sec. 2-80.28(b)(3, 4).

¹²⁵ Palm Beach County, 2024 Budget Book, page 290.

¹²⁶ Id. at page 285.

¹²⁷ Palm Beach County, 2024 Budget Book, page 286.

¹²⁸ <https://discover.pbcgov.org/oebo/pages/about-us.aspx>.

The County has an Equal Business Opportunity Advisory Committee (EBOAC). There are regular reports on certification and outreach presented to EBOAC. EBOAC has fifteen seats for members who serve three-year terms. The seats are for the following: Certified Black Business Owner, Certified Hispanic Business Owner, Certified Woman Business Owner, Certified White Male Business Owner, Business Owner Domiciled in PBC, Business Incubator Program, Hispanic Business Organization, National Association of Women in Construction, Women's Business Organization, Minority Contractor, Associated General Contractors, Small Business Development Center, Financial Institution that assists Small Businesses, Black Chamber of Commerce, and a Professional Services Organization.¹²⁹ The committee held ten meetings in 2019 and eight meetings in 2020. The meetings thereafter were held bi-monthly (beginning in 2021), resulting in five meetings that year, five meetings in 2022, and six meetings in both 2023 and 2024.¹³⁰

V. Conclusion

County staff reported few procurement barriers, except current issues with prompt payment and some concerns about insurance. Barriers identified by vendors are reported in the Anecdotal chapter.

The Palm Beach County EBO program is a well-developed program with many innovative features. The EBO program is primarily an SBE program augmented with some M/WBE program features that are occasionally applied as necessary. The most prominent remedial features have been SBE price preferences. SBE subcontractor goals are based on demonstrated availability by trade with departmental review and opportunities for good faith efforts waivers, pre- and post-bid. The County stopped using sheltered markets in construction pursuant to Florida law. The County undertakes extensive outreach and partnerships with business development efforts. The County has had a successful mentor protégé program in Construction Management at Risk.

W. Program Update Note

In June 2025, outside of the Study Period, the County passed an ordinance which expressly suspended certain aspects of the EBO Program:

Sec. 2-80.31. Suspension of Diversity, Equity and Inclusion (DEI) Programs.

The Palm Beach County Board of County Commissioners suspends the following ordinances, or portions thereof, and applicable programs, policies, and practices:

- (a) Enforcement of the race- and/or gender-conscious portions of chapter 2, article III, division 2, Part C of the Palm Beach County Code and Policies and Procedures Manual CW-O-043 (the "Equal Business Opportunity Program"). Enforcement shall include, but is not limited to, the following:
 - (1) Establishing race- and/or gender-conscious affirmative procurement initiatives;
 - (2) Enforcing race- and/or gender-conscious subcontracting goals; and
 - (3) Certifying businesses as minority- or women-owned.

¹²⁹ <https://discover.pbcgov.org/oebo/Pages/EBAC-Committee-Members.aspx>.

¹³⁰ Palm Beach County, Office of Equal Business Opportunity, Annual Participation Report FY 2019 – 2022, page 45; EBO Final Report, FY 2023 – 2024 (Q1).

Notwithstanding the above, the race- and gender-neutral portions of Equal Business Opportunity Program will continue to be enforced.

(b) Written justifications for hiring positions identified to have underrepresentation pursuant to any Equal Employment Opportunity/Affirmative Action Plan.

(c) Reporting and identifying the race and gender makeup of Palm Beach County boards and committees.

(d) Utilization of references to "gender identity or expression" or similar terms in County ordinances, resolutions, programs, and policies.

(e) Any other ordinance, program, policy, and/or practice presumptively considered to be a DEI and/or DEIA program. Notwithstanding any provision of this section to the contrary, nothing in this section shall be construed as repealing or suspending any policy or program required by federal law.

The foregoing ordinances or portions thereof, programs, policies, and practices are suspended until further action of the Board of County Commissioners or two (2) years from the Effective Date, whichever comes first.

(Ord. No. 2025-014, § 2, 6-3-25)

This legislation may affect potential recommendations that G&S might otherwise offer given the restrictions set forth in this legislation, but the full scope and effect of the ordinance is not yet known.

V. QUANTITATIVE ANALYSIS

A. Introduction

The quantitative analysis measures and compares the Availability of firms in each race/ethnicity/gender group within Palm Beach County's ("County") Relevant Geographic Market Area to the Utilization of Minority- and Women-owned firms (collectively "M/WBEs" or "Study Group"), measured by the payments made to these groups by the County from January 1, 2019, to December 31, 2023 ("Study Period").

Statistical Analysis Research Question:

Is there a disparity that is statistically significant between the percentage of available M/WBE firms, in the Relevant Geographic Market Area, and the percentage of dollars spent with M/WBEs in that same Relevant Geographic Market Area during the Study Period?

The outcome of the comparison shows whether there is a disparity between Availability and Utilization and whether that disparity represents an Overutilization, an Underutilization, or is at Parity (the amount to be expected). Further, the disparity is tested to see if it is statistically significant. Finally, the regression analysis contained in Chapter VII: "Palm Beach County Marketplace Contracting Disparities" will test for race- and gender-neutral explanations of the disparity to determine if it is likely that the disparity is, in part, caused or affected by the race/ethnicity/gender status of the firm owner. If there is statistically significant underutilization of M/WBEs that is likely caused by race/ethnicity/gender, then G&S will determine, as part of the findings, whether there is a sufficiently strong factual predicate that warrants consideration of narrowly tailored race- and/or gender-conscious remedies under current law.

B. Data Assessment and Requests

The data assessment process was initiated with a meeting with representatives from the County's various departments that are involved in purchasing. G&S then conducted seven (7) follow up meetings with individual departments: Airports, Engineering and Public Works, Environmental Resources Management, Facilities Development and Operations, Palm Tran, Purchasing, and Water Utilities. The purpose of these meetings was to determine what data the County maintains, in what format, and how G&S can obtain the data. Further, the objective was for G&S to get a better understanding of the County's purchasing process. It was also important for G&S's team to get to know procurement personnel and understand how to conduct the Study in a manner least intrusive to the County.

Following approval of the Data Assessment Report, which is attached hereto as Appendix C, G&S developed and executed a Data Collection Plan and submitted data requests to the County. The Data Collection Plan sets out the process for collecting manual and electronic data for statistical analyses. In addition, it included a plan for collecting data needed for the anecdotal portions of the study which included surveys, public hearings, focus groups, and interviews.

In response to the data requests issued by G&S, the County supplied electronic data (Microsoft Excel or other computer spreadsheets) that were then uploaded, catalogued and stored into G&S's SharePoint.. The

entered sources of data were used to develop databases containing contracting history for each Industry Category, for both prime contracting and subcontracting activity. G&S related all the databases collected to cross-reference information among the files, including matching addresses, Industry Categories, and race/ethnicity/gender identification.

C. Data Assignment, Cleanup and Verification

After the completion of data collection, the data was electronically and manually “cleaned” to find duplicates and fill in unpopulated fields. The cleanup phase also included the following six (6) tasks:

- Finding firms and purchases to be excluded from the analysis (e.g. governmental agencies, not-for-profits, utilities, colleges & universities, et. al);
- Assigning ethnicity, race, and gender of each firm owner;
- Assigning each firm to one or more of the five (5) Industry Categories based upon the type of firm;
- Utilizing zip codes to determine each firm’s location;
- Matching files electronically to pick up addresses, race/ ethnicity/gender, and/or Industry Category; and
- Filling in any additional missing data on firms.

1. Assignment of Race/Ethnicity/Gender Certifications

To identify M/WBEs, G&S utilized the assignments given to firms in the governmental lists from the:

- City of West Palm Beach Certified M/WBE Directory
- Broward County Public Schools Certified Suppliers List
- Broward County Small Business Certified Firms Directory
- Florida Department of Transportation Unified Certification Program Disadvantaged Business Enterprise Directory
- Miami-Dade County Certified Directory
- Palm Beach Office of Equal Business Opportunity Certified Directory
- Palm Beach Schools Certified Vendor Directory
- State of Florida Certified Directory (MyFloridaMarketPlace)
- Small Business Administration certified firms

In assignment of race/ethnicity/gender, priority is given to race/ethnicity, so that all Minority-owned firms were categorized according to their race/ethnicity and not by gender. Firms owned by White Women are classified by race and gender, while firms with no demographic data, White Male-owned firms, publicly owned corporations, and other non-certified entities were classified as Non-M/WBEs.

From all the governmental certification sources, G&S assembled a Master Certification List. Where there were any inconsistencies, G&S researched the firm and manually resolved any inconsistencies.

2. Assignment of Industry Categories

To place firms in the proper Industry Categories, G&S used the type of work the firm performed, item purchased, or work descriptions to assign the firms into one of the five (5) industries of Construction (horizontal or vertical construction or all construction trades), Professional Services (CCNA) (architects, engineers, construction management, and surveyors), Professional Services (Non-CCNA) (financial, legal, medical, and consultants), Services (all other services), and Goods/Commodities (all tangible items).¹³¹ Further, where other indicators were missing G&S used certain word descriptions in firm names (e.g. ABC Construction or XYZ Mowing Services) and researched firms to determine the type of work they did.

D. Master Vendor File – Data Source Description

The purpose of the Master Vendor File is to collect, in one database, a listing of all firms that are ready, willing, and able to do business with the County. It includes internal lists from Palm Beach County as well as outside governmental lists. The Master Vendor file is used to determine Availability estimates. It was also used to match and verify data in other data files, particularly to make sure that information assigned to firms for utilization calculations matched the information assigned to firms for Availability calculations. This is important to make sure that G&S compares comparable data sets.

The Master Vendor File contains the lists of firms from the following government vendor data sources and internal Palm Beach County data sources:

Palm Beach County Data Files:

- Awards (Study Period)
- Bid Tabs (Study Period)
- Palm Beach Office of Equal Business Opportunity Certified Directory
- Payments (Study Period)
- Subcontractors (Study Period)
- Vendor List (Current)

External Data Sources:

- City of West Palm Beach Certified Directory
- Florida Department of Transportation Pre-certified Consultants
- Florida Department of Transportation Prequalified Contractors
- Florida Department of Transportation Unified Certification Program Disadvantaged Business Enterprise Directory
- Palm Beach Schools Certified Vendor Directory
- State of Florida Vendor List (MyFloridaMarketPlace), including the State of Florida Certified Directory

¹³¹ CCNA *Professional Services* refers to services subject to the Consultants' Competitive Negotiation Act (CCNA), including architects, landscape architects, engineers, surveyors, and mappers. This definition aligns with Florida's Statutes, as outlined on FLSenate.gov.

E. Relevant Geographic Market Area Analysis

The commonly held idea that the Relevant Geographic Market Area should encompass at least 75% of the "qualified" vendors that serve a particular sector has its origins in antitrust lawsuits.¹³² In line with antitrust precepts, United States Supreme Court Justice Sandra Day O'Connor in Croson, specifically criticized the City of Richmond, Virginia, for making MBEs all over the country eligible to participate in its set-aside programs.¹³³ The Court reasoned that a mere statistical disparity between the overall Minority population in Richmond, Virginia, which was 50% African American, and the award of prime contracts to Minority-owned firms, 0.67% of which were African American-owned firms, was an insufficient statistical comparison to raise an inference of discrimination. Justice O'Connor also wrote that the relevant statistical comparison is one between the percentage of MBEs in the marketplace (or Relevant Geographic Market Area) who were qualified to perform contracting work (including prime and subcontractors) and the percentage of total City contracting dollars awarded to Minority firms.

Relevant Geographic Market Area is the geographic location where Palm Beach County spends at least 75% of its dollars. The Utilization and Availability analyses are conducted only using firms located within the Relevant Geographic Market Area.

To identify Palm Beach's Relevant Geographic Market Area, G&S examined the County's spending patterns within the following five (5) Industry Categories:

- Construction
- Professional Services (CCNA)
- Professional Services (Non-CCNA)
- Services
- Goods/Commodities

For each Industry Category, G&S identified the Relevant Geographic Market Area by analyzing the distribution of the County's prime dollars during the Study Period. Vendor postal ZIP codes were converted to counties and states, enabling an assessment of where spending was most concentrated.

Given the significant concentration of spending in Palm Beach County—particularly in Construction (88.93%) and Professional Services (CCNA) (89.63%)—Palm Beach County was identified as the Relevant Geographic Market Area for this analysis. Across the combined categories of Construction, Professional Services (CCNA), Professional Services (Non-CCNA), and Services, 76.82% of spending was directed to firms in Palm Beach County, supporting this designation (excluding Goods/Commodities where spending is typically widespread geographically).

¹³² D. Burman. "Predicate Studies: The Seattle Model," Tab E of 11-12 Minority and Females Business Programs Revisited (ABA Section of Public Contract law, Oct. 1990)

¹³³ Croson, 488 U.S. 509, 709 S. Ct. 706 (1989)

Figure 2: Map of Florida Counties Highlighting Relevant Geographic Market Area¹³⁴
Palm Beach County 2025 Disparity Study

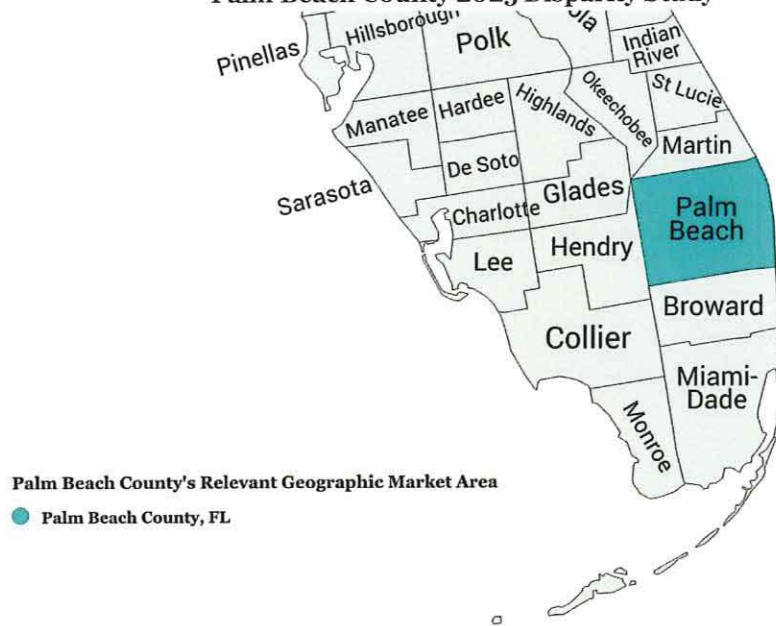


Table 18 on the following page presents the allocation of Palm Beach County's payments to vendors during the Study Period by county and by Industry Category. This table offers insight into how contract spending was geographically concentrated during the Study Period.

¹³⁴ <https://www.mapchart.net/>

Table 18: Relevant Geographic Market Area Distribution of Payments by Industry Category¹³⁵

(Using Payment Dollars, CY2019-CY2023)

Palm Beach County 2025 Disparity Study

Work Category	Area	Amount	Percent	Cumulative %
Construction	Palm Beach County, FL	\$ 426,708,797	88.93%	88.93%
	Rest of MSA*	\$ 35,356,136	7.37%	96.30%
	CSA**	\$ 4,600,909	0.96%	97.26%
	Rest of Counties in Florida	\$ 5,374,266	1.12%	98.38%
	Rest of USA	\$ 7,777,825	1.62%	100.00%
	Total	\$ 479,817,933	100.00%	
Professional Services (CCNA)	Palm Beach County, FL	\$ 89,276,361	89.63%	89.63%
	Rest of MSA*	\$ 3,873,584	3.89%	93.52%
	CSA**	\$ 74,087	0.07%	93.59%
	Rest of Counties in Florida	\$ 4,564,654	4.58%	98.18%
	Rest of USA	\$ 1,815,465	1.82%	100.00%
	Total	\$ 99,604,152	100.00%	
Professional Services (Non-CCNA)	Palm Beach County, FL	\$ 82,109,267	42.64%	42.64%
	Rest of MSA*	\$ 41,630,521	21.62%	64.26%
	CSA**	\$ 101,166	0.05%	64.31%
	Rest of Counties in Florida	\$ 31,704,315	16.46%	80.77%
	Rest of USA	\$ 37,021,895	19.23%	100.00%
	Total	\$ 192,567,164	100.00%	
Services	Palm Beach County, FL	\$ 136,787,372	74.09%	74.09%
	Rest of MSA*	\$ 15,271,543	8.27%	82.36%
	CSA**	\$ 781,843	0.42%	82.79%
	Rest of Counties in Florida	\$ 3,306,464	1.79%	84.58%
	Rest of USA	\$ 28,473,984	15.42%	100.00%
	Total	\$ 184,621,206	100.00%	
Goods/Commodities	Palm Beach County, FL	\$ 260,895,135	44.53%	44.53%
	Rest of MSA*	\$ 156,639,155	26.74%	71.27%
	CSA**	\$ 2,585,627	0.44%	71.71%
	Rest of Counties in Florida	\$ 61,791,941	10.55%	82.25%
	Rest of USA	\$ 103,975,021	17.75%	100.00%
	Total	\$ 585,886,878	100.00%	
Total	Palm Beach County, FL	\$ 995,776,932	64.56%	64.56%
	Rest of MSA*	\$ 252,770,939	16.39%	80.94%
	CSA**	\$ 8,143,631	0.53%	81.47%
	Rest of Counties in Florida	\$ 106,741,640	6.92%	88.39%
	Rest of USA	\$ 179,064,191	11.61%	100.00%
	Total	\$ 1,542,497,334	100.00%	

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¹³⁵ *The Miami–Fort Lauderdale–West Palm Beach Metropolitan Statistical Area (MSA) is comprised of: Palm Beach County, Florida; Miami-Dade County, Florida; Broward County, Florida.

**The Miami-Port Saint Lucie-Fort Lauderdale Combined Statistical Areas (CSA) is comprised of: St. Lucie County, Florida; Martin County, Florida; Indian River County, Florida; Monroe County, Florida; Okeechobee County, Florida.

Note: G&S uses full decimal numbers, so automatic rounding may cause differences within the tables.

F. Availability

1. Methodology

The methodology used to determine the Availability of businesses for public contracting is crucial to understanding whether a disparity exists within the Relevant Geographic Market Area. Availability is a benchmark to examine whether there are any disparities between the Utilization of the Study Groups and their Availability in the marketplace.

Availability is the determination of the percentage of Study Group members that are “ready, willing, and able” to provide Goods or Services to the Palm Beach County.

Croson and subsequent decisions give only general guidance as to how to measure Availability. One common theme from the court decisions is that being qualified to perform work for a local jurisdiction is one of the key indicators of being an available firm. In addition, the firm must have demonstrated that it is both willing and able to perform the work.

The measures of Availability used in this Study align with the criteria established by Croson. These include:

- The firm operates within an Industry Category from which the County procures goods or services;
- The firm's owner has taken steps (such as registering, bidding, certifying, prequalifying, etc.) to demonstrate interest in doing business with government entities or Palm Beach County; and
- The firm is located within the Relevant Geographic Market Area.

An Availability estimate is expressed as a percentage of total Availability, computed by dividing the number of firms in each Study Group in each Industry Category by the total number of businesses in the pool of firms for that Industry Category. Once these Availability estimates were calculated, G&S compared them to the percentage of firms utilized in the respective Industry Categories to generate the Disparity Indices, which will be discussed later in this analysis.

2. Measurement Basis for Availability

There are several approaches to measuring the Availability of qualified firms. G&S has developed a methodology for measuring Availability based on demonstrated interest in doing business with government entities or Palm Beach County. A firm is considered to demonstrate interest if its owner has taken steps such as registering, bidding, obtaining certification, prequalifying, or other similar actions.

3. Capacity

The ability or capacity to perform the work is tested in the Regression Analysis conducted in the Marketplace Disparities Analysis herein. The Regression Analysis shows whether race, ethnicity, and gender factors are impediments overall to the success of M/WBEs in obtaining awards in the marketplace and whether, but for those factors, firms would have the capacity to provide goods and services on a level

higher than what is presently being utilized. G&S also tests for capacity by conducting a disparity analysis on contracts under \$500,000 where capacity is not an issue.

4. Availability Estimates by Industry Category

The Availability estimates for the Study are separated into five (5) Industry Categories. Figures 2 through 6 below show the percentage of available firms by ethnicity/gender relative to the total number of available firms. See Tables 1 through 5 in Appendix E for detailed Availability information including the breakdown by Industry Category and the ethnicity or gender of the firm owners. The Availability analysis, derived from the Master Vendor File, includes all unique vendors across all ethnicity/gender in each Industry Category from the sources previously listed.

a) Construction

The Availability of Construction firms in Palm Beach's Relevant Geographic Market Area is shown in Figure 2 below. As illustrated, Non-M/WBE owned firms accounted for 86.83% of all available Construction firms, followed by African American-owned firms at 5.36%. Hispanic American-owned firms represented 4.43%, while White Woman-owned firms made up 2.80%. Asian American-owned firms constituted 0.58% of total Construction Availability while there were no Native American-owned firms. For the actual number of businesses in each race, ethnicity, and gender group, refer to Table 1 in Appendix E.

**Figure 3: Availability Estimates – Construction
in the Relevant Geographic Market Area
Palm Beach County 2025 Disparity Study**

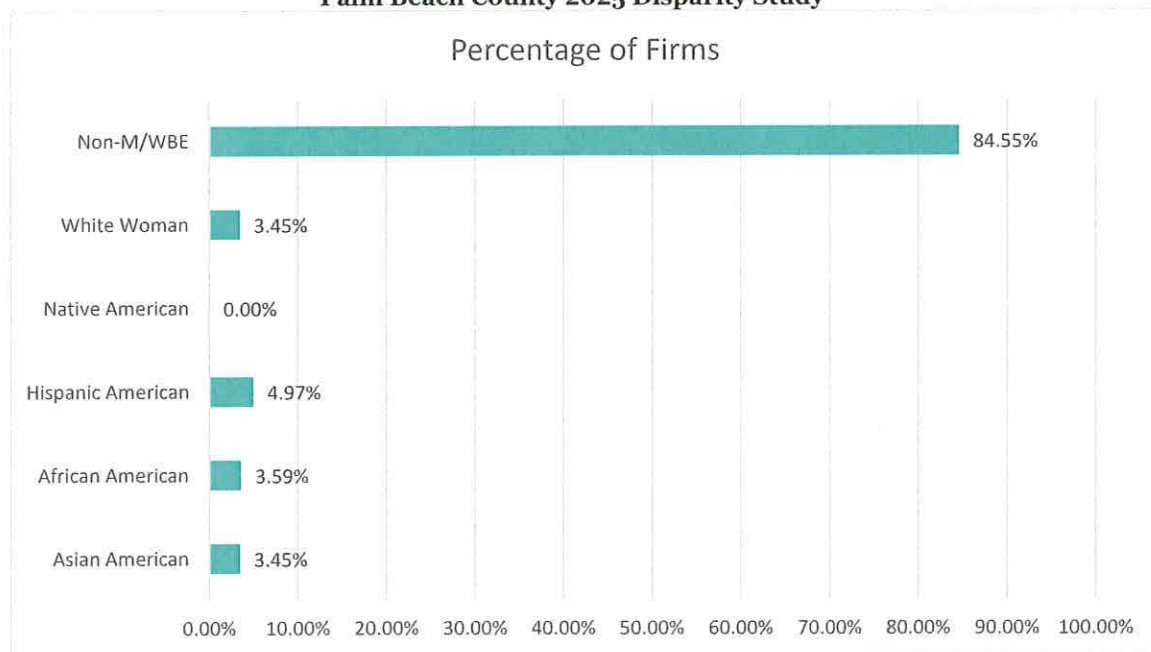


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b) Professional Services (CCNA)

The Availability percentage estimates of Professional Services (CCNA) firms, disaggregated by race, ethnicity, and gender in the County's Relevant Geographic Market Area, is presented in Figure 3. As shown, Non-M/WBE owned firms represented 84.55% of the total available Professional Services (CCNA) firms. Hispanic American-owned firms accounted for 4.97%, followed by African American-owned firms at 3.59%. Both Asian American and White Woman-owned firms constituted 3.45% of available firms. Native American-owned firms had no representation in this Industry Category. For a detailed breakdown of the actual number of firms by race, ethnicity, and gender, see Table 2 in Appendix E.

**Figure 4: Availability Estimates – Professional Services (CCNA)
in the Relevant Geographic Market Area
Palm Beach County 2025 Disparity Study**

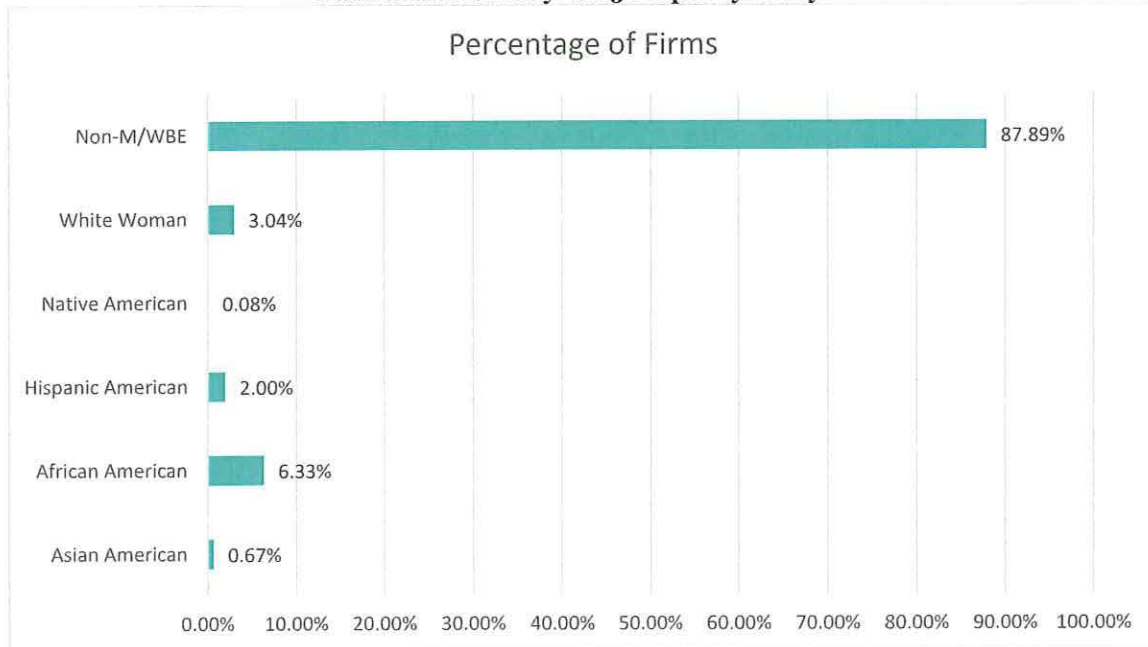


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c) Professional Services (Non-CCNA)

Figure 4 presents the distribution of available Professional Services (Non-CCNA) firms in the Relevant Geographic Market Area, categorized by race, ethnicity, and gender. Non-M/WBE owned firms comprised the majority at 87.89% of the total. African American-owned firms represented 6.33%, followed by White Woman-owned firms at 3.04% and Hispanic American-owned firms at 2.00%. Asian American-owned firms accounted for 0.67%, while Native American-owned firms made up 0.08%.

**Figure 5: Availability Estimates – Professional Services (Non-CCNA)
in the Relevant Geographic Market Area
Palm Beach County 2025 Disparity Study**



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d) *Services*

The Availability of Services firms in Palm Beach County's Relevant Geographic Market Area is shown in Figure 5 below. As shown, 89.17% of firm owners were Non-M/WBEs while African American-owned firms represented 6.14%. Hispanic American-owned firms accounted for 2.43%, and White Woman-owned firms made up 1.86%. Asian American-owned firms constituted 0.40%, and Native American-owned firms had no representation in this Industry Category. For a detailed numerical breakdown by race, ethnicity, and gender, refer to Table 4 in Appendix E.

**Figure 6: Availability Estimates – Services
in the Relevant Geographic Market Area
Palm Beach County 2025 Disparity Study**



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e) Goods/Commodities

Figure 6 illustrates the distribution of firm ownership by race, ethnicity, and gender in Goods/Commodities. Non-M/WBE owned firms comprised the largest share at 89.99% while White Woman-owned firms represented 3.99%. African American-owned firms represented 3.69% followed by Hispanic American-owned firms at 1.80%. Asian American-owned firms constituted 0.53% while Native American-owned firms had no representation in Goods/Commodities. For the actual number of businesses in each race, ethnicity, and gender group, refer to Table 5 in Appendix E.

**Figure 7: Availability Estimates – Goods/Commodities
in the Relevant Geographic Market Area
Palm Beach County 2025 Disparity Study**



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G. Utilization Analysis

1. Prime Contractor Utilization by Race/Ethnicity/Gender

The prime payment history for Palm Beach County was compiled using payment data extracted from the County's financial system. As the County sets S/M/WBE contracting goals only on projects funded through local dollars, the prime contractor utilization tables presented in this chapter reflect

Prime Utilization is the percentage of actual payments during the Study Period made directly by Palm Beach County to M/WBEs in comparison to all vendors.

locally funded payments exclusively.¹³⁶ These tables provide a breakdown of dollars and percentages paid in each of the five (5) Industry Categories, categorized by race, ethnicity, and gender for each year of the Study Period. The totals for each race, ethnicity, and gender group within the M/WBE category, when combined with the Non-M/WBEs category, equal the Total Column. Utilization data related to state-funded dollars is included in Appendix H for reference.

a) Construction

As shown in Table 21, the County allocated \$370,440,141 to Construction, the highest expenditure among the five Industry Categories, accounting for 40.64% of total spending. Of this amount, \$39,273,253 (10.60%) was allocated to M/WBE firms, while Non-M/WBE owned firms received \$331,166,889 (89.40%). African American and Hispanic American-owned firms received their highest total dollar amounts in this Industry Category.

Table 20 displays the number of unique Prime Construction firms utilized during the Study Period: 44 M/WBEs (22.56%) and 151 Non-M/WBE firms (77.44%).

Based on the distribution shown in Tables 20 and 21, the average amount paid per firm within each Study Group is presented in Table 19.

**Table 19: Average M/WBE Prime Spend in Construction
in the Relevant Geographic Market Area
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Average Firm Spend
African American	\$ 826,752
Asian American	\$ 21,897
Hispanic American	\$ 879,908
Native American	\$ -
TOTAL MINORITY	\$ 801,366
White Woman	\$ 1,135,796
TOTAL M/WBE	\$ 892,574
Non-M/WBE	\$ 2,193,158
TOTAL FIRMS	\$ 1,899,693

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¹³⁶ Only local dollars are included in this primary analysis because the outcomes and recommendations of this Study may not be applicable to federally funded projects where the federal Disadvantaged Business Enterprise Program (DBE) applies or to state-funded projects where goals are prohibited.

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**Table 20: Number of Prime Construction Firms
in the Relevant Geographic Market Area
Disaggregated by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019 (#)	2020 (#)	2021 (#)	2022 (#)	2023 (#)	Total Number of Unique Businesses
African American	5	8	8	5	7	15
Asian American	1	0	0	1	0	2
Hispanic American	11	11	8	9	6	15
Native American	0	0	0	0	0	0
TOTAL MINORITY	17	19	16	15	13	32
White Woman	7	8	10	8	6	12
TOTAL M/WBE	24	27	26	23	19	44
Non-M/WBE	95	91	103	89	59	151
TOTAL FIRMS	119	118	129	112	78	195
Business Ownership Classification	2019 (%)	2020 (%)	2021 (%)	2022 (%)	2023 (%)	Total Number of Unique Businesses
African American	4.20%	6.78%	6.20%	4.46%	8.97%	7.69%
Asian American	0.84%	0.00%	0.00%	0.89%	0.00%	1.03%
Hispanic American	9.24%	9.32%	6.20%	8.04%	7.69%	7.69%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	14.29%	16.10%	12.40%	13.39%	16.67%	16.41%
White Woman	5.88%	6.78%	7.75%	7.14%	7.69%	6.15%
TOTAL M/WBE	20.17%	22.88%	20.16%	20.54%	24.36%	22.56%
Non-M/WBE	79.83%	77.12%	79.84%	79.46%	75.64%	77.44%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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Note: G&S uses full decimal numbers, so automatic rounding may cause differences within the tables.

**Table 21: Utilization Analysis of Prime Construction
in the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019 (\$)	2020 (\$)	2021 (\$)	2022 (\$)	2023 (\$)	TOTAL (\$)
African American	\$ 1,056,236	\$ 3,032,375	\$ 918,437	\$ 3,084,751	\$ 4,309,485	\$ 12,401,284
Asian American	\$ 35,550	\$ 0	\$ 0	\$ 8,243	\$ 0	\$ 43,793
Hispanic American	\$ 1,689,124	\$ 5,651,741	\$ 2,277,019	\$ 2,377,825	\$ 1,202,918	\$ 13,198,627
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 2,780,910	\$ 8,684,116	\$ 3,195,456	\$ 5,470,819	\$ 5,512,403	\$ 25,643,704
White Woman	\$ 2,840,514	\$ 3,598,393	\$ 3,054,621	\$ 2,166,309	\$ 1,969,712	\$ 13,629,549
TOTAL M/WBE	\$ 5,621,424	\$ 12,282,509	\$ 6,250,077	\$ 7,637,128	\$ 7,482,114	\$ 39,273,253
Non-M/WBE	\$ 73,904,618	\$ 111,406,059	\$ 61,350,304	\$ 63,172,831	\$ 21,333,077	\$ 331,166,889
TOTAL FIRMS	\$ 79,526,041	\$ 123,688,568	\$ 67,600,381	\$ 70,809,959	\$ 28,815,191	\$ 370,440,141
Business Ownership Classification	2019 (%)	2020 (%)	2021 (%)	2022 (%)	2023 (%)	TOTAL (%)
African American	1.33%	2.45%	1.36%	4.36%	14.96%	3.35%
Asian American	0.04%	0.00%	0.00%	0.01%	0.00%	0.01%
Hispanic American	2.12%	4.57%	3.37%	3.36%	4.17%	3.56%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	3.50%	7.02%	4.73%	7.73%	19.13%	6.92%
White Woman	3.57%	2.91%	4.52%	3.06%	6.84%	3.68%
TOTAL M/WBE	7.07%	9.93%	9.25%	10.79%	25.97%	10.60%
Non-M/WBE	92.93%	90.07%	90.75%	89.21%	74.03%	89.40%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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b) *Professional Services (CCNA)*

Table 24 shows that \$83,391,998 was spent with Professional Services (CCNA) firms during the Study Period, with M/WBE firms receiving \$16,908,943 (20.15%) and Non-M/WBE owned firms receiving \$67,023,055 (79.85%). Among all M/WBE groups across the five Industry Categories, Asian American-owned firms received the highest percentage share of payments within Professional Services (CCNA).

Table 23 provides a breakdown of Prime Professional Services (CCNA) utilization by the number of firms, revealing that 22 distinct M/WBEs (26.51%) and 61 Non-M/WBE owned firms (73.49%) were utilized.

Table 22 summarizes the average dollars paid per firm within each Study Group, derived from the figures in Tables 23 and 24.

**Table 22: Average M/WBE Prime Spend in Professional Services (CCNA)
in the Relevant Geographic Market Area
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Average Firm Spend
African American	\$ 31,848
Asian American	\$ 965,697
Hispanic American	\$ 664,331
Native American	\$ -
TOTAL MINORITY	\$ 689,791
White Woman	\$ 1,267,640
TOTAL M/WBE	\$ 768,588
Non-M/WBE	\$ 1,098,739
TOTAL FIRMS	\$ 1,011,229

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**Table 23: Number of Prime Professional Services (CCNA) Firms
in the Relevant Geographic Market Area
Disaggregated by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(#)	(#)	(#)	(#)	(#)	(#)
African American	2	2	2	3	2	4
Asian American	6	7	8	10	7	10
Hispanic American	2	3	3	2	5	5
Native American	0	0	0	0	0	0
TOTAL MINORITY	10	12	13	15	14	19
White Woman	3	3	2	2	2	3
TOTAL M/WBE	13	15	15	17	16	22
Non-M/WBE	44	42	43	40	33	61
TOTAL FIRMS	57	57	58	57	49	83
Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(%)	(%)	(%)	(%)	(%)	(%)
African American	3.51%	3.51%	3.45%	5.26%	4.08%	4.82%
Asian American	10.53%	12.28%	13.79%	17.54%	14.29%	12.05%
Hispanic American	3.51%	5.26%	5.17%	3.51%	10.20%	6.02%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	17.54%	21.05%	22.41%	26.32%	28.57%	22.89%
White Woman	5.26%	5.26%	3.45%	3.51%	4.08%	3.61%
TOTAL M/WBE	22.81%	26.32%	25.86%	29.82%	32.65%	26.51%
Non-M/WBE	77.19%	73.68%	74.14%	70.18%	67.35%	73.49%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table 24: Utilization Analysis of Prime Professional Services (CCNA)
in the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 5,690	\$ 35,428	\$ 22,328	\$ 57,506	\$ 6,440	\$ 127,393
Asian American	\$ 1,057,543	\$ 2,855,350	\$ 3,550,974	\$ 1,379,809	\$ 813,297	\$ 9,656,973
Hispanic American	\$ 516,020	\$ 1,193,086	\$ 652,811	\$ 659,244	\$ 300,494	\$ 3,321,656
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 1,579,254	\$ 4,083,865	\$ 4,226,114	\$ 2,096,559	\$ 1,120,230	\$ 13,106,022
White Woman	\$ 993,546	\$ 1,552,383	\$ 741,474	\$ 387,586	\$ 127,932	\$ 3,802,921
TOTAL M/WBE	\$ 2,572,800	\$ 5,636,247	\$ 4,967,588	\$ 2,484,145	\$ 1,248,162	\$ 16,908,943
Non-M/WBE	\$ 13,893,119	\$ 27,205,784	\$ 14,691,208	\$ 8,016,383	\$ 3,216,560	\$ 67,023,055
TOTAL FIRMS	\$ 16,465,920	\$ 32,842,032	\$ 19,658,796	\$ 10,500,528	\$ 4,464,722	\$ 83,931,998
Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	0.03%	0.11%	0.11%	0.55%	0.14%	0.15%
Asian American	6.42%	8.69%	18.06%	13.14%	18.22%	11.51%
Hispanic American	3.13%	3.63%	3.32%	6.28%	6.73%	3.96%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	9.59%	12.43%	21.50%	19.97%	25.09%	15.62%
White Woman	6.03%	4.73%	3.77%	3.69%	2.87%	4.53%
TOTAL M/WBE	15.63%	17.16%	25.27%	23.66%	27.96%	20.15%
Non-M/WBE	84.37%	82.84%	74.73%	76.34%	72.04%	79.85%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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c) *Professional Services (Non-CCNA)*

Table 27 shows that \$77,341,945 was allocated to Professional Services (Non-CCNA), with \$3,731,158 (4.82%) being spent with M/WBE firms and \$73,610,787 (95.18%) with Non-M/WBE owned firms. Among the five Industry Categories, M/WBE firms received the smallest percentage of payments in Professional Services (Non-CCNA).

Table 26 further breaks down Professional Services (Non-CCNA) utilization by the number of firms, demonstrating that 24 unique M/WBEs (14.55%) and 141 Non-M/WBE owned firms (85.45%) were utilized over the five years from 2019 to 2023.

Using the firm counts and expenditure data from Tables 26 and 27, Table 25 provides the average payment per firm across Study Groups.

**Table 25: Average M/WBE Prime Spend in Professional Services (Non-CCNA)
in the Relevant Geographic Market Area
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Average Firm Spend
African American	\$ 37,435
Asian American	\$ 794,586
Hispanic American	\$ 234,844
Native American	\$ -
TOTAL MINORITY	\$ 164,401
White Woman	\$ 92,915
TOTAL M/WBE	\$ 155,465
Non-M/WBE	\$ 522,062
TOTAL FIRMS	\$ 468,739

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**Table 26: Number of Prime Professional Services (Non-CCNA) Firms
in the Relevant Geographic Market Area
Disaggregated by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(#)	(#)	(#)	(#)	(#)	(#)
African American	7	7	5	4	6	16
Asian American	2	2	2	3	3	3
Hispanic American	1	1	1	1	2	2
Native American	0	0	0	0	0	0
TOTAL MINORITY	10	10	8	8	11	21
White Woman	2	2	2	2	1	3
TOTAL M/WBE	12	12	10	10	12	24
Non-M/WBE	86	70	64	61	34	141
TOTAL FIRMS	98	82	74	71	46	165
Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(%)	(%)	(%)	(%)	(%)	(%)
African American	7.14%	8.54%	6.76%	5.63%	13.04%	9.70%
Asian American	2.04%	2.44%	2.70%	4.23%	6.52%	1.82%
Hispanic American	1.02%	1.22%	1.35%	1.41%	4.35%	1.21%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	10.20%	12.20%	10.81%	11.27%	23.91%	12.73%
White Woman	2.04%	2.44%	2.70%	2.82%	2.17%	1.82%
TOTAL M/WBE	12.24%	14.63%	13.51%	14.08%	26.09%	14.55%
Non-M/WBE	87.76%	85.37%	86.49%	85.92%	73.91%	85.45%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table 27: Utilization Analysis of Prime Professional Services (Non-CCNA)
in the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 125,690	\$ 168,436	\$ 57,482	\$ 195,378	\$ 51,981	\$ 598,967
Asian American	\$ 655,737	\$ 809,311	\$ 561,086	\$ 256,003	\$ 101,622	\$ 2,383,758
Hispanic American	\$ 94,689	\$ 171,570	\$ 98,509	\$ 82,833	\$ 22,089	\$ 469,688
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 876,116	\$ 1,149,316	\$ 717,077	\$ 534,213	\$ 175,692	\$ 3,452,413
White Woman	\$ 90,437	\$ 101,587	\$ 44,491	\$ 36,689	\$ 5,541	\$ 278,744
TOTAL M/WBE	\$ 966,552	\$ 1,250,903	\$ 761,567	\$ 570,903	\$ 181,233	\$ 3,731,158
Non-M/WBE	\$ 12,478,961	\$ 25,661,253	\$ 14,075,842	\$ 2,459,970	\$ 18,934,761	\$ 73,610,787
TOTAL FIRMS	\$ 13,445,514	\$ 26,912,156	\$ 14,837,409	\$ 3,030,873	\$ 19,115,994	\$ 77,341,945
Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	0.93%	0.63%	0.39%	6.45%	0.27%	0.77%
Asian American	4.88%	3.01%	3.78%	8.45%	0.53%	3.08%
Hispanic American	0.70%	0.64%	0.66%	2.73%	0.12%	0.61%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	6.52%	4.27%	4.83%	17.63%	0.92%	4.46%
White Woman	0.67%	0.38%	0.30%	1.21%	0.03%	0.36%
TOTAL M/WBE	7.19%	4.65%	5.13%	18.84%	0.95%	4.82%
Non-M/WBE	92.81%	95.35%	94.87%	81.16%	99.05%	95.18%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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d) *Services*

Table 30 highlights that \$129,258,798 was spent on Services, with \$34,725,490 (26.87%) allocated to M/WBE firms and \$94,533,308 (73.13%) to Non-M/WBE owned firms. Among all five Industry Categories, M/WBE firms achieved their largest percentage share of payments in Services. Also, White Woman-owned firms received the largest total payment amount in the Services Industry Category amongst all M/WBE groups.

Table 29 provides additional detail by breaking down the utilization of Prime Services firms by the number of firms, showing that 57 distinct M/WBEs (16.29%) and 293 Non-M/WBE owned firms (83.71%) were utilized.

Drawing on the data in Tables 29 and 30, Table 28 provides the average payment per firm across Study Groups.

**Table 28: Average M/WBE Prime Spend in Services
in the Relevant Geographic Market Area
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Average Firm Spend
African American	\$ 81,081
Asian American	\$ 354,933
Hispanic American	\$ 969,130
Native American	\$ -
TOTAL MINORITY	\$ 349,683
White Woman	\$ 1,487,648
TOTAL M/WBE	\$ 609,219
Non-M/WBE	\$ 322,639
TOTAL FIRMS	\$ 369,311

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**Table 29: Number of Prime Services Firms
in the Relevant Geographic Market Area
Disaggregated by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(#)	(#)	(#)	(#)	(#)	(#)
African American	15	17	20	17	9	30
Asian American	1	1	1	1	1	1
Hispanic American	8	10	10	10	7	13
Native American	0	0	0	0	0	0
TOTAL MINORITY	24	28	31	28	17	44
White Woman	8	7	7	7	5	13
TOTAL M/WBE	32	35	38	35	22	57
Non-M/WBE	177	142	134	136	84	293
TOTAL FIRMS	209	177	172	171	106	350
Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(%)	(%)	(%)	(%)	(%)	(%)
African American	7.18%	9.60%	11.63%	9.94%	8.49%	8.57%
Asian American	0.48%	0.56%	0.58%	0.58%	0.94%	0.29%
Hispanic American	3.83%	5.65%	5.81%	5.85%	6.60%	3.71%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	11.48%	15.82%	18.02%	16.37%	16.04%	12.57%
White Woman	3.83%	3.95%	4.07%	4.09%	4.72%	3.71%
TOTAL M/WBE	15.31%	19.77%	22.09%	20.47%	20.75%	16.29%
Non-M/WBE	84.69%	80.23%	77.91%	79.53%	79.25%	83.71%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table 30: Utilization Analysis of Prime Services
in the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 751,298	\$ 822,736	\$ 509,974	\$ 308,525	\$ 39,911	\$ 2,432,444
Asian American	\$ 77,581	\$ 141,880	\$ 86,064	\$ 18,793	\$ 30,617	\$ 354,933
Hispanic American	\$ 2,653,598	\$ 3,797,197	\$ 2,822,876	\$ 2,716,946	\$ 608,071	\$ 12,598,688
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 3,482,477	\$ 4,761,812	\$ 3,418,913	\$ 3,044,264	\$ 678,599	\$ 15,386,065
White Woman	\$ 4,288,251	\$ 6,940,790	\$ 4,024,898	\$ 2,983,642	\$ 1,101,844	\$ 19,339,425
TOTAL M/WBE	\$ 7,770,727	\$ 11,702,603	\$ 7,443,811	\$ 6,027,906	\$ 1,780,443	\$ 34,725,490
Non-M/WBE	\$ 20,759,416	\$ 29,880,748	\$ 19,682,228	\$ 18,575,003	\$ 5,635,912	\$ 94,533,308
TOTAL FIRMS	\$ 28,530,143	\$ 41,583,351	\$ 27,126,039	\$ 24,602,909	\$ 7,416,355	\$ 129,258,798
Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	2.63%	1.98%	1.88%	1.25%	0.54%	1.88%
Asian American	0.27%	0.34%	0.32%	0.08%	0.41%	0.27%
Hispanic American	9.30%	9.13%	10.41%	11.04%	8.20%	9.75%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	12.21%	11.45%	12.60%	12.37%	9.15%	11.90%
White Woman	15.03%	16.69%	14.84%	12.13%	14.86%	14.96%
TOTAL M/WBE	27.24%	28.14%	27.44%	24.50%	24.01%	26.87%
Non-M/WBE	72.76%	71.86%	72.56%	75.50%	75.99%	73.13%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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e) *Goods/Commodities*

As shown in Table 33, Palm Beach County spent a total of \$250,583,602 on Goods/Commodities, with \$13,185,028 (5.26%) allocated to M/WBE firms and \$237,398,575 (94.74%) to Non-M/WBE owned firms.

Table 32 breaks down the utilization of Prime Goods/Commodities firms by the number of firms, revealing that 45 M/WBE firms (11.28%) and 354 Non-M/WBE owned firms (88.72%) were utilized during the Study Period.

Table 31 provides the average payment per firm across Study Groups based on the distribution of dollars and number of firms in this Industry Category.

**Table 31: Average M/WBE Prime Spend in Goods/Commodities
in the Relevant Geographic Market Area
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Average Firm Spend
African American	\$ 16,731
Asian American	\$ 1,724,627
Hispanic American	\$ 322,948
Native American	\$ -
TOTAL MINORITY	\$ 473,280
White Woman	\$ 135,256
TOTAL M/WBE	\$ 293,001
Non-M/WBE	\$ 670,617
TOTAL FIRMS	\$ 628,029

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table 32: Number of Prime Goods/Commodities Firms
in the Relevant Geographic Market Area
Disaggregated by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(#)	(#)	(#)	(#)	(#)	(#)
African American	3	2	4	4	3	8
Asian American	2	3	3	3	4	4
Hispanic American	6	7	8	6	3	9
Native American	0	0	0	0	0	0
TOTAL MINORITY	11	12	15	13	10	21
White Woman	17	17	13	16	10	24
TOTAL M/WBE	28	29	28	29	20	45
Non-M/WBE	231	211	218	194	106	354
TOTAL FIRMS	259	240	246	223	126	399
Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(%)	(%)	(%)	(%)	(%)	(%)
African American	1.16%	0.83%	1.63%	1.79%	2.38%	2.01%
Asian American	0.77%	1.25%	1.22%	1.35%	3.17%	1.00%
Hispanic American	2.32%	2.92%	3.25%	2.69%	2.38%	2.26%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	4.25%	5.00%	6.10%	5.83%	7.94%	5.26%
White Woman	6.56%	7.08%	5.28%	7.17%	7.94%	6.02%
TOTAL M/WBE	10.81%	12.08%	11.38%	13.00%	15.87%	11.28%
Non-M/WBE	89.19%	87.92%	88.62%	87.00%	84.13%	88.72%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Griffin & Strong, 2025

**Table 33: Utilization Analysis of Prime Goods/Commodities
in the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Calendar Year
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 12,161	\$ 34,986	\$ 41,221	\$ 23,614	\$ 21,862	\$ 133,845
Asian American	\$ 1,729,442	\$ 2,460,311	\$ 1,299,711	\$ 1,026,086	\$ 382,960	\$ 6,898,509
Hispanic American	\$ 642,455	\$ 915,196	\$ 583,956	\$ 698,685	\$ 66,243	\$ 2,906,536
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 2,384,058	\$ 3,410,493	\$ 1,924,889	\$ 1,748,385	\$ 471,065	\$ 9,938,890
White Woman	\$ 401,226	\$ 1,021,582	\$ 712,151	\$ 669,923	\$ 441,256	\$ 3,246,138
TOTAL M/WBE	\$ 2,785,284	\$ 4,432,075	\$ 2,637,040	\$ 2,418,308	\$ 912,321	\$ 13,185,028
Non-M/WBE	\$ 76,732,349	\$ 70,146,306	\$ 35,288,220	\$ 43,121,067	\$ 12,110,633	\$ 237,398,575
TOTAL FIRMS	\$ 79,517,633	\$ 74,578,380	\$ 37,925,260	\$ 45,539,375	\$ 13,022,954	\$ 250,583,602
Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	0.02%	0.05%	0.11%	0.05%	0.17%	0.05%
Asian American	2.17%	3.30%	3.43%	2.25%	2.94%	2.75%
Hispanic American	0.81%	1.23%	1.54%	1.53%	0.51%	1.16%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	3.00%	4.57%	5.08%	3.84%	3.62%	3.97%
White Woman	0.50%	1.37%	1.88%	1.47%	3.39%	1.30%
TOTAL M/WBE	3.50%	5.94%	6.95%	5.31%	7.01%	5.26%
Non-M/WBE	96.50%	94.06%	93.05%	94.69%	92.99%	94.74%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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2. Total Utilization and No-Goals Analysis Using State Funded Contracts

The County tracked subcontractor payments during the Study Period, including those made to both M/WBE and Non-M/WBE firms for both exempt and non-exempt awards. Using only awards with local funding, G&S conducted a Total Utilization analysis by combining prime contract dollars with subcontract dollars, after subtracting subcontract dollars from prime contract dollars on a contract-by-contract basis.¹³⁷ G&S conducted a Total Utilization analysis to observe what percentage of all dollars overall went to M/WBEs. Additionally, Appendix J provides a view of subcontractor only utilization using subcontractor payments associated with locally funded awards.

Since there were no goals set on any State funded contracts, G&S analyzed those awards separately in a No-Goals Analysis using state funded projects to determine how prime contractors utilize M/WBEs when there are no goals.

a) Total Utilization by Race/Ethnicity/Gender using Local Contracts

While subcontractor data was tracked across all five Industry Categories, the Total Utilization analysis was limited to Construction, Professional Services (CCNA), and Services, as prime contractors with linked subcontractor payments were predominantly in these three categories.¹³⁸

Total Utilization is the percentage of dollars awarded to combined Prime Contractors (in the Relevant Geographic Market Area) and Subcontractors, by ethnic/gender category, after removing subcontract dollars from prime dollars on a contract-by-contract basis.

- **Construction:** M/WBE firms received \$48,076,327 (12.98%) in Total Utilization, while Non-M/WBE owned firms received \$322,363,814 (87.02%). Among the three Industry Categories included for Total Utilization, M/WBE firms achieved their largest percentage share of subcontractor payments in Construction.
- **Professional Services (CCNA):** Non-M/WBE owned firms received \$61,750,045 (73.57%), and M/WBE firms were paid \$22,181,953 (26.43%). For the three included Industry Categories in Total Utilization, Asian American-owned firms received the largest percentage share in Professional Services (CCNA) amongst all M/WBE groups.
- **Services:** Non-M/WBE owned firms received \$93,109,508 (72.03%) while M/WBE firms received

¹³⁷ For example, if there was one African American owned prime contract at \$1,000, Prime Contractor Utilization counts the whole \$1,000 toward African American owned firms. In Total Utilization, if the Prime Contractor subcontracts with one Hispanic American owned subcontractor for \$300 and a White Woman owned subcontractor has \$200 in subcontracts, then in Total Utilization: (\$1,000-\$500)=\$500 attributed to African American-owned Prime Contractor and \$300 attributed to Hispanic American owned subcontractor and \$200 attributable to the White Woman owned category.

¹³⁸ The data linking subcontractor payments to specific prime contractor awards was provided to G&S by the County in order for G&S to link the prime contractor awards to prime contractor payments. Where those prime contractor awards did not match payments from the County financial system, they were not included in the analysis.

\$36,149,290 (27.97%). Within M/WBEs, MBE firms received \$16,809,865 (13.00%), and White Woman-owned firms received \$19,339,425 (14.96%).

**Table 34: Total Utilization Analysis
in the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Industry Category
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Construction	Professional Services (CCNA)	Services	TOTAL
	(\$)	(\$)	(\$)	(\$)
African American	\$ 7,497,513	\$ 5,092,347	\$ 2,432,444	\$ 15,022,304
Asian American	\$ 267,481	\$ 9,503,853	\$ 354,933	\$ 10,126,267
Hispanic American	\$ 20,309,878	\$ 4,068,642	\$ 14,022,488	\$ 38,401,008
Native American	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 28,074,872	\$ 18,664,842	\$ 16,809,865	\$ 63,549,578
White Woman	\$ 20,001,456	\$ 3,517,111	\$ 19,339,425	\$ 42,857,992
TOTAL M/WBE	\$ 48,076,327	\$ 22,181,953	\$ 36,149,290	\$ 106,407,571
Non-M/WBE	\$ 322,363,814	\$ 61,750,045	\$ 93,109,508	\$ 477,223,366
TOTAL FIRMS	\$ 370,440,141	\$ 83,931,998	\$ 129,258,798	\$ 583,630,936
Business Ownership Classification	Construction	Professional Services (CCNA)	Services	TOTAL
	(%)	(%)	(%)	(%)
African American	2.02%	6.07%	1.88%	2.57%
Asian American	0.07%	11.32%	0.27%	1.74%
Hispanic American	5.48%	4.85%	10.85%	6.58%
Native American	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	7.58%	22.24%	13.00%	10.89%
White Woman	5.40%	4.19%	14.96%	7.34%
TOTAL M/WBE	12.98%	26.43%	27.97%	18.23%
Non-M/WBE	87.02%	73.57%	72.03%	81.77%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%

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Note: G&S uses full decimal numbers, so automatic rounding may cause differences within the tables.

b) *Subcontractor No-Goals Analysis Using State Funded Contracts by Race/Ethnicity/Gender*

G&S also received subcontractor payments for state funded contracts—which are contracts not subject to race- and gender-conscious participation goals—during the Study Period. Table 35 presents an analysis of Subcontractor Utilization on these state funded contracts. The purpose of this analysis is to examine whether disparities in subcontracting participation exist in the absence of targeted goals.

Subcontractor Utilization refers to the percentage of dollars paid to subcontractors, by ethnic/gender category, based on tracked subcontractor payments associated with prime contracts in the Relevant Geographic Market Area.

The dataset for this analysis was limited in scope: of the 87 total payments to subcontractors under state funded contracts, there were 19 unique subcontractors paid. Only 79 total payments and 15 unique firms remained after limiting the analysis to the Relevant Geographic Market Area. This small volume of data was discussed with County representatives, who indicated that the low number of subcontractor payments might be expected due to the nature of these state funded projects. Firms on these contracts are not required to subcontract and therefore may have self-performed the work.

Due to the limited data available, utilization tables (shown in Table 35) could only be developed for two Industry Categories—Construction and Professional Services (CCNA). The findings offer a preliminary look at subcontracting patterns on projects awarded without race- or gender-conscious provisions.

As presented in Table 35, Minority-owned firms accounted for 6.25% of payments in Construction, 3.30% in Professional Services (CCNA), and 5.25% total across both Industry Categories. White Woman-owned firms accounted for a substantial amount in Construction at 26.92%, 1.21% in Professional Services (CCNA), and 18.23% across both Industry Categories.

**Table 35: Subcontractor No-Goals Analysis Using State Funded Contracts
in the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Industry Category
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Construction	Professional Services (CCNA)	TOTAL
	(\$)	(\$)	(\$)
African American	\$ 0	\$ 0	\$ 0
Asian American	\$ 0	\$ 2,500	\$ 2,500
Hispanic American	\$ 33,348	\$ 6,500	\$ 39,848
Native American	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 33,348	\$ 9,000	\$ 42,348
White Woman	\$ 143,667	\$ 3,304	\$ 146,971
TOTAL M/WBE	\$ 177,015	\$ 12,304	\$ 189,319
Non-M/WBE	\$ 356,730	\$ 260,119	\$ 616,849
TOTAL FIRMS	\$ 533,745	\$ 272,423	\$ 806,168
Business Ownership Classification	Construction	Professional Services (CCNA)	TOTAL
	(%)	(%)	(%)
African American	0.00%	0.00%	0.00%
Asian American	0.00%	0.92%	0.31%
Hispanic American	6.25%	2.39%	4.94%
Native American	0.00%	0.00%	0.00%
TOTAL MINORITY	6.25%	3.30%	5.25%
White Woman	26.92%	1.21%	18.23%
TOTAL M/WBE	33.16%	4.52%	23.48%
Non-M/WBE	66.84%	95.48%	76.52%
TOTAL FIRMS	100.00%	100.00%	100.00%

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H. Determination of Disparity

This section of the report addresses the crucial question of whether, and to what extent, there is disparity between the utilization of M/WBEs as measured against their Availability in the Relevant Geographic Market Area.

Disparity Indices are the differences between the percentage of the Palm Beach County's Utilization of M/WBEs during the Study Period and the Availability percentage of M/WBEs.

1. Methodology

The statistical approach to answer this question is to assess the existence and extent of disparity by comparing the M/WBE utilization percentages (by dollars) to the percentage of the total pool of M/WBE firms in the Relevant Geographic Market Area. The actual disparity derived as a result of employing this approach is measured by use of a Disparity Index (DI).

The Disparity Index is defined as the ratio of the percentage of M/WBE firms utilized (U) divided by the percentage of such firms available in the marketplace, (A):

Let: U =Utilization percentage for the M/WBE group
 A =Availability percentage for the M/WBE group
 DI =Disparity Index for the M/WBE group
 DI =U/A

The results obtained by a disparity analysis will result in one of three conclusions: Overutilization, Underutilization, or Parity. Underutilization is when the Disparity Index is below one hundred. Overutilization is when the Disparity Index is over one hundred. Parity or the absence of disparity is when the Disparity Index is one hundred (100) which indicates that the utilization percentage equals the Availability percentage. In situations where there is Availability, but no utilization, the corresponding disparity index will be zero. Finally, in cases where there is neither Utilization nor Availability, the corresponding disparity index is undefined and designated by a dash (-) or (Small Number) symbol. Disparity analyses are presented separately for each Industry Category and for each race/ethnicity/gender group.

2. Determining the Significance of Disparity Indices

The determination that a particular ethnic or gender group has been overutilized or underutilized is not, standing alone, proof of discrimination. Typically, the determination of whether a disparity is "statistically significant" can be based on the depth of the disparity in that any disparity index that is less than 80 is considered to be a statistically significant Underutilization, and any disparity index over 100 is considered to be an Overutilization. The disparity indices impact as designated in the tables below as "Overutilization," "Underutilization," or "Parity" have been bolded to indicate such statistically significant impact.

G&S uses a statistical test that considers whether the typical disparity index across all vendor categories is equal to parity. This constitutes a null hypothesis of “Parity,” and the test estimates the probability that the typical disparity index departs from unity, and the magnitude of the calculated test statistic indicates whether there is typically Underutilization or Overutilization. Statistical significance tests were performed for each disparity index derived for each M/WBE group, and in each Industry Category. This approach to statistical significance is consistent with the case law.

The existence of a statistically significant disparity between the Availability and Utilization of Minority or White Woman-owned businesses which are determined to likely be the result of the owners’ race, ethnicity, or gender will establish an inference that ongoing effects of discrimination are adversely affecting market outcomes for underutilized groups. Accordingly, such findings will impact the recommendations provided in this Study. G&S will, in such a case, make recommendations for consideration of appropriate and narrowly tailored race-, ethnicity-, and gender-neutral remedies for this discrimination to give all firms equal access to public contracting within Palm Beach County. G&S will also, if appropriate, recommend narrowly tailored race-, ethnicity-, and gender-conscious remedies to ameliorate identified barriers and forms of discrimination likely affected by such discrimination. If no statistically significant disparity is found to exist, or if such a disparity is not determined to be a likely result of firm owners’ race, ethnicity, or gender upon their success in the marketplace, G&S may still make recommendations to support the continuation of engagement, outreach, small business development, and non-discrimination policies in the purchasing processes of Palm Beach County.

3. Prime Disparity Indices

The results of the statistical analysis of utilization data for five (5) Industry Categories are presented in Table 36. The outcomes of the statistical tests are colorized for easy understanding. The results are as follows:

- African American-owned firms were underutilized across all Industry Categories.
- Asian American-owned businesses were overutilized in Professional Services (CCNA), Professional Services (Non-CCNA), and Goods/Commodities. They were underutilized in Construction and Services.
- Hispanic American-owned vendors were overutilized in Services and were underutilized in all other Industry Categories – only in Construction was the underutilization not statistically significant.
- White Woman-owned firms were overutilized in Construction, Professional Services (CCNA), and Services while being underutilized in Professional Services (Non-CCNA) and Goods/Commodities.
- Non-M/WBE-owned firms were overutilized in Construction, Professional Services (Non-CCNA), and Goods/Commodities and showed non-significant underutilization in Professional Services (CCNA) and Services.

Apart from Native American-owned firms, which had neither Utilization nor Availability in all but one Industry Category, all other business ownership groups exhibited a mix of under and overutilization. Detailed analysis tables are provided in Appendix F, Tables F-1 through F-5.

Table 36: Prime Vendor Disparity Analysis Summary
(Using Availability Compared to Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Business Ownership Classification	Industry Categories				
	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities
African American	62.44*	4.23*	12.24*	30.63*	1.45*
Asian American	2.03*	333.67	462.70	69.45	514.81
Hispanic American	80.45	79.70	30.39*	400.60	64.48
Native American	-	-	0.00	-	-
TOTAL MINORITY	66.74*	130.13	49.18*	132.67	65.80*
White Woman	131.53	131.40	11.86*	806.46	32.50*
TOTAL M/WBE	80.50	130.41	39.81*	248.12	52.54*
Non-M/WBE	102.96	94.44	108.30	82.01	105.28

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Legend:

* Statistically Significant Underutilization (Confidence interval of 95% and probability of error of less than 5%)

Statistically Significant Underutilization (Disparity percentage below 80%).

Disparity, but not Statistically Significant (Disparity percentage 80% to 99.9%).

Overutilization (Disparity percentage over 100%).

No color is Parity.

4. Disparity Indices – Total Utilization

Like the Prime Vendor analysis, G&S performed statistical analysis on Total Utilization within the three (3) Industry Categories that were included in Total Utilization: Construction, Profession Services (CCNA), and Services. The results, as shown in Table 37, are as follows:

- Both African American and Asian American-owned firms in Construction and Services were underutilized while both being overutilized in Professional Services (CCNA).
- Hispanic American-owned firms were overutilized in Construction and Services and were underutilized in Professional Services (CCNA), but the underutilization was not statistically significant.
- White Woman-owned firms were overutilized in all three Industry Categories that were included in Total Utilization.
- Minority-owned firms overall were overutilized in Professional Services (CCNA) and Services but were underutilized in Construction—though not at a statistically significant level. M/WBE-owned firms had the same results as Minority-owned firms.
- Non-M/WBE owned firms were underutilized, but not at a statistically significant level, in Professional Services (CCNA) and Services while being at parity in Construction.

Detailed analysis tables are included in Appendix F, Tables F-6 through F-8.

Table 37: Total Utilization Disparity Analysis Summary
(Using Availability compared to Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Business Ownership Classification	Industry Categories		
	Construction	Professional Services (CCNA)	Services
African American	37.75*	169.18	30.63*
Asian American	12.39*	328.38	69.45
Hispanic American	123.79	97.62	445.87
Native American	-	-	-
TOTAL MINORITY	73.06*	185.32	144.95
White Woman	193.03	121.52	806.46
TOTAL M/WBE	98.54	171.08	258.30
Non-M/WBE	100.22	87.01	80.78

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Legend:

* Statistically Significant Underutilization (Confidence interval of 95% and probability of error of less than 5%).

Statistically Significant Underutilization (Disparity percentage below 80%).

Disparity, but not Statistically Significant (Disparity percentage 80% to 99.9%).

Overutilization (Disparity percentage over 100%).

No color is Parity.

5. Disparity Indices – Subcontractor Utilization of State Funded Contracts

G&S performed statistical analysis on Subcontractor Utilization of state funded contracts within Construction and Professional Services (CCNA). The results, as shown in Table 38 on the next page, are as follows:

- All M/WBE groups are underutilized across both Industry Categories aside from Hispanic American and White Woman-owned firms in Construction where both groups are overutilized.

Detailed analysis tables are included in Appendix F, Table F-9.

Table 38: Subcontractor No-Goals Analysis Using State Funded Contracts
Disparity Analysis Summary
 (State Payment Dollars, CY2019-CY2023)
 Palm Beach County 2025 Disparity Study

Business Ownership Classification	Industry Categories	
	Construction	Professional Services (CCNA)
African American	0.00*	0.00*
Asian American	0.00*	26.61*
Hispanic American	141.07	48.05*
Native American	-	-
TOTAL MINORITY	60.23*	27.53*
White Woman	962.28	35.17*
TOTAL M/WBE	251.82	23.24*
Non-M/WBE	76.97*	112.93

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Legend:

* Statistically Significant Underutilization (Confidence interval of 95% and probability of error of less than 5%).

Statistically Significant Underutilization (Disparity percentage below 80%).

Disparity, but not Statistically Significant (Disparity percentage 80% to 99.9%).

Overutilization (Disparity percentage over 100%).

No color is Parity.

6. Disparity Indices – Threshold Analysis of Prime Awards

G&S also conducted disparity analyses for prime contracts across the following threshold ranges:

- Under \$1 million
- Under \$500,000

The analysis reveals a complex and varied pattern of underutilization and overutilization across different business ownership classifications, industries, and contract thresholds. The results include:

- Under \$1 million
 - a. In Construction, all MBE groups were underutilized while White Woman and Non-M/WBE owned firms were overutilized.
 - b. The disparity analysis for Professional Services (CCNA) revealed that Asian American and Hispanic American-owned firms were overutilized while African American, White Woman-, and Non-M/WBE owned firms were underutilized. The underutilization of White Woman-owned firms was not statistically significant.
 - c. For awards under \$1 million in Professional Services (Non-CCNA), Asian American and Hispanic American-owned firms were overutilized while every other Study Group was

underutilized. The underutilization of African American-owned firms was not statistically significant.

- d. In Services, African American and Non-M/WBE owned firms were underutilized while every other Study Group was overutilized. The underutilization of M/WBE-owned firms was not statistically significant.
 - e. In Goods/Commodities, Asian American-owned firms were overutilized whereas every other M/WBE group was underutilized at a statistically significant level. Non-M/WBE owned firms were also overutilized.
- Under \$500,000
 - a. For awards under \$500,000 in Construction, White Woman and Non-M/WBE owned firms were overutilized while all MBE groups were underutilized.
 - b. In Professional Services (CCNA), African American and Non-M/WBE owned firms were underutilized while all other Study Groups were overutilized.
 - c. The disparity analysis for Professional Services (Non-CCNA) shows that amongst M/WBEs, Native American and White Woman-owned firms were underutilized while the other African American, Asian American, and Hispanic American-owned firms were overutilized. Non-M/WBE owned firms were underutilized.
 - d. In Services, African American and Non-M/WBE owned firms were underutilized while the remaining Study Groups were overutilized.
 - e. In Goods/Commodities, Asian American and Non-M/WBE owned firms were overutilized while all other Study Groups were underutilized—the underutilization of Hispanic American-owned firms was not statistically significant.

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Tables 39 and 40 summarize Disparity Indices, with 'X' indicating statistically significant underutilization and '*' indicating underutilization that is not statistically significant across Business Ownership and Industry Categories during the Study Period. A '-' indicates that there was no Availability for a Study Group in an Industry Category, and thus, there was no disparity to analyze. A blank cell indicates overutilization. Detailed analysis tables are in Appendix F, Tables F-10 through F-19.

a) Awards Under \$1 million

Table 39: Prime Awards Utilization Analysis Summary
(Using Prime Award Dollars Under \$1m, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Business Ownership Classification	Industry Categories				
	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities
African American	X	X	*	X	X
Asian American	X				
Hispanic American	X				X
Native American	-	-	X	-	-
TOTAL MINORITY	X				X
White Woman		*	X		X
TOTAL M/WBE	*				X
Non-M/WBE		X	X	*	

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b) Awards Under \$500k

Table 40: Prime Awards Utilization Analysis Summary
(Using Prime Award Dollars Under \$500k, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Business Ownership Classification	Industry Categories				
	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities
African American	X	X		X	X
Asian American	X				
Hispanic American	X				*
Native American	-	-	X	-	-
TOTAL MINORITY	X				X
White Woman			X		X
TOTAL M/WBE	*				X
Non-M/WBE		X	X	*	

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I. Threshold Analysis

G&S conducted a Threshold analysis on all contracts with a total value of \$5,000 or higher during the Study Period (CY2019-CY2023). The Threshold Analysis is a practical way of showing the contracts sizes and whether there are opportunities for small businesses to participate as prime contractors.

Table 41 depicts the results of the Threshold Analysis for Construction awards. As shown in Table 41, nearly three-fourths of the Construction contracts were between \$5,000 and \$50,000, and 2.89% of the Construction contracts were over \$1 million and accounted for 71.65% of the dollars. Despite Construction contracts over \$1 million accounting for 2.89% of the contracts, it is worth noting that their total is 150 with 47 being between over \$2 million and \$5 million, and 30 contracts over \$5 million.

Table 41: Threshold Analysis - Number of Awards, Prime Contractor Utilization, Construction
(Using Prime Award Dollars Over \$5,000, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Purchase Order Threshold	Number of Purchase Orders	Dollars	Percent of Purchase Orders	Percent of Dollars
\$5,000 - \$10,000	1601	\$ 11,467,529	30.81%	1.11%
\$10,000.01 - \$50,000	2201	\$ 50,695,905	42.36%	4.89%
\$50,000.01 - \$100,000	599	\$ 43,657,495	11.53%	4.21%
\$100,000.01 - \$250,000	387	\$ 61,504,365	7.45%	5.93%
\$250,000.01 - \$500,000	153	\$ 52,900,589	2.94%	5.10%
\$500,000.01 - \$750,000	64	\$ 38,568,834	1.23%	3.72%
\$750,000.01 - \$1,000,000	41	\$ 35,259,508	0.79%	3.40%
\$1,000,000.01 - \$1,500,000	45	\$ 56,063,842	0.87%	5.40%
\$1,500,000.01 - \$2,000,000	28	\$ 49,976,957	0.54%	4.82%
\$2,000,000.01 - \$2,500,000	10	\$ 22,086,633	0.19%	2.13%
\$2,500,000.01 - \$5,000,000	37	\$ 128,383,102	0.71%	12.38%
Over \$5,000,000	30	\$ 486,705,408	0.58%	46.92%
Total	5196	\$ 1,037,270,169	100.00%	100.00%

Griffin & Strong, 2025

The Threshold analysis of Professional Services (CCNA) contracts is presented in Table 42. Of the 924 total contracts analyzed, over half were between \$5,000 and \$50,000. Table 42 also shows that 4.12% of the Professional Services (CCNA) contracts were over \$1 million yet accounted for 49.24% of all dollars.

Table 42: Threshold Analysis - Number of Awards, Prime Contractor Utilization, Professional Services (CCNA)
(Using Prime Award Dollars Over \$5,000, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Purchase Order Threshold	Number of Purchase Orders	Dollars	Percent of Purchase Orders	Percent of Dollars
\$5,000 - \$10,000	137	\$ 988,055	14.83%	0.57%
\$10,000.01 - \$50,000	358	\$ 9,814,119	38.74%	5.64%
\$50,000.01 - \$100,000	165	\$ 12,504,451	17.86%	7.19%
\$100,000.01 - \$250,000	134	\$ 21,550,744	14.50%	12.39%
\$250,000.01 - \$500,000	60	\$ 21,003,652	6.49%	12.08%
\$500,000.01 - \$750,000	20	\$ 12,233,315	2.16%	7.04%
\$750,000.01 - \$1,000,000	12	\$ 10,188,931	1.30%	5.86%
\$1,000,000.01 - \$1,500,000	14	\$ 16,562,734	1.52%	9.53%
\$1,500,000.01 - \$2,000,000	6	\$ 9,948,337	0.65%	5.72%
\$2,000,000.01 - \$2,500,000	10	\$ 22,320,757	1.08%	12.84%
\$2,500,000.01 - \$5,000,000	7	\$ 23,489,867	0.76%	13.51%
Over \$5,000,000	1	\$ 13,278,184	0.11%	7.64%
Total	924	\$ 173,883,146	100.00%	100.00%

Griffin & Strong, 2025

Table 43 displays the results of the Threshold analysis for Professional Services (Non-CCNA) contracts. Over 90% of the contracts were between \$5,000 and \$250,000 but only accounted for 40.99% of the dollars spent in Professional Services (Non-CCNA) contracts. Contracts over \$1 million accounted for 24.23% of all dollars while only representing 1.57% of all contracts.

Table 43: Threshold Analysis - Number of Awards, Prime Contractor Utilization, Professional Services (Non-CCNA)
(Using Prime Award Dollars Over \$5,000, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Purchase Order Threshold	Number of Purchase Orders	Dollars	Percent of Purchase Orders	Percent of Dollars
\$5,000 - \$10,000	285	\$ 2,024,285	27.91%	2.28%
\$10,000.01 - \$50,000	443	\$ 10,505,885	43.39%	11.85%
\$50,000.01 - \$100,000	102	\$ 7,126,690	9.99%	8.04%
\$100,000.01 - \$250,000	112	\$ 16,688,944	10.97%	18.82%
\$250,000.01 - \$500,000	39	\$ 13,598,342	3.82%	15.34%
\$500,000.01 - \$750,000	14	\$ 8,653,205	1.37%	9.76%
\$750,000.01 - \$1,000,000	10	\$ 8,587,609	0.98%	9.69%
\$1,000,000.01 - \$1,500,000	14	\$ 17,671,520	1.37%	19.93%
\$1,500,000.01 - \$2,000,000	1	\$ 1,659,582	0.10%	1.87%
\$2,000,000.01 - \$2,500,000	1	\$ 2,152,143	0.10%	2.43%
\$2,500,000.01 - \$5,000,000	0	\$ 0	0.00%	0.00%
Over \$5,000,000	0	\$ 0	0.00%	0.00%
Total	1021	\$ 88,668,205	100.00%	100.00%

Griffin & Strong, 2025

The Threshold analysis for Services contracts is presented below in Table 44. Of all the Services contracts, 84.05% of them are between \$5,000 and \$50,000 while accounting for 21.19% of the dollars. In Services, 24 contracts, or 0.63% were over \$1 million dollars, and they accounted for 26.15% of all Services contracting dollars. Also worth noting is that 28.54% of Services contracting dollars were between \$100,000 and \$500,000 with the number of contracts in this range only accounting for 6.85% of all Services contracts.

**Table 44: Threshold Analysis - Number of Awards, Prime Contractor Utilization, Services
(Using Prime Award Dollars Over \$5,000, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Purchase Order Threshold	Number of Purchase Orders	Dollars	Percent of Purchase Orders	Percent of Dollars
\$5,000 - \$10,000	1653	\$ 11,595,985	43.73%	5.64%
\$10,000.01 - \$50,000	1524	\$ 31,943,442	40.32%	15.55%
\$50,000.01 - \$100,000	277	\$ 19,853,566	7.33%	9.66%
\$100,000.01 - \$250,000	182	\$ 29,076,020	4.81%	14.15%
\$250,000.01 - \$500,000	77	\$ 29,550,555	2.04%	14.39%
\$500,000.01 - \$750,000	28	\$ 16,359,869	0.74%	7.96%
\$750,000.01 - \$1,000,000	15	\$ 13,328,999	0.40%	6.49%
\$1,000,000.01 - \$1,500,000	13	\$ 16,233,286	0.34%	7.90%
\$1,500,000.01 - \$2,000,000	8	\$ 13,447,599	0.21%	6.55%
\$2,000,000.01 - \$2,500,000	0	\$ 0	0.00%	0.00%
\$2,500,000.01 - \$5,000,000	2	\$ 5,880,148	0.05%	2.86%
Over \$5,000,000	1	\$ 18,155,705	0.03%	8.84%
Total	3780	\$ 205,425,173	100.00%	100.00%

Griffin & Strong, 2025

Table 45 presents the Threshold analysis for Goods/Commodities. Of the total 12,866 contracts analyzed in this Industry Category, 84.53% were between \$5,000 and \$50,000. Furthermore, 0.34% of the contracts were over \$1 million and accounted for 14.76% of the Goods/Commodities contracting dollars.

Table 45: Threshold Analysis - Number of Awards, Prime Contractor Utilization, Goods/Commodities
(Using Prime Award Dollars Over \$5,000, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Purchase Order Threshold	Number of Purchase Orders	Dollars	Percent of Purchase Orders	Percent of Dollars
\$5,000 - \$10,000	5027	\$ 35,817,002	39.07%	6.25%
\$10,000.01 - \$50,000	5849	\$ 125,661,249	45.46%	21.93%
\$50,000.01 - \$100,000	925	\$ 64,628,291	7.19%	11.28%
\$100,000.01 - \$250,000	648	\$ 102,149,519	5.04%	17.83%
\$250,000.01 - \$500,000	274	\$ 94,181,844	2.13%	16.44%
\$500,000.01 - \$750,000	76	\$ 45,657,971	0.59%	7.97%
\$750,000.01 - \$1,000,000	23	\$ 20,317,385	0.18%	3.55%
\$1,000,000.01 - \$1,500,000	23	\$ 27,620,060	0.18%	4.82%
\$1,500,000.01 - \$2,000,000	7	\$ 11,779,808	0.05%	2.06%
\$2,000,000.01 - \$2,500,000	7	\$ 16,233,680	0.05%	2.83%
\$2,500,000.01 - \$5,000,000	5	\$ 16,906,793	0.04%	2.95%
Over \$5,000,000	2	\$ 12,032,889	0.02%	2.10%
Total	12866	\$ 572,986,488	100.00%	100.00%

Griffin & Strong, 2025

J. Conclusion

The quantitative analysis shows that there is a variety of overutilization and underutilization across different business ownership classifications and industries.

- In Prime Utilization:
 - African American-owned firms were underutilized across all Industry Categories.
 - Asian American-owned firms were underutilized in two of the five Industry Categories while being overutilized in the remaining three.
 - Hispanic American-owned firms were underutilized in every Industry Category except Services where they were overutilized.
 - White Woman and Non-M/WBE owned firms were overutilized in three of the five Industry Categories and underutilized in the other two—Non-M/WBE owned firms' underutilization was not statistically significant.
- In Total Utilization:
 - Across the three analyzed Industry Categories, African American and Asian American-owned firms were underutilized in Construction and Services but overutilized in Professional Services (CCNA), while Hispanic American and White Woman-owned firms

were generally overutilized except for Hispanic American-owned firms in Professional Services (CCNA) where they were underutilized but not at a statistically significant level.

- In Construction, Minority and M/WBE-owned firms were underutilized, but M/WBE owned firms' underutilization was not statistically significant. Minority and M/WBE owned firms were both overutilized in Professional Services (CCNA) and Services.
- Non-M/WBE firms were underutilized in Professional Services (CCNA) and Services but neither was statistically significant. They were both at parity in Construction.
- There was little to no spend at all to Professional Services (Non-CCNA) and Goods/Commodities prime firms in the subcontractor data used. Thus, neither Industry Category was included in the Total Utilization analysis.

There is overutilization of some M/WBE groups in both Prime Utilization and Total Utilization. Although there is limited data, G&S reviewed the utilization of M/WBEs as subcontractors in state funded contracts to see if the overutilization could be explained because of the program. However, even when there were no goals, there was still some overutilization of M/WBEs in subcontracting.

VI. ANALYSIS OF MARKETPLACE CONTRACTING DISPARITIES IN PALM BEACH COUNTY, FL

A. Introduction

In this section, G&S considers the market entry, public contracting and subcontracting outcomes, and relevant private/public sector outcomes of Minority- and White Women-owned firms relative to White American-owned firms in Palm Beach County.¹³⁹ G&S's analysis utilizes data from businesses that are plausibly willing, able, or have actually contracted/subcontracted with Palm Beach County with the aim of determining if the likelihood of successful contracting/subcontracting opportunities—actual and perceived—in Palm Beach County is conditioned, in a statistically significant manner, on the race, ethnicity, or gender status of firm owners. Such an analysis is a useful and important compliment to estimating simple disparity indices, which assume all things important for success and failure are equal among businesses competing for public contracts. This analysis is based on unconditional moments, that is, statistics that do not necessarily inform causality or the source of differences across such statistics. As simple disparity indices do not condition on possible confounders¹⁴⁰ of new firm entry, and success and failure in public sector contracting/subcontracting by businesses, they are only suggestive of disparate treatment, and their implied likelihood of success or failure could be biased. Further details on the G&S statistical/econometric methodology is provided in Appendix K.

The G&S econometric analysis posits that there are possible confounders of success and failure in the market for public sector contracting/subcontracting that are sources of heterogeneity, or diverse characteristics, among businesses that lead to differences in success and failure. Failure to condition on the sources of heterogeneity in success/failure in new firm formation and public sector contracting/subcontracting outcomes can leave simple disparity indices devoid of substantive policy implications as they ignore the extent to which firm owner race/ethnicity characteristics are causal factors. Disparate outcomes could possibly reflect in whole or in part, outcomes driven by disparate firm characteristics that matter fundamentally for success/failure in the formation of new firms and public sector contracting/subcontracting outcomes. As the regression specifications control for firm capacity factors common to both White American-owned businesses and Minority and White Women-owned businesses, if the race, ethnicity, or gender status of a firm owner conditions lower likelihoods of success/failure, this would be suggestive of these mostly immutable characteristics causing the observed disparities.

A broad context for considering disparities by firm ownership status can be informed by considering private sector outcomes in Palm Beach County. In general, the success and failure of Minority and White Women-owned businesses in public contracting could be conditioned by their outcomes in the private sector regarding their revenue-generating capacity. The value of a descriptive private sector analysis is that it

¹³⁹ In particular, the relevant market area is Palm Beach County, Florida. It is officially identified by a three-digit Federal Information Processing Standards (FIPS) code. The FIPS code uniquely identified counties and county equivalents in the United States, certain U.S. possessions, and certain freely associated states.

¹⁴⁰ A confounder can be defined as a variable that, when added to the regression model, changes the estimate of the association between the main independent variable of interest (exposure) and the dependent variable (outcome).

situates disparity analyses in the seminal “but-for” justification of Ayres and Vars (1998). In their consideration of the constitutionality of public affirmative programs, they posit a scenario in which private suppliers of financing systematically exclude or charge higher prices to Minority-owned businesses, which potentially increases the cost of which Minority-owned businesses can provide services required under public contracts relative to Non-Minority owned businesses.¹⁴¹ This private discrimination means that Minority and White Women-owned businesses may only have recourse to higher cost financing due to facing discrimination in private sector capital markets, which compromises the competitiveness of their bids. Such a perspective on discrimination suggests that barriers faced by Minority and White Women-owned businesses in the private sector can rationalize targeted contracting programs by political jurisdictions, as the counterfactual is that in the absence of such private sector discrimination, they would be able to better compete with other firms in bidding for public contracts.

B. Firm Type Count and Revenue Representation

Table 46 on the next page reports on firm ownership type and sales revenue for Palm Beach County from the U.S. Census Bureau’s Annual Business Survey (ABS).¹⁴² G&S’s descriptive private sector analysis considers for each identifiable firm type across the classification of race and gender and unclassifiable; representation in the population of firms and revenue across the available and relevant firm ownership type classifications.¹⁴³ Measuring at the firm level, business ownership is defined as having more than 50% of the stock or equity in the business and is categorized by sex, ethnicity, race, and publicly held and other firms not classifiable by sex, ethnicity, or race.

For Palm Beach County, Table 46 reveals that relative to White American-owned firms, the estimated firm shares of Minority- and Women-owned businesses has an upper and lower bound of approximately 23% (Women) and 0.06% (Native Hawaiian and Pacific Islanders) respectively.¹⁴⁴ As these bounds are substantially within that for firms owned by White Americans—approximately 85%—this is consistent with and suggestive of, but not necessarily causal evidence for, Minority- and Women-owned businesses facing

¹⁴¹ See: Ayres, Ian, and Fredrick E. Vars. 1998, “When does private discrimination justify public affirmative action?” *Columbia Law Review*, 98: 1577-1641., Anderson, Elizabeth S. 2002, “Integration, affirmative action, and strict scrutiny.” *New York University Law Review*, 77: 1195 -1271.

¹⁴² ABS data are publicly available at <https://www.census.gov/programs-surveys/abs/data.htm>. The ABS provides information on selected economic and demographic characteristics for businesses and business owners by sex, ethnicity, race, and veteran status. Further, the survey measures research and development (for microbusinesses), new business topics such as innovation and technology, as well as other business characteristics. The ABS is conducted jointly by the U.S. Census Bureau and the National Center for Science and Engineering Statistics within the National Science Foundation. It replaces the five-year Survey of Business Owners for employer businesses, the Annual Survey of Entrepreneurs, the Business R&D and Innovation for Microbusinesses survey, and the innovation section of the Business R&D and Innovation Survey. The most recent data for the Palm Beach County for which firm revenue data are available is for the year 2022.

¹⁴³ The data are only reportable for firms with data that can be captured without any sacrifice of confidentiality. In some instances, there are firms in revenue/sales categories for which this condition is not met, and their operating data is not reported in the publicly available version of the ABS. In this context, while this may impart a bias to Table 46, data for firms that cannot satisfy the confidentiality requirements are likely very small and account for a small percentage of overall market revenue.

¹⁴⁴ The percentages do not “add-up” to one, as the Women ownership category is not “mutually exclusive” of the other race/ethnicity/gender categories.

discriminatory barriers to entry and performance in the private sector of Palm Beach County as the market is dominated by White American-owned firms.

Table 46: Firm Ownership Type and Revenue Characteristics
Palm Beach County, FL:
2023 Census Bureau Annual Business Survey
Palm Beach County 2025 Disparity Study

Ownership Structure	Number of Firms	Firm Share (%) (approximate)	Total Revenue (\$1,000)	Total Revenue Share (%) (approximate)	Ratio of Firm Share to Revenue Share (approximate)
All	45,693	100%	\$186,208,403	100%	1.0
Women	10,668	23.3%	\$15,909,77	8.5%	2.74
White American	38,963	85.3%	\$83,362,503	44.8%	1.90
African American	1,988	4.3%	\$1,275,871	0.7%	6.14
Asian American	2,574	5.6%	\$2,863,113	1.5%	3.73
Native Hawaiian & Other Pacific Islanders	27	0.06%	\$7,282	0.004%	15.0
Hispanic American	5,529	12.1%	\$6,150,323	3.3%	3.67
Unclassifiable by sector, race, gender, ethnicity	2,099	4.6%	\$98,623,446	52.9%	.087

Source: US Census Bureau 2023 Annual Business Survey.

Minority- and Women-owned firms and revenue shares relative to the entire market are likely partially informative of the existence of Minority- and Women-owned firm and revenue disparities. The ratio of Minority- and Women-owned firm share to revenue share may be more informative of disparities.¹⁴⁵ For example, in the case of firms owned by African Americans, this ratio is $(4.3\%)/(0.7\%)$ or approximately 6.14. This suggests that the revenue share of firms owned by African Americans would have to increase by a factor of approximately 6.14 to equal its firm share parity. For firms owned by White Americans this ratio is approximately 1.90. Thus, relative to White American-owned firms, those owned by African Americans are revenue underrepresented in Palm Beach County by a factor of approximately $6.14/1.90 = 3.23$ or 323%. In general, the estimates in Table 46 suggest that all Minority- and Women-owned businesses are revenue underrepresented relative to firms owned by White Americans in Palm Beach County.

Overall, the descriptive summary in Table 46 suggests that in Palm Beach County private sector, Minority- and Women-owned businesses face barriers that translate into lower firm revenues. In general, if being a Minority- or Women-owned business in Palm Beach County private sector is associated with lower firm revenue, absolutely and relative to their firm share in the market, this lends some support to the “but-for” justification for affirmative action in public procurement. Lower revenues for Minority- and Women-owned

¹⁴⁵ This ratio can be viewed as an index of revenue underrepresentation, as it measures the distance between a firm’s representation in the market relative to its share of market revenue. A value greater than unity indicates underrepresentation, a value equal to unity indicates parity, and a value less than unity indicates overrepresentation.

businesses in Palm Beach County is suggestive of, but does not necessarily prove, the existence of private discrimination that undermines their capacity to compete with White American-owned firms for public contracting opportunities. Lower revenues driven by private sector discrimination for Minority- and Women-owned businesses could motivate and justify a private discrimination justification for Affirmative Action in Palm Beach County procurement policies; otherwise, Palm Beach County is potentially a passive participant in private discrimination against Minority- and Women-owned businesses with respect to its procurement practices.

C. Self-Employment

The Concrete Works decision which upheld an M/WBE program was based in part on evidence that “Black Americans, Hispanic Americans, and Native Americans working in Construction have lower rates of self-employment than similarly situated White Americans.”¹⁴⁶ To explicitly examine potential disparities in the rates of business ownership in Palm Beach County, G&S estimated the parameters of a Logit regression model using 2023 American Community Survey (ACS) data from the Integrated Public Use Microdata Series (IPUMS) housed at the University of Minnesota.¹⁴⁷ The ACS is a project of the U.S. Census Bureau that has replaced the decennial census as the key source of information about American population and housing characteristics. The 2023 ACS is an approximately 1-in-100 weighted public use sample consisting of U.S. households with the smallest identifiable unit being the Public Use Microdata Unit (PUMA), which is a geography containing at least 100,000 individuals. The specification of each model controls for those variables customary in the literature that are utilized to explain self-employment to estimate the effects of M/WBE status on self-employment while minimizing and/or eliminating confounding factors.¹⁴⁸ G&S determines statistical significance on the basis of the estimated coefficient’s probability value—or P-value. The P-value is the probability of obtaining an estimate of the coefficient by chance alone, assuming that the null hypothesis of the variable having a zero effect is true. As a convention, G&S rejects the null hypothesis of no effect, and concludes that the estimated coefficient is statistically significant as long as the P-value $\leq .05$, which are highlighted in bold in the tables for all parameter estimates. The G&S self-employment regression specifications capture, in a parsimonious manner, the critical determinant factors found in the literature that explain entry into self-employment that includes basic individual characteristics (gender, age, marital status, and language spoken), human capital (education), and individual financial characteristics (home ownership and income from financial assets).¹⁴⁹ In particular, G&S selected the ACS sample on the basis of the *CountyFips* variable, which uniquely identifies all counties in the United States.

¹⁴⁶ Concrete Works v. City & Cty of Denver, 321 F.3 950 (10th Cir 2003).

¹⁴⁷ ACS data are publicly available at <https://usa.ipums.org/usa/>. See: Steven Ruggles, Sarah Flood, Ronald Goeken, Josiah Grover, Erin Meyer, Jose Pacas and Matthew Sobek. *IPUMS USA: Version 10.0 [dataset]*. Minneapolis, MN: IPUMS, 2020. <https://doi.org/10.18128/Do10.V10.0>

¹⁴⁸ See: Grilo, Isabel, and Roy Thurik. 2008. "Determinants of Entrepreneurial Engagement Levels in Europe and the US." *Industrial and Corporate Change* 17: pp. 1113-1145, and Van der Sluis, Justin, Mirjam Van Praag, and Wim Vijverberg. 2008. "Education and Entrepreneurship Selection and Performance: A Review of the Empirical Literature." *Journal of economic surveys* 22: pp. 795-841.

¹⁴⁹ See: Dileo, Ivano, and Thaís García Pereiro. 2019. "Assessing the Impact of Individual and Context Factors on the Entrepreneurial Process. A Cross-country Multilevel Approach." *International Entrepreneurship and Management Journal* 15(4): pp. 1393-1441; Simoes, Nadia, Nuno Crespo, and Sandrina B. Moreira. 2016. "Individual Determinants of Self-employment Entry: What Do We Really Know?" *Journal of Economic Surveys*, 30(4): pp. 783-806.

In the G&S Logit regression model of self-employment, the estimated parameters are odds ratios, and when greater (or less) than unity indicate that having a particular characteristics increases (or decreases) the likelihood of being self-employed. In the case of the Minority or White Women status indicators, the excluded category is White Males, and a positive (or negative) odds ratio indicates that relative to White Males, having that Minority or White Women characteristic increases (or decreases) the likelihood of being self-employed in Palm Beach County. The M/WBE and race/ethnicity/gender status indicators are of primary interest, as they inform the extent to which such status is a driver of disparities in outcomes. The other covariates serve as ACS available controls and/or proxies to finance self-employment ventures.

Table 47 reports Logit odds ratio parameter estimates across all business sectors in Palm Beach County. Relative to White Americans Males - Women, African Americans, and Hispanic Americans are less likely to be self-employed, as the estimated odds ratio is less than unity and statistically significant in these instances.¹⁵⁰ This is suggestive of these type of firms facing barriers to self-employment in Palm Beach County. The lower self-employment likelihood of these type of Minority- and Women-owned businesses could reflect disparities in public contracting as Chatterji, Chay, and Fairlie (2014) find that the self-employment rate of African Americans is increasing with respect to the provisioning and establishment of M/WBE public procurement programs.¹⁵¹

Table 47: Self-Employment/Business Ownership
Palm Beach County FL:
Logit Parameter Odds Ratio Estimates from the 2023 American Community Survey
Palm Beach County 2025 Disparity Study

	Coefficient	P-value
<i>Regressand: Self-Employed: Binary</i>		
Age	1.0225	0.0722
Age Squared	1.0000	0.8459
Respondent is Married: Binary	1.0900	0.2438
Respondent is Female: Binary	0.7162	0.0000
Respondent is Non-Hispanic Black: Binary	0.3559	0.0000
Respondent is Non-White Hispanic: Binary	0.7342	0.0278
Respondent is Native American: Binary	0.6039	0.1907
Respondent is a Pacific Islander: Binary	0.0001	0.9785
Respondent is Asian American: Binary	0.7433	0.1034
Respondent is Other Race: Binary	0.9102	0.4854
Respondent is veteran: Binary	0.9033	0.5151
Respondent has a 4-year degree: Binary	0.9006	0.1519
Respondent speaks only English: Binary	0.6940	0.0001
Respondent is Disabled: Binary	0.6528	0.1118
Respondent is Same-sex Married: Binary	0.8279	0.6110
Value of Home	1.0024	0.0000
Interest, Dividend, and Rental Income	1.0018	0.0043
Mortgage Payment	1.0031	0.4626
Number of Observations	6,313	
Pseudo R ²	0.0536	

Source of Data: American Community Survey 2023, IPUMs USA

¹⁵⁰ All Self-employment regressions use heteroskedasticity robust county-clustered standards errors to mitigate bias due to unobserved factors that explain self-employment.

¹⁵¹ Chatterji, Aaron K., Kenneth Y. Chay, and Robert W. Fairlie. 2014. "The Impact of City Contracting Set-asides on Black Self-employment and Employment." *Journal of Labor Economics* 32: pp. 507-561.

Table 48 reports Logit odd ratio parameter estimates for the Construction sector in Palm Beach County—an important sector in the market for public procurement. The estimated odds ratios less than unity with statistical significance suggest that relative to White Male-owned firms, Women, African Americans, and Hispanic Americans less likely to be self-employed in the Palm Beach County Construction sector. This is suggestive of these type of firms facing barriers to self-employment in the Construction sector. The lower likelihood of these type of Minority- and Women-owned businesses being self-employed could reflect disparities in public contracting, as Marion (2009) finds that the self-employment rate of African Americans in construction is increasing with respect to the provisioning and establishment of M/WBE public construction procurement programs.¹⁵²

Table 48: Construction Sector Self-Employment/Business Ownership
Palm Beach County FL:
Logit Parameter Odds Ratio Estimates from the 2023 American Community Survey
Palm Beach County 2025 Disparity Study

	Coefficient	P-value
<i>Regressand: Self-Employed In Construction Industry: Binary</i>		
Age	1.1982	0.0000
Age Squared	0.9982	0.0000
Respondent is Married: Binary	0.9892	0.9609
Respondent is Female: Binary	0.1451	0.0000
Respondent is Non-Hispanic Black: Binary	0.3908	0.0342
Respondent is Non-White Hispanic: Binary	0.3293	0.0050
Respondent is Native American: Binary	0.0021	0.9969
Respondent is a Pacific Islander: Binary	0.0013	0.8953
Respondent is Asian American: Binary	0.1523	0.0659
Respondent is Other Race: Binary	1.9334	0.0683
Respondent is veteran: Binary	0.9663	0.9334
Respondent has a 4-year degree: Binary	0.3322	0.0002
Respondent speaks only English: Binary	0.4993	0.0074
Respondent is Disabled: Binary	0.0000	0.9890
Respondent is Same-Sex Married: Binary	1.0106	0.9918
Value of Home	1.0142	0.1208
Interest, Dividend, and Rental Income	1.0011	0.9787
Mortgage Payment	1.0001	0.2653
Number of Observations	9,760	
Pseudo R ²	0.1305	

Source of Data: American Community Survey 2023, IPUMs USA

D. Building Permit Analysis

To enable a broad analysis of the extent of M/WBE participation in Palm Beach County, Table 49 reports on the distribution of building permits by identifiable firm type—by individual and classification type respectively—issued between January 1, 2019 and December 31, 2023. While building permits are directly related to the Construction industry, Construction activities are a vital component of an economy and engender spending on other economic activities. As such, an analysis of the distribution of building permits

¹⁵² Marion, Justin. 2009. "Firm Racial Segregation and Affirmative Action in the Highway Construction Industry." *Small Business Economics* 33: Article 441.

by firm type can inform the extent of Minority- and White Women-owned businesses participation in the overall market economy of Palm Beach County.

The analysis of commercial building permits in Palm Beach County linked rosters of identified M/WBE firms to submitted building permits. As interest is in the share of distinct permittees—to capture the participation of distinct and unique firm types in Palm Beach County—G&S only counts a firm once if it was awarded more than one building permit. This resulted in 5,200 distinct permittees.

The distribution of commercial building permits reported in Table 49 reveal that the total number of building permits going to any of the firm types that could be classified as M/WBE was 108, which constituted approximately 2.08% of all commercial building permits issued. Firms classified as Hispanic American-owned were issued approximately 1.08% of building permits, African American-owned were issued approximately 0.86% of building permits, Asian American-owned were issued approximately 0.13% of building permits, and the lowest number of building permits (that is, 0) were issued to firms owned by Native Americans. For WBEs, the number of building permits issued was 27, which constituted approximately 0.52% of all commercial building permits issued.

Table 49: Distribution of Building Permits by Individual Firm Type
Palm Beach County, FL.
January 1, 2019 – December 31, 2023
Palm Beach County 2025 Disparity Study

Business Ownership Classification	Number of Building Permits	Percentage of Building Permits ^a
Asian American	7	0.13%
African American	45	0.86%
Hispanic American	56	1.08%
Native American	0	0.00%
TOTAL MINORITY	108	2.08%
Woman	27	0.52%
TOTAL M/WBE	135	2.59%
Total White American Male	5065	97.41%
TOTAL	5200	100.00%

Griffin & Strong, 2025

Notes: ^aRounded to nearest thousandth

The estimated low commercial building permit shares for M/WBEs in Palm Beach County is suggestive of private sector barriers that constrain the ability of these types of firms to participate in the industry as prime contractors. G&S estimates suggest that Non-M/WBEs accounted for approximately 97% of building permits in Palm Beach County. To the extent that experience acquired by participating in the private sector economy translates into an enhanced capacity to compete in the market for public sector contracts and subcontracts, the almost complete dominance of Non-M/WBEs in securing building permits suggest the presence of private sector barriers faced by M/WBEs. In this context, if there are any public contracting/subcontracting disparities between Minority- and White Women-owned businesses and Non-

minority firms in Palm Beach County, it could constitute passive discrimination against Minority and White Women-owned businesses as the disparities could reflect barriers, possibly discriminatory, that Minority and White Women-owned businesses face in the private sector which serve to undermine their capacity to compete successfully for contracts and subcontracts.

E. Bank Loan Denials

To the extent that M/WBEs (certified Minority and White Women-owned businesses) are credit-constrained as a result of facing discrimination in private lending markets, their capacity to compete for and execute public projects could be compromised. In this context, a political jurisdiction that awards public contracts is potentially a passive participant in discrimination as Minority and White Women-owned businesses may only have recourse to higher cost financing due to facing discrimination in private credit markets, which compromises the competitiveness of their bids. Such a perspective on discrimination suggests that barriers faced by Minority and White Women-owned businesses in the private sector credit markets can rationalize targeted public contracting programs by political jurisdictions, and the capacity and growth of Minority and White Women-owned businesses could be enhanced with access to public contracting opportunities (Bates, 2009).¹⁵³

Tables 50 and 51 report, for each of the distinct M/WBEs and owner self-reported race/ethnicity/gender ownership characteristics in the G&S sample, the estimated parameters of Fixed Effect Ordinary Least Squares regression. The dependent variable is the standardized linear prediction of being denied for a commercial bank loan, which is estimated from an ordinal logit regression model.¹⁵⁴

The estimated linear prediction captures how the outcome of interest is determined by presumably “race-neutral” factors determining a firm’s capacity to do business in the marketplace and with Palm Beach County. The regressors in the logit specification capturing firm capacity include: (1) Firm owner has more than 20 years experience, (2) firm has more than 10 employees, (3) firm owner has a baccalaureate degree, (4) firm gross revenue is more than 1.5 million dollars, (5) firm bonding limit is more than 1.5 million dollars, (6) whether or not financing is a barrier to securing public contracts, (7) whether or not the firm is in the construction sector, (8) whether or not the firm is registered to do business with Palm Beach County, (9) whether or not the firm is a willing/able prime contractor for Palm Beach County, and (10) whether or not the firm is a willing/able subcontractor for Palm Beach County.

The estimated coefficients in Table 50 reveal that for the eight distinct broadly classified M/WBEs in the G&S sample, relative to Non-M/WBEs—the excluded group in the Categorical Regression Model (CRM)

¹⁵³ See: Bates, Timothy. 2009 "Utilizing Affirmative Action in Public Sector Procurement as a Local Economic Development Strategy." *Economic Development Quarterly*, 23: pp. 180 - 192., Bates, Timothy, and Alicia Robb. 2013. "Greater Access to Capital is Needed to Unleash the Local Economic Development Potential of Minority owned Businesses." *Economic Development Quarterly*, 27: pp.250 - 259., and Shelton, Lois M., and Maria Minniti. 2018. "Enhancing product market access: Minority Entrepreneurship, Status Leveraging, and Preferential Procurement Programs." *Small Business Economics*, 50: pp. 481-498.

¹⁵⁴ See Appendix K for a detailed discussion of this regression methodology. The P-values are based upon heteroskedasticity-robust standard errors.

specification—certified Minority-owned firms are more likely to be denied commercial bank loans.¹⁵⁵ When disaggregated by the race/ethnicity/gender of owners, the results in Table 51 suggest that relative to Non-minority firms, firms owned by African Americans and Hispanic Americans are more likely to have been denied commercial bank loans. This suggests that in Palm Beach County, any public procurement disparities between Non-minorities and African American and Hispanic American-owned businesses in Palm Beach County, FL, cannot be explained, at least in part, by differential access to private credit (e.g., race-based credit market discrimination) that enables financing a capacity for success in public procurement.

**Table 50: Fixed Effects Regression Parameter Estimates-Bank Loan Denials:
Firm Certification Type and Commercial Bank Loan Denial Probabilities
In Palm Beach County, FL
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized Linear Prediction of Commercial Bank Loan Denial		
Firm is a Certified Minority business enterprise: (Binary)	0.3388	0.0163
Firm is a Certified woman enterprise: (Binary)	0.0793	0.0878
Firm is a Certified small business enterprise: (Binary)	-0.0226	0.0894
Constant	-0.0223	0.0677
Number of Observations	188	
R^2	0.0661	

Griffin & Strong, 2025

**Table 51: Fixed Effects Regression Parameter Estimates-Bank Loan Denials:
Firm Ownership Type and Commercial Bank Loan Denial Probabilities
In Palm Beach County, FL.
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Linear Prediction of Commercial Bank Loan Denial		
Firm is African American-owned: (Binary)	0.6520	0.0100
Firm is Hispanic American-owned: (Binary)	0.5486	0.0031
Firm is Asian American-owned: (Binary)	0.0093	0.4076
Firm is Bi/Multiracial-owned: (Binary)	0.3714	0.3871
Firm is other race-owned: (Binary)	0.2562	0.0943
Firm is Woman-owned: (Binary)	-0.1042	0.4578
Constant	-0.2325	0.0397
Number of Observations	368	
R^2	0.1199	

Griffin & Strong, 2025

¹⁵⁵ As the covariates measuring public contracting activity, outcomes, and and other respondent characteristics are categorical responses to questionnaire items (e.g., public contracting bid ranges, yes, no), a CRM specifies the categories as latent variables with likelihood thresholds that are conditioned on other conditioning covariates.

F. Conclusion

A descriptive and inferential private sector analysis of Palm Beach County revealed that in general, being a Minority or White Women-owned business in Palm Beach County is associated with lower firm revenue, and overall revenue underrepresentation, relative to Non-minority firms. Lower revenues for Minority and White Women-owned businesses in Palm Beach County are suggestive of private sector discrimination that undermines their capacity to enter the market and compete with White Male-owned firms for public contracting and subcontracting opportunities.

For White Women, African Americans, and Hispanic Americans, overall self-employment likelihoods are lower. In the construction sector, a major venue for public procurement, White Women, African Americans, and Hispanic Americans, are relatively less likely to be self-employed, and White Male-owned firms accounted for approximately 97% percent of construction building permits. This lends some support to the “but-for” justification for affirmative action in public procurement—a policy intervention which can increase the self-employment outcomes of Minority and White Women-owned businesses. Relative to firms owned by White Males, firms owned by African Americans, Hispanic Americans, and those certified as MBEs were less likely to have commercial bank loan denials. This suggests that credit market discrimination, resulting in either no access to financing, or access to only high cost financing, may not have a role in reducing the relative capacity of Minority and White Women-owned businesses to compete for public procurement, and cannot, explain disparities in Palm Beach County contracting outcomes between Minority and White Women-owned businesses and White Male-owned firms.

In other relevant outcomes, regression results reported in Appendix K provide more findings on which particular Minority and White Women-owned businesses in Palm Beach County are potentially constrained by barriers that could translate into lower likelihoods of winning prime contracts and subcontracts. Firms owned by African Americans, Hispanic Americans, and Asian Americans are more likely to agree that informal public contracting networks have constrained their success in winning prime awards from Palm Beach County. This finding is underscored by the finding that relative to White Male-owned firms, firms owned by Women were more likely to have never been awarded a prime or subcontract from Palm Beach County. Firms owned by Women, African Americans, and Other Race Americans were also relatively more likely to have never had a Palm Beach County subcontract.

VII. ANECDOTAL EVIDENCE

A. Introduction

Anecdotal evidence offers analysis of the perspectives and experiences of business owners, community organizations, and other stakeholders from across the Palm Beach County marketplace in regard to doing business or attempting to do business with Palm Beach County Government (“the County”).¹⁵⁶ Griffin & Strong (“G&S”) utilized a variety of qualitative evidence gathering methodologies while reaching out to as many business owners and other community members as possible to ensure that consistent responses, views, and themes identified by business owners and organizations in the Palm Beach County area could be recorded throughout the qualitative data collection period. G&S reached out to firms to participate regardless of their Small, Minority, Women-owned Business Enterprise (“S/M/WBE”) status to establish an inclusive representation of the Palm Beach County marketplace. It is important to note, however, that feedback from these engagements and responses from Study participants is not intended to represent every single member of the community, but instead authentically reflects a variety of individual perspectives about the County’s procurement processes and contracting.

G&S began the qualitative data collection process with four (4) informational meetings (two virtual, two in-person) to educate and inform community members of the purpose, methods, and goals of the disparity study. G&S conducted outreach to 15,426 firms and 130 local organizations to promote this meeting. With 247 registrants, the informational meetings were held on October 15 and 17, 2024, and attended by a total of 98 participants. The following sections in this chapter outline the feedback gathered via 52 one-on-one anecdotal interviews selected from a random sample, two (2) one-on-one non-random business interviews, four (4) public input sessions, two (2) focus groups using a random sample of firms, three (3) interviews with local organizations, and the online Survey of Business Owners.

B. Methods

The G&S Study team did not seek to verify, disprove, or correct insights shared by participants in anecdotal data collection to honor the integrity of the information gathered. Therefore, there may be conclusions included which are not reflective of written policy and procedures, but those conclusions are included to provide readers with as much information as possible about the community’s perceptions and experiences doing or attempting to do business with the County. Where there is conflict between the community’s perception and the County’s policies, it can serve to highlight areas where communication between Palm Beach County and the public regarding policy and procedure can be bolstered or improved.

1. Anecdotal Interviews

The Study team conducted 52 one-on-one interviews with business owners in the Miami-Fort Lauderdale-West Palm Beach Metropolitan Statistical Area (“MSA”), randomly selected from a database of available

¹⁵⁶ The term “marketplace” is used when referring to the totality of anecdotal evidence that was collected throughout Palm Beach County and the Miami-Fort Lauderdale-West Palm Beach MSA. This term is also used when anecdotal comments made by a respondent are not specific about what geographic location in/around Palm Beach County they are referring to.

firms in the MSA. The interviews were conducted virtually. Firms interviewed varied demographically, including eight (8) Asian American-owned firms, two (2) Native American-owned firms, twelve (12) Hispanic American-owned firms, thirteen (13) African American-owned firms, eleven (11) White Women-owned firms, and six (6) White Male-owned firms. Firms interviewed span across a variety of fields including architecture, construction, engineering, consulting, technology, food service, professional services, and non-professional services. It should also be noted that a portion of interviewees self-identified as small businesses, alongside participants who were certified as Small Business Enterprises (“SBE”) by the County. The themes identified in the sections below highlight perspectives that were expressed by participating firms and organizations in relation to doing business, attempting to do business with the County, or if they have not attempted to do business with the County, why not. The identity of anecdotal interviewees will be coded as AI.

2. Organizational Meetings

G&S met with three (3) local community and business organizations out of the 130 organizations that the Study team reached out to over the course of the Study. All meetings were hosted virtually. Organizational meetings were conducted in an effort to better understand the perspectives, experiences, and expectations of communities represented by these organizations. Each meeting offered unique insights into the needs of the business community and members of each organization. Organizations praised the County for the work it is currently doing to support and engage small, Minority-owned businesses, while articulating that more can be done. They also identified current shortcomings in relation to outreach, access, and bidding. Organization leaders also provided suggestions on actions that the County could take to better support business owners. The identity of organizational interviewees will be coded as OI.

3. Business Interviews

G&S met with two (2) local businesses that requested interviews (and were non-random) in an effort to better understand the perspectives, experiences, and expectations of local businesses in the area. All meetings were hosted virtually. Each of the meetings offered unique insights into the needs of small and Minority business owners in Palm Beach County. The identity of business interviewees will be coded as BI.

4. Public Input Sessions

G&S held a total of four (4) public input sessions on February 11, 2025, and February 13, 2025. There was a total of 147 registrants for the four meetings, and 57 participants in total attended the sessions. Three (3) of the public meetings were conducted virtually and one (1) was conducted in person. The public meetings were publicized through broad use of social media advertisements, press releases to area news outlets, flyer postings, outreach to 130 organizations, email blasts to 14,443 business owners, and an announcement on the Study website. Transcripts with the stated names of all participants were produced after each meeting. At each meeting, a member of the Study Team at G&S introduced the Study and the purpose of the meeting to participants. Following the introduction, G&S heard from businesses who shared their experiences, both positive and areas of concern, doing business or attempting to do business with the County or within the MSA. Participants also provided recommendations for the County on how to best improve issues and inequities whether experienced from the County, within the MSA, or from prime contractors which they highlighted in the public meetings. The identity of public input session participants will be coded as PI.

5. Focus Groups

G&S held two (2) focus groups on February 26, 2025, and February 27, 2025. A total of 377 firms were contacted to participate in the sessions. Of those firms, 41 confirmed their interest in participating, 27 firms registered for the sessions, and between the two sessions a total of 15 firms attended and participated. Participants were selected from a random sample of businesses in the MSA, filtering for firms who had not already participated in an anecdotal interview. The focus groups were conducted virtually. Focus Groups provided business owners with the opportunity to engage in conversation and share feedback semi-anonymously. The identity of focus group participants will be coded as FG.

6. Online Survey of Business Owners

In addition to strictly qualitative data collection methods, G&S conducted an online Survey of Business Owners. The Survey was sent out via email blasts to 14,940 business owners, promoted by local organizations, and promoted at public meetings for the disparity study, ultimately garnering participation from 368 business owners throughout Palm Beach County. Survey findings reflected and confirmed perspectives that were previously identified by interviews, focus groups, and public meetings. Business owners in Palm Beach County area expressed their concerns with informal networks, lengthy and difficult bidding and certification processes, inauthentic good faith efforts from prime contractors, discrimination, difficulties faced by small businesses, lack of access to information and capital, issues with prompt pay, as well as lack of effective communication and outreach from the County and a perceived limiting marketplace. In the Survey tables throughout this chapter, “Not selected” means the respondent did not select that response option as applicable to them/their experiences while “Selected” means that the respondent did select that response as applicable to them/their experiences. The full survey results are available for review in Appendix L of this Study.

7. Email Comments

Businesses in the Palm Beach County Area were encouraged to submit email comments to palmbeachcountystudy@gspclaw.com over the course of the data collection period. Opportunity to submit these comments allowed business owners who were not selected for other data gathering methods to contribute their perspectives and experiences. There were no email comments submitted as evidence for this Study.

C. Key Themes from Anecdotal Evidence Analysis

Key Themes from Anecdotal Evidence Analysis	
1	Communication & Outreach
2	Bidding Process
3	Certification
4	Accounts of Discrimination
5	Informal Network
6	Difficulties for Small Businesses
7	Prime Contractors & "Good Faith Efforts"
8	Lack of Information and Access to Capital
9	Insurance, Bonding, and Credit
10	Prompt Pay
11	Limited Perceived Opportunities

1. Communication & Outreach

Lack of communication, engagement, and outreach from Palm Beach County were identified as a primary concern by participants across data collection methods. Firms stated that these deficiencies left new, small, Minority, Women, and White Male-owned firms struggling to break into the marketplace and discouraged some firms from attempting to do business with the County at all despite being local. AI-19, an Asian American-owned tech firm, referred to the Palm Beach County marketplace as growing and expansive, but cited a need for more communication from the County in regard to opportunities. Participants generally expressed a desire to work with the County but struggle to do so as a result of poor communication. AI-43, a Hispanic American-owned marketing firm noted that "geography and the lack of visibility into opportunities have kept us from engaging more with Palm Beach County, but it seems like a great market." AI-26, an African American-owned firm providing janitorial services, shared a similar perspective, articulating that a lack of accessible, centralized resources makes navigating the marketplace difficult.

AI-3, an African American-owned food service firm, shared that while they were initially somewhat successful breaking into the marketplace, poor communication and lack of responsiveness from County staff left them struggling. They also expressed concern with a lack of outreach from the County regarding opportunities for small firms, feeling that opportunities were likely missed because information is not shared or made accessible in a timely manner. AI-15, a White Male-owned firm, agreed, sharing that they had yet to work with the County due to limited communication and responsiveness when seeking information. Lack of outreach was also identified as an issue by AI-48, a White Woman-owned consulting firm, stating, "I've lived in Palm Beach County for years, but I've never worked with the county or local businesses—it's like the resources aren't there." AI-4, an African American-owned healthcare firm, shared

a slightly different perspective, saying, "There's a lot of assistance and free programs here, but you have to be willing to do a lot of work. It's overwhelming when you're learning everything on your own." They argued that while resources for Minority-owned firms are there, they are often superficial and lack adequate support on the part of the County.

Outreach from the County to new, small, and Minority-owned firms who register to do business with them appears to be inconsistent, leaving firms unsure of the value of programs like registration or certification, and ultimately making it more difficult to break into the marketplace.

According to the Study's Survey of Business Owners (Appendix L: Survey of Business Owners: Table 91), when asked if they felt that Palm Beach County provides adequate outreach and supportive services to businesses interested in contracting with the County, 24.4% of participants selected agree or strongly agree, 50.5% selected neither agree nor disagree, and 25% of participants selected disagree or strongly disagree. It should be noted that 32.8% of Hispanic American-owned firms, 23.7% of African American-owned firms, and 29.7% of Women-owned businesses either disagreed or strongly disagreed that Palm Beach County provides adequate outreach and support as compared to 12.3% of White Male-owned firms.

Table 91. Palm Beach County provides adequate outreach and supportive services to businesses interested in contracting with the County.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	7	1	1	6	1	0	10	5	31
	6.1 %	8.3 %	11.1 %	9.8 %	20 %	0 %	15.4 %	5 %	8.4 %
Agree	27	0	1	7	0	1	14	9	59
	23.7 %	0 %	11.1 %	11.5 %	0 %	100 %	21.5 %	8.9 %	16 %
Neither Agree or Disagree	53	9	5	28	1	0	33	57	186
	46.5 %	75 %	55.6 %	45.9 %	20 %	0 %	50.8 %	56.4 %	50.5 %
Disagree	17	1	1	15	0	0	3	20	57
	14.9 %	8.3 %	11.1 %	24.6 %	0 %	0 %	4.6 %	19.8 %	15.5 %
Strongly Disagree	10	1	1	5	3	0	5	10	35
	8.8 %	8.3 %	11.1 %	8.2 %	60 %	0 %	7.7 %	9.9 %	9.5 %
Total	114	12	9	61	5	1	65	101	368

Communication and outreach in relation to registration was also a point of contention for some firms, with some claiming that a lack of outreach has left them unaware of registration opportunities and others unsure of how to engage with the County or the current opportunities accessible to business owners. Table 17 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners indicates 39.5% of firms are not registered to do business with the County because they are unaware there was a registry.

Table 17. Did not know there was a registry.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	5	0	1	5	1	0	1	10	23
	83.3 %	0 %	100 %	83.3 %	50 %	0 %	20 %	55.6 %	60.5 %
Selected	1	0	0	1	1	0	4	8	15
	16.7 %	0 %	0 %	16.7 %	50 %	0 %	80 %	44.4 %	39.5 %
Total	6	0	1	6	2	0	5	18	38

Additionally, Table 16 (Appendix L: Survey of Business Owners) indicates that 28.9% of firms reported that they were not registered to do business with the County because they did not know how to register.

Table 16. Do not know how to register.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	2	0	1	4	1	0	3	16	27
	33.3 %	0 %	100 %	66.7 %	50 %	0 %	60 %	88.9 %	71.1 %
Selected	4	0	0	2	1	0	2	2	11
	66.7 %	0 %	0 %	33.3 %	50 %	0 %	40 %	11.1 %	28.9 %
Total	6	0	1	6	2	0	5	18	38

Lack of follow-up after initial contact from the County was also identified as a frustration by several firms. AI-2, an Asian American-owned consulting firm, expressed concern with lack of follow up from the County following networking and outreach events, stating that "you email them, and you never ever hear anything. It's not even like, 'Let me redirect you to someone who can help,' you just don't hear anything. So, you don't even know if your email went into the abyss." These breakdowns in communications can often leave small businesses like theirs without clear pathways to get information. AI-13, an African American-owned firm, has had a similar experience, noting that breakdowns in communication and lack of follow through from County staff has acted as a direct barrier to them obtaining certification and participating in County programs, saying, "They didn't follow through with communication during my certification process, which created unnecessary barriers." FG-3 also shared that communication from County employees was poor when they attempted to secure MBE certification, noting that they did not receive response to any of their queries.

While Table 91 above shows that 50.5% of respondents selected neither agree nor disagree and 25% of participants selected disagree or strongly disagree, it should be noted that a minority of participants across other data collection methods disagreed with these sentiments, sharing their positive experiences with the County in reference to communication and outreach. OI-1 noted that the County is making a concerted effort to engage small and Minority-owned businesses and support them with registration and compliance. They feel that outreach is accessible, and that County staff are easy to contact if firms run into issues. OI-2 shared a similar perspective, stating that the County has been "out in the community a lot more," making themselves accessible for conversation at other events as well. FG-13 agreed, claiming that there are a lot of networking events, MBE events, events with contractors, and that "PBC is flooding their emails."

AI-7, a White Male-owned construction firm, felt that the marketplace was competitive but accessible with plentiful opportunities for firms, noting that their firm has maintained a steady and communicative relationship with the County over the years. AI-12, a White Male-owned firm, also shared that they have had a largely positive experience working with the County in reference to communication with County staff and opportunities, stating, "It's been very successful for me... I've had good working relationships with different departments."

Despite primarily sharing concerns about the County's current communication and outreach strategies, many firms were eager to provide recommendations to make the process better so that they could begin doing business with the County. Both AI-1 and AI-20 suggested that more targeted outreach and community engagement (i.e. resource fairs) from the County are crucial to the growth of small and Minority-owned businesses in the area. AI-8, an African American-owned firm specializing in HVAC, agreed, emphasizing the importance of proactive outreach to small firms in the County's contracting programs. They cited Broward County as a reference for effective communication, arguing that their active communication with businesses leave firms feeling more included than they do in Palm Beach County, where communication is one-sided with little to no response from the County. Several firms cited the practices of other counties when identifying solutions to the County's shortcomings. AI-17, a Hispanic American-owned firm, is registered to do business with the County, and identified a lack of communication and outreach from Palm Beach County in regard to opportunities in comparison to neighboring counties. AI-24, a Hispanic American-owned construction firm, shared a similar sentiment, suggesting using platforms like GoSpend (employed by Miami Dade County) to communicate opportunities to businesses in the area. AI-37, a Hispanic American-owned firm, also preferred Miami Dade County's practices, noting

that "Miami sends out flyers for projects that need SBE contractors... Palm Beach [County] could do the same."

AI-29, an Asian American-owned consulting firm, shared that "Palm Beach County has potential, but without a direct point of contact or clear outreach, it's challenging to connect with opportunities here." The lack of direct and intentional outreach from the County leaves many small and Minority-owned firms feeling isolated. Participants across anecdotal data collection methods expressed an overwhelming interest in engaging more with the County, and believe that more robust communication, outreach, and resources would support them in doing so.

2. Bidding Process and Excessive Paperwork

The bidding process in Palm Beach County was identified as frustrating by firms operating in the area, with complaints citing lengthy, paperwork-heavy processes, lack of transparency, and little to no feedback regarding failed bids. These difficulties have led some firms to believe that small firms and firms that are new to Palm Beach County cannot currently engage with the County's bidding process effectively.

When discussing procurement and bidding, AI-16, a White Woman-owned architecture firm, noted that the procurement process more generally was complex and required more transparency than the County currently offers. AI-1, a small, African American-owned firm shared a similar experience, stating that they did not attempt to engage with the bidding process for government contracts in Palm Beach County, feeling that the process was too complex and time-consuming for small businesses without effective communication guaranteed in return. Similarly, AI-20, a Native American-owned entertainment firm, made a singular bid attempt in the past, but has halted efforts due to a lack of information and clarity regarding the bidding process. PI-26 noted that language used in RFPs regarding minimum qualifications is "discouraging and disqualifying," with the firm articulating that it felt like the County prefers to work with larger, established firms. The firm stated that the harmful language has left them unwilling to waste their time and effort on County contracts.

Lack of knowledge surrounding bidding systems and processes and a lack of support/resources from the County when attempting to learn to navigate them discourages interested new, small, and Minority firms from engaging with the County. AI-23, an African American-owned consulting firm in healthcare, found that navigating bidding systems, which use complex language and multiple portals, to be overwhelming, stating that "it's overwhelming when you don't know where to start or which system to use. An orientation or guide would make a huge difference." AI-9, an Asian American-owned PR firm/content studio, shared that even with guidance and support from mentors, they still found the language and requirements surrounding the bidding process to be unclear. AI-11, an African American-owned catering firm, expressed interest in the bidding process, but was unclear on how to navigate it as a subcontractor, stating, "I've heard about bids and subcontracting, but I don't know how to get there or what paperwork to fill out."

According to the Study's Survey of Business Owners (Appendix L: Survey of Business Owners: Table 90), 20.9% of participants disagreed or strongly disagreed, 57.3% of participants neither agreed or disagreed, and 21.7% of participants agreed or strongly agreed when asked if they feel that there is full transparency of Palm Beach County's procurement process and its sharing of information.

Table 90. There is full transparency of Palm Beach County's procurement processes and its sharing of information.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	7	1	1	3	1	0	7	4	24
	6.1 %	8.3 %	11.1 %	4.9 %	20 %	0 %	10.8 %	4 %	6.5 %
Agree	24	1	1	8	0	0	8	14	56
	21.1 %	8.3 %	11.1 %	13.1 %	0 %	0 %	12.3 %	13.9 %	15.2 %
Neither Agree or Disagree	58	9	5	35	3	1	40	60	211
	50.9 %	75 %	55.6 %	57.4 %	60 %	100 %	61.5 %	59.4 %	57.3 %
Disagree	12	0	1	10	1	0	6	16	46
	10.5 %	0 %	11.1 %	16.4 %	20 %	0 %	9.2 %	15.8 %	12.5 %
Strongly Disagree	13	1	1	5	0	0	4	7	31
	11.4 %	8.3 %	11.1 %	8.2 %	0 %	0 %	6.2 %	6.9 %	8.4 %
Total	114	12	9	61	5	1	65	101	368

Point vs. Merit Based System: Outgrowing the SBE program

SP-1 is a local firm that has provided engineering and design services to Palm Beach County for over thirty (30) years. In that time, they have claimed to maintain and enjoy a long-standing professional relationship with departments across the County, including CID and OEBO. They were previously an SBE entity but eventually graduated from the program and expressed that they have a great deal of respect for the department and its goals, fully understanding its vision to support small businesses and Minorities to the best of its ability.

Recently, the firm has been informed by multiple clients (primarily architects) pursuing RFP procured projects that they have or will be removing their firm from their list of proposed design teams due to point criteria currently established in RFP solicitations. Their clients emphasized that they did not take issue with experience, quality of documents/work, or past performance.

According to clients and SP-1, the selection process and criteria for the specific category they bid in is a total of fifteen (15) points, with no threshold or goal specific percentage. Instead, it is their understanding that the maximum of fifteen (15) points is awarded to the firm that employs the maximum percentage of African American owned firms as subcontractors.

SP-1 shared their concerns with this points system, arguing that they feel it leads to the exclusion of local S/M/WBEs, as they are no longer relevant to firms looking to maximize their point totals. They also noted that from their perspective, it appears that local African American-owned firms are “maxed out” and that prime contractors are now placing out-of-town African American owned firms on design teams to win projects.

The firm expressed frustration with the fact that their firm “has African American employees which exceed the percentage of African American [people] that enter the engineering / architecture job sectors as defined by the US Labor and Statistics data indicating 6% participation, but that is not considered in the RFP criteria/points system.”

The firm feels that pairing a merit-based system (based on performance, experience, responsiveness, etc.) with S/M/WBE consideration percentages would provide a more level playing field for design professionals competing for work in Palm Beach.

The frustrations of the above firm and their loss of business due to a points system that they perceive to be unfair, paired with the reality of underutilization faced by African American-owned firms in Palm Beach County, indicate a need for the County to be more mindful in setting goals that will meaningfully support and engage S/M/WBE firms. Ensuring that perception of the County’s goals and practices reflects reality is necessary when working to build an equitable marketplace. Small and Minority firms should feel seen and supported alongside their peers as they navigate the marketplace, with clear communication regarding why the County implements different goals and programs, and how they will benefit firms in need of support.

Table 53 (Appendix L: Survey of Business Owners), indicates that 13.3% of participants selected that limited knowledge of purchasing/contracting policies and procedures has acted as a barrier to their firm obtaining work in the County, with 86.7% of participants not selecting this as a barrier.

Table 53. Limited knowledge of purchasing/contracting policies and procedures

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	89	12	7	52	4	0	63	92	319
	78.1 %	100 %	77.8 %	85.2 %	80 %	0 %	96.9 %	91.1 %	86.7 %
Selected	25	0	2	9	1	1	2	9	49
	21.9 %	0 %	22.2 %	14.8 %	20 %	100 %	3.1 %	8.9 %	13.3 %
Total	114	12	9	61	5	1	65	101	368

Excessive paperwork in the bidding process leaves small firms in difficult situations, as they often do not have access to the time and resources needed to complete County bids. FG-12 described RFPs for the County as “extremely exhaustive” and paperwork heavy, noting that “the plethora of things that they need is just a lot and it is overwhelming.” They went on to explain that they “feel as if it is not geared towards me being a Black owner and small company [it] is more for a bigger enterprise. So, I have not tried to apply for these things because it is overwhelming.” AI-27 a White Woman-owned firm, has also previously attempted to bid on large contracts with the County, and has found the process to be difficult due to the extensive paperwork that requires time and labor they struggle to find as a small business. AI-33, an Asian American-owned engineering firm, agreed, stating, “When you’re a one-man operation, the amount of paperwork needed to submit an RFP feels overwhelming—it’s a deterrent for new businesses.” PI-42 previously worked for the County and argued that the bidding process should operate on a “sliding scale,” according to the capacity of small firms to ensure active participation and success from firms.

Table 46 shows that according to the Study's Survey of Business Owners (Appendix L: Survey of Business Owners), 19.3% of participants identified excessive paperwork as a barrier to their firm obtaining work in Palm Beach County, with 80.7% of participants not selecting this as a barrier.

Table 46. Excessive paperwork

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	91	11	6	47	2	1	54	85	297
	79.8 %	91.7 %	66.7 %	77 %	40 %	100 %	83.1 %	84.2 %	80.7 %
Selected	23	1	3	14	3	0	11	16	71
	20.2 %	8.3 %	33.3 %	23 %	60 %	0 %	16.9 %	15.8 %	19.3 %
Total	114	12	9	61	5	1	65	101	368

AI-21, a White Women-owned wholesale distributor who has yet to successfully win a bid with the County, stated, "I registered and submitted bids, but I never heard back or got any feedback—it's like working in the dark...If they don't tell you what you did wrong, how are you supposed to get better?" They pointed out that as a small firm, submitting bids already requires significant time and resources, and that lack of transparency in regard to feedback makes it impossible to improve or move forward. PI-25 was also struggling with staying afloat while bidding in Palm Beach County, sharing that they have responded to forty (40) RFPs and have yet to land a contract. They expressed that continuing to participate in bidding is expensive and time-consuming for their firm, and that they are unsure of what they are doing wrong. AI-34, a White Women-owned construction firm, shared a similar perspective, stating that "feedback is one of the biggest issues. I submit bids, but it's hard to know where I stood or what I could improve on." AI-52, a White Male-owned firm, also struggled with this, stating that "even when you submit a bid, you never hear back—there's no feedback or transparency in the process." Without adequate feedback, firms are left to repeat the strenuous bidding process consistently with little to no success or explanation as to why they were not awarded contracts; discouraging new and small firms who already struggle with the process from attempting to do business with the County. When discussing lack of feedback in the County's bidding process, PI-32 argued that the County should be responsible to make an effort and reach out to firms who are unsuccessful in their bids, providing full transparency and feedback to better support firms in working towards winning contracts. Frustration, due to a lack of consideration and feedback on bids despite being qualified to take on contracts, is exacerbated by the fact that winning bidders in Palm Beach County are often the same few firms being selected repeatedly.

Some firms have abandoned bidding on County contracts all-together as a result of long-term frustrations with the symptoms that have not been addressed. AI-19, an Asian American-owned firm, cited excessive

paperwork and the risk of losing bids over minor errors when explaining why they chose to shift from public to private sector work.

It should be noted that a small handful of firms shared positive experiences with the County's bidding process. AI-36, a Hispanic American-owned firm, praised Palm Beach County's focus on clear and fair bidding processes, noting that "Palm Beach County is less political than Miami-Dade. Here, as long as your numbers are right, you have a fair chance."

3. Certification

a) Certification Process

The County's certification process was identified as a significant issue for business owners in Palm Beach County, with the process being referred to as confusing and difficult by some firms. Participants across data collection methods, including a majority of anecdotal interviewees, also expressed uncertainty regarding the benefits of certification in the Palm Beach County marketplace.

A number of firms shared their concern with what has been described as a lengthy, paperwork heavy certification process. AI-9, an Asian American-owned firm, referred to the certification as a "wild goose chase," taking two years and ultimately being long and disorganized. AI-2, an Asian American-owned firm shared a similar concern, stating, "I have my certification with the County and with the school district because there are two different registrations, and it's cumbersome... The whole process feels like an outdated system that's not easy to maneuver."

The County's certification process, paired with rejection of certifications from other jurisdictions, was identified as a stressor by a handful of firms. Despite having successfully secured work with their certification, AI-8, an African American-owned firm, found the certification process to be riddled with administrative hurdles and expressed concern with the fact that the process was so cumbersome, particularly because the County does not accept certifications for other jurisdictions. AI-42, a Hispanic American-owned firm, also expressed frustration with the County's unwillingness to accept certifications from other jurisdictions, stating, "If Palm Beach County recognized state-level certifications, it would reduce the administrative burden for businesses like mine." AI-11 shared a similar issue with what they feel are unnecessary, duplicative processes for certification, stating, "I thought my school district certification was countywide, but I had to start the process over to get certified with OEBO."

Based on the comments below, it can be noted that the demanding certification process negatively impacts small firms the most, often not accounting for lack of access to money and manpower needed to effectively manage difficult processes. AI-48 identified that time and money are both limited resources for small firms when considering things like certification, stating, "It's hard to justify spending \$500 on certification or 12 hours on a proposal when I'm barely covering expenses." AI-39, a White Woman-owned architecture firm, similarly shared that "as a young firm, it was hard to juggle running the business and filling out all the paperwork for certification." AI-10, an African American-owned consulting firm, made a further argument that the County's certification process and requirements were complex and exhaustive, particularly posing

challenges for small businesses with limited track records to submit. Despite its difficulty, some firms did acknowledge that the certification was ultimately helpful, with AI-43 stating that "certifications help us access bids we wouldn't have known about otherwise, but the process can be time-consuming for small businesses." AI-21 similarly identified that "the certification process was tedious, but it does help—it just doesn't solve everything."

b) Perceived Impact of Certification

Many firms across various anecdotal methods expressed disappointment with their certification, feeling that it lacks practical benefits. AI-14, an African American-owned firm, noted that despite the certification process being less cumbersome in recent years, it has not benefited them as a firm, stating that they "haven't gained any monetary benefit from being certified." AI-6, a White Woman-owned firm specializing in HVAC, agreed, stating that certification did not significantly improve chances of winning contracts in Palm Beach County. AI-46, a Hispanic American-owned marketing firm, did not find certification to be beneficial, stating that "we got certified because a client asked us to—but beyond that, it hasn't brought us any new opportunities." AI-30, a White Woman-owned firm specializing in medical case management, shared a similar perspective, stating, "I have the certification, but no one has ever asked for it. I volunteer it when relevant, but it hasn't been a critical factor in my business." AI-11, AI-7, and AI-18 all echoed these sentiments, expressing varying levels of concern with going through a cumbersome certification process that ultimately has not benefited their firms. FG-1 explained that they were happy with the impact certification has had in expanding their networks and hearing about more opportunities but have yet to land any business with the County as a result. Sharing a slightly more positive perspective, AI-27, a White Woman-owned firm, noted that while their M/WBE certification in Palm Beach County has not yet yielded significant benefits in the area, they remain hopeful that they will in the future.

According to Table 75 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners, 23.9% of firms selected that they are not certified because they do not understand how certification would benefit their firm.

Table 75. I do not understand how certification can benefit my firm.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	25	4	2	26	3	0	39	38	137
	73.5 %	80 %	50 %	78.8 %	100 %	0 %	79.6 %	73.1 %	76.1 %
Selected	9	1	2	7	0	0	10	14	43
	26.5 %	20 %	50 %	21.2 %	0 %	0 %	20.4 %	26.9 %	23.9 %
Total	34	5	4	33	3	0	49	52	180

Confusion surrounding how to best utilize certification in Palm Beach County was also widely discussed amongst anecdotal participants. AI-28, an Asian American-owned firm, stated, "I have the certification, but I don't really know what to do next or how to make it lead to actual business opportunities... Certification doesn't feel like a ticket to opportunities—it's more of a checkbox with no real pathway forward." AI-4, an African American-owned firm, found the certification process to be manageable, but was unsure of how to leverage their certification, stating, "I have the certification, but now what? I didn't understand how to leverage it in my field, and there was no guidance on how to use it effectively." AI-23, AI-9, AI-25, and AI-49 all shared similar perspectives. Firms in Palm Beach County clearly identified that they are unsure of how to effectively utilize their certifications in the marketplace, and guidance and support for newly certified firms looking to leverage their certification while navigating the marketplace was largely requested. AI-29 articulated that while they did not find the certification to be excessively challenging, noting, "Certification is only the first step—you need a system that connects certified vendors to actual contracts." AI-33 had similar statements, acknowledging that certification is important, but argued that its impact will continue to be limited without the integration of a larger support system for small and Minority-owned firms. AI-52, a White Male-owned firm, echoed this sentiment, stating that "certifications are just lip service—they don't help unless the system changes to support new vendors." Certification without adequate support for small and Minority-owned firms can often slow growth for business owners in the marketplace.

Some firms have shifted exclusively into private sector work due to the perceived lack of impact certification has had on their ability to obtain work in the public sector. AI-45, a Hispanic American-owned construction firm, stated that "private companies value the certification more—they see it as a sign of credibility, but it hasn't opened doors with the County."

A small handful of firms also discussed frustration with the fact that their certification currently does not benefit them in Palm Beach County due to where they are located. AI-16 explained that while certification has been instrumental to success in other counties, they feel that benefits are limited in Palm Beach County as a result of "local preference policies." Similarly, AI-19 holds state, county, and federal certifications, and has found that while certification can be somewhat beneficial, being located outside of Palm Beach County limits their effectiveness. Some small Minority-owned firms cannot afford office space in multiple jurisdictions and feel that it is unfair that lack of access to the funds needed to do so is minimizing the effectiveness of their certification and barring them from doing business in Palm Beach County.

Many participants identified issues with the certification process and frustrations with perceived lack of benefits, a handful of firms and organizations claimed to have seen an increase in business and credibility with certification. FG-11 noted that they found the certification process easy to navigate. AI-47, a Hispanic American-owned construction firm, shared that despite it being lengthy and paperwork heavy, "Certification has been very beneficial. After we got certified, our prime gave us more work—it was worth the effort." OI-1 reported that members feel getting certified helps with securing business in Palm Beach County, but that it does require time and effort on their end. AI-36 also shared a positive perspective, stating that "certification gives you more credibility—it shows you're doing things the right way, and clients appreciate that." Similarly, FG-2 articulated that "the certification is important to identify you are a legit business and you can do the work you say you can do." AI-50, an Asian American-owned consulting firm, echoed these perspectives, having been certified with Palm Beach County, FDOT, and the state since 1997, and explaining that "certification helps level the playing field—it gives us a better chance to compete with larger firms."

4. Accounts of Discrimination

9 anecdotal interview participants shared their experiences with discrimination in the Palm Beach County marketplace. Several Minority business owners recounted experiences of perceived racism and sexism in the Palm Beach County marketplace.

AI-2 shared an experience with a covert form of discrimination as an Asian American-owned firm offering consulting services, noting a pattern in which Minority-owned firms are selected to provide entry-level training, while their White Male counterparts are hired for executive/management-level training. The firm stated that "when it comes to the executive training, they tend to go with Non-minorities. When it's something for employees, like conflict resolution, they'll use Minority trainers. But if it's for managers, you're not going to see a lot of Minority trainers."

Women-owned Firms Facing Sexism in Male Dominated Fields

Women-owned firms in the County operating primarily in Construction and Healthcare collectively identified that perception and treatment of women in male dominated industries is often discriminatory. AI-11, a Woman-owned firm, mentioned that male-dominated industries often exclude Minority women, making it challenging to build connections. AI-42 shared a similar experience, stating that "in the beginning, men wouldn't even acknowledge me in meetings. Over time, they realized the value I brought to the table." AI-35 also struggled with sexist behavior in a male dominated field, noting that "in construction, there's still a stigma against women. People wonder if we're capable, even when we have the qualifications." AI-17 explained that underestimation of capabilities, financial challenges in starting a business, and discrimination in selection processes were systemic biases, sharing a personal experience of bias when working on a project where colleagues questioned her integrity and capability to complete tasks. Perception and treatment of women in Palm Beach County's male dominated industries is actively inflicting harm on business owners in their day-to-day lives. The perception of this behavior as "normal" by Woman-owned firms operating in the County is cause for alarm, indicating a long-standing history of casual sexism inflicted by male-owned firms across industries.

AI-30 shared a similar perspective to other Women-owned firms, stating that "doctors and lawyers don't always treat us as equals, especially women, but trust and professionalism can overcome that over time." While it is not the responsibility of Minority or Women-owned firms to combat or work to challenge sexist behavior, several participants did offer similar encouragement/perspectives. AI-38 has not personally experienced gender-based discrimination in their field but acknowledged that women in construction and other male dominated fields might also encounter skepticism. They emphasized that they felt it is important to build credibility through expertise and professionalism to combat negative perception, stating that "in construction, it's all about showing your knowledge and proving you can deliver quality work."

Many Women-owned firms work to combat these stereotypes through hard work in an attempt to survive, but it is crucial that the County work to create a more equitable marketplace for Minority and Women-owned firms to avoid or combat discrimination.

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According to Table 88 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners, 34.8% of participants felt as though M/WBEs tend to be viewed by the County and/or other prime contractors/vendors as less competent than White Male-owned businesses, with 45.6% of respondents being African American, 33.7% Woman, 37.7% Hispanic American, and 41.7% Asian American.

Table 88. In general, Minority and Women-owned firms tend to be viewed by the County and/or prime contractor/vendors as less competent than Non-minority Male-owned businesses.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	25	3	0	8	2	0	3	11	52
	21.9 %	25 %	0 %	13.1 %	40 %	0 %	4.6 %	10.9 %	14.1 %
Agree	27	2	1	15	0	0	8	23	76
	23.7 %	16.7 %	11.1 %	24.6 %	0 %	0 %	12.3 %	22.8 %	20.7 %
Neither Agree or Disagree	54	5	6	33	2	1	40	62	203
	47.4 %	41.7 %	66.7 %	54.1 %	40 %	100 %	61.5 %	61.4 %	55.2 %
Disagree	6	1	2	2	0	0	7	2	20
	5.3 %	8.3 %	22.2 %	3.3 %	0 %	0 %	10.8 %	2 %	5.4 %
Strongly Disagree	2	1	0	3	1	0	7	3	17
	1.8 %	8.3 %	0 %	4.9 %	20 %	0 %	10.8 %	3 %	4.6 %
Total	114	12	9	61	5	1	65	101	368

As outlined in Table 79 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners, 19% of participants felt as though they experienced discriminatory behavior from the private sector (i.e., non-governmental entities) from January 1, 2019, through December 31, 2023.

Table 79. Do you feel as though you experienced discriminatory behavior from the private sector (i.e., non-governmental entities) from January 1, 2019, through December 31, 2023?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	43	2	0	12	2	0	2	9	70
	37.7 %	16.7 %	0 %	19.7 %	40 %	0 %	3.1 %	8.9 %	19 %
No	39	5	5	36	3	1	52	67	208
	34.2 %	41.7 %	55.6 %	59 %	60 %	100 %	80 %	66.3 %	56.5 %
Do Not Know	32	5	4	13	0	0	11	25	90
	28.1 %	41.7 %	44.4 %	21.3 %	0 %	0 %	16.9 %	24.8 %	24.5 %
Total	114	12	9	61	5	1	65	101	368

As outlined in Table 80 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners, a smaller percentage (12%) of business owners expressed that they felt they experienced discriminatory behavior from Palm Beach County government during the Study Period.

Table 80. Do you feel as though you experienced discriminatory behavior from Palm Beach County government from January 1, 2019, through December 31, 2023?									
Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	21	2	0	5	1	0	4	11	44
	18.4 %	16.7 %	0 %	8.2 %	20 %	0 %	6.2 %	10.9 %	12 %
No	61	5	5	34	3	1	51	65	225
	53.5 %	41.7 %	55.6 %	55.7 %	60 %	100 %	78.5 %	64.4 %	61.1 %
Do Not Know	32	5	4	22	1	0	10	25	99
	28.1 %	41.7 %	44.4 %	36.1 %	20 %	0 %	15.4 %	24.8 %	26.9 %
Total	114	12	9	61	5	1	65	101	368

5. Informal Network

Participants across the Study Team's various data collection methods acknowledged and discussed the presence of an informal network of contractors in Palm Beach County who have access to otherwise unreachable contacts and information regarding County projects. In Palm Beach County, this was most frequently identified by business owners as unattainable networking connections and perceived predetermination of where/to whom contracts will be awarded. PI-35 articulated that it seems like everything is already in place, with the same prime and subcontractors repeatedly being awarded contracts. Participants found the network to be unfair and discouraging, expressing dissatisfaction with the disproportionate exclusion of S/M/WBEs from opportunities in Palm Beach County as a result. FG-1 expressed concern with the County seemingly throwing money out in the form of contracts and encouraging small and Minority-owned firms to certify and register, while simultaneously gatekeeping who is awarded said contracts. FG-4 agreed, stating, "The money is there but how do we get it?" Firms left on the outside of the "gate" struggle to win any contracts, making it difficult to stay afloat.

As outlined in Table 82 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners, 54.6% of participants felt that there is an informal network of prime and sub-contractors present in Palm Beach County that monopolizes the public contracting process. The survey responses highlight a significant difference in perspective between Minority and White Male-owned firms.

Table 82. Do you believe there is an informal network (a closed group of businesses that have existing relationships with County purchasing) of prime contractors/vendors and subcontractors doing business with Palm Beach County that monopolizes the public contracting process?

Response s	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	82	6	6	33	4	1	19	50	201
	71.9 %	50 %	66.7 %	54.1 %	80 %	100 %	29.2 %	49.5 %	54.6 %
No	32	6	3	28	1	0	46	51	167
	28.1 %	50 %	33.3 %	45.9 %	20 %	0 %	70.8 %	50.5 %	45.4 %
Total	114	12	9	61	5	1	65	101	368

AI-2 explained that "I'm constantly hustling. It's hard. I still think it's who you know. You could certify, you could register, but if you don't know someone on the inside, it's really hard." The firm identified and expressed concern with what they described as the marketplace's network driven nature, emphasizing that personal connections play a larger role in securing contracts than certification/registration. AI-17 and AI-34 shared similar perspectives, respectively arguing that relationships and direct connections have been more influential in securing business for their firm, and that personal relationships ultimately outweigh any credentials a company may have. AI-52 offered further insight, asserting that "unless you have a relationship with procurement officers, nothing is going to happen—it's not about the quality of your product." PI-27 shared a similar statement that "the County commissioners are the ones who make all the decisions... You have to take the right people out to lunch and network with them." There is a perception that contracts are limited to certain companies and that opportunities are not equally available in Palm Beach County, and access to a network does not guarantee work. Success appears to be reliant on particular networks and relationships. AI-4 noted that despite the County having available resources for firms looking to break into the marketplace, the individuals, firms, and organizations present in networking circles provided for small and Minority-owned firms "were helpful, but many weren't invested in helping me get to the next level." The firm identified that success in the Palm Beach County marketplace often revolves around "who you know... If you don't have those connections, it's hard to get the same opportunities."

AI-45 shared a personal experience attending a meeting for a new parks job, stating that “it felt like a photo op., [and] someone even told me another contractor already had the job—it was discouraging.” AI-46 noted that “it seems like a lot of bids are already awarded before they’re even announced—it’s hard to see where small businesses fit in.” The County’s informal network appears to be negatively impacting small/new firms as well as the County, as some firms argue that quality of services is compromised for the sake of maintaining long-standing working relationships.

Table 83 (Appendix L: Survey of Business Owners) from the Study’s Survey of Business Owners indicates that 49.3% of participants felt that their company’s exclusion from this informal network has prevented them from winning contracts with Palm Beach County. A relatively smaller percentage (7%) of participants disagreed or strongly disagreed.

Table 83. My company’s exclusion from this informal network has prevented us from winning contracts with Palm Beach County.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	23	2	1	11	1	0	3	10	51
	28 %	33.3 %	16.7 %	33.3 %	25 %	0 %	15.8 %	20 %	25.4 %
Agree	15	2	2	10	0	0	7	12	48
	18.3 %	33.3 %	33.3 %	30.3 %	0 %	0 %	36.8 %	24 %	23.9 %
Neither Agree or Disagree	37	2	3	10	3	0	7	26	88
	45.1 %	33.3 %	50 %	30.3 %	75 %	0 %	36.8 %	52 %	43.8 %
Disagree	6	0	0	0	0	1	0	1	8
	7.3 %	0 %	0 %	0 %	0 %	100 %	0 %	2 %	4 %
Strongly Disagree	1	0	0	2	0	0	2	1	6
	1.2 %	0 %	0 %	6.1 %	0 %	0 %	10.5 %	2 %	3 %
Total	82	6	6	33	4	1	19	50	201

AI-9 cited perceived favoritism in the marketplace as a barrier to participation, stating that "it's kind of a good old boy system here... You're simply not going to get ahead if you don't know the right people." AI-22, a Native American-owned food service firm emphasized that they feel the network favors established vendors. Similarly, AI-18, an African American-owned firm, observed that the County tends to reuse the same firms, excluding new and diverse businesses from breaking into the marketplace. AI-37 offered a similar perspective, and identified an additional issue faced by firms in Palm Beach County, stating that "it's always the same guys getting all the work... National companies stick to their preferred local vendors." The national companies AI-37 referred to highlight issues with large, non-local companies operating in Palm Beach County, often barring smaller firms interested in bidding on contracts from securing work. PI-40 expressed concern with what will happen locally as a result of larger, out-of-town firms controlling who they want to do business with versus as opposed to who deserves the business locally. Discussions surrounding the unfair advantage of non-local firms highlighted a point of confusion for participants, with many believing that firms that do business with the County are required to be domiciled in Palm Beach County. While it is true that certified SBE firms are required to be permanent residents of Palm Beach County, any other firm interested in doing business with the County is only required to be registered as a vendor with them. Firms who wish to operate in the area and believe that they are required to own property/have an address in Palm Beach County identified that they cannot afford an initial or additional property in Palm Beach County, and feel that they are penalized despite often being fairly local, while large, national/international non-local firms who can afford additional property continue to monopolize contracts in Palm Beach County and reuse the same firms repeatedly as subcontractors. While frustrations with large, non-local firms monopolizing the marketplace should be considered, it is crucial that the County works to more effectively communicate regulations regarding location with firms in the area to avoid the unintentional exclusion of small and Minority-owned firms.

AI-26, an African American-owned firm, explained that in such an exclusive network, "it's hard for Minority businesses to even get a foot in the door... without the right connections or guidance." This perspective was echoed by AI-25, AI-29, and AI-32. AI-28 noted that without direct relationships, it is particularly difficult for Minority-owned firms to earn/build credibility. AI-39 and AI-40 both expressed that "getting a seat at the table" is the most challenging part of attempting to do business with the County. AI-13, an African American-owned firm, emphasized the need for access to key decision makers, as well as practical support from the County providing guidance on how to engage and build relationships with said decision-makers.

6. Difficulties for Small Businesses

Many firms that took part in the anecdotal interview process identified themselves as small businesses, and some have found the Palm Beach County marketplace to be difficult to break into, or inaccessible for smaller firms. AI-19, an Asian American-owned firm, identified several significant barriers faced by small businesses in Palm Beach County, including a lack of access to resources, a complex/competitive procurement process (particularly bidding), and significant administrative demands as a result of certification and bidding requirements. They noted that most small firms lack the necessary resources to effectively manage these challenges while maintaining daily operations. AI-40, a White Woman-owned firm, shared a similar experience, emphasizing that small businesses face challenges in scaling and managing the administrative needs for certifications and proposals.

AI-50, an Asian American-owned firm, identified unfair competition with large firms as a primary barrier to participation for themselves as a small firm, stating that "the biggest challenge is resources—large firms have endless budgets and can outshine small businesses in every aspect." AI-28, an Asian American-owned firm, echoed a similar sentiment, explaining that it is expensive to remain active in the marketplace with so little chance of securing contracts as a small firm. In reference to bidding, AI-9, an Asian American-owned firm, explained that large companies with dedicated RFP teams harbor an advantage over smaller businesses like theirs, stating that "people who can afford the professional RFP responders are going to come out ahead... It's pay-to-play."

As outlined in Table 61 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners, 19.8% of firms felt that they were unable to compete with larger firms for contracts in the Palm Beach County marketplace.

Table 61. Unfair competition with large firms.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	82	11	6	43	4	1	59	89	295
	71.9 %	91.7 %	66.7 %	70.5 %	80 %	100 %	90.8 %	88.1 %	80.2 %
Selected	32	1	3	18	1	0	6	12	73
	28.1 %	8.3 %	33.3 %	29.5 %	20 %	0 %	9.2 %	11.9 %	19.8 %
Total	114	12	9	61	5	1	65	101	368

AI-16, a White Woman-owned firm, also articulated that competition with large out-of-town firms and "shell offices" that work to circumvent the County's local requirements is unfair to small firms. PI-10, a small firm, shared that they currently are not certified with the County due to the need for a physical office or home base in Palm Beach County, with the only barrier to participation in the program being that they cannot afford an additional office. Unfair competition with large, non-local firms poses an additional barrier to small firms in the area.

Some firms expressed interest in smaller contracts being accessible/awarded to small M/WBE firms. AI-27, a White Woman-owned firm, identified that large contracts made it difficult for small firms to participate in or contribute to the marketplace. PI-2 shared an example, noting that a recent solicitation for a number of activities was combined into one solicitation. They pointed out that smaller, local companies could easily have provided services if the solicitation was broken up into smaller pieces. AI-26, an African American-owned firm, shared a similar sentiment, stating that "Palm Beach County's opportunities seem geared towards big businesses... Large contracts are not broken into smaller portions that would allow

smaller businesses to bid.” Breaking up larger contracts would allow for smaller firms to bid and engage with County contracts meaningfully. A few firms disagreed, with FG-11 particularly noting that the County is good at working with small businesses in their experience.

AI-1, an African American-owned firm, expressed concern with a lack of available resources for small, Minority-owned businesses in Palm Beach County. AI-14, an African American-owned firm, expressed a slightly different perspective, expressing their skepticism in regard to small business initiatives advertised in Palm Beach County, stating that they see them, but “don’t know if the opportunities actually come to fruition”

While some firms felt that unfair competition with large firms was a primary barrier to doing business with the County, others posited that it might be more structural, citing the lack of a proper “ecosystem” for small businesses in Palm Beach County.

AI-3, an African American-owned firm, described the County’s marketplace as “not conducive to Minority, small businesses” particularly in reference to contract size. They went on to explain that despite wanting to work with the County, they have been unable to find contracts that they have the capacity to take on as a small firm; stating that “a lot of things they ask for, most of us don’t have access to... The majority of us are not positioned to bid for those jobs because we are not qualified.” AI-10, an African American-owned firm, explained that the County has a preference for larger construction focused contracts, contributing to an environment that small businesses cannot survive in. AI-13, an African American-owned firm, agreed, arguing that the County relies on processes that exclude small firms and newer businesses.

7. Prime Contractors & “Good Faith Efforts”

Some firms expressed concern and varying levels of distrust with prime contractors and the County in reference to whether prime contractors in Palm Beach County operate “in good faith” to utilize Minority and Woman-owned firms. AI-3, an African American-owned firm, stated that “there’s no accountability. Even if they’re required to use Minority businesses, no one checks to make sure they’re actually doing it.” The firm recounted multiple instances where they were given unreasonable deadlines or received late requests for large orders, which negatively impacted their ability to deliver.

Table 89 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners highlights the concerns and frustrations of firms who feel that there is a lack of accountability amongst prime contractors in Palm Beach County. According to the table, 41% of participants felt as though some White Male prime contractors/vendors only utilize S/M/WBE companies when required to do so by Palm Beach County. A relatively smaller percentage (5.7%) of participants disagreed or strongly disagreed.

Table 89. I believe that some Non-minority prime contractors/vendors only utilize Small, Minority, and Women-owned companies when required to do so by Palm Beach County.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	40	2	0	14	2	0	6	16	80
	35.1 %	16.7 %	0 %	23 %	40 %	0 %	9.2 %	15.8 %	21.7 %
Agree	20	3	3	10	1	0	9	25	71
	17.5 %	25 %	33.3 %	16.4 %	20 %	0 %	13.8 %	24.8 %	19.3 %
Neither Agree or Disagree	53	7	5	29	1	1	45	55	196
	46.5 %	58.3 %	55.6 %	47.5 %	20 %	100 %	69.2 %	54.5 %	53.3 %
Disagree	1	0	1	5	0	0	3	3	13
	0.9 %	0 %	11.1 %	8.2 %	0 %	0 %	4.6 %	3 %	3.5 %
Strongly Disagree	0	0	0	3	1	0	2	2	8
	0 %	0 %	0 %	4.9 %	20 %	0 %	3.1 %	2 %	2.2 %
Total	114	12	9	61	5	1	65	101	368

AI-21, White Woman-owned firm, stated, "Prime contractors sign up distributors to hit their numbers but cut out small businesses when it comes to the actual work" in an effort to bypass requirements to engage S/M/WBEs. AI-25, an African American-owned construction firm, shared a similar perspective with an emphasis on the experience of SBEs, noting that primes sometimes "fail to honor the spirit of the Small Business Enterprise (SBE) program," which can lead to unequal opportunities. S/M/WBE firms who are listed on and removed from contracts often are not informed that it is happening, leaving them unable to object to this harmful practice.

Table 87 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners confirms concerns expressed by participants across other data collection methods, indicating that 26.6% of participants agreed that some White Male prime contractors/vendors will include a S/M/WBE company on a bid or other solicitation to meet participation goals, then drop the company as a subcontractor after winning the award. A relatively smaller percentage (6.8%) of participants disagreed or strongly disagreed.

Table 87. Sometimes, a prime contractor/vendor will include a Small, Minority, or Woman-owned subcontractor on a bid or other solicitations to meet participation goals, then drop the company as a subcontractor after winning the award.

Owners' Minority Status									
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	Total
Strongly Agree	14	1	1	13	1	0	4	9	43
	12.3 %	8.3 %	11.1 %	21.3 %	20 %	0 %	6.2 %	8.9 %	11.7 %
Agree	26	2	1	9	0	0	9	8	55
	22.8 %	16.7 %	11.1 %	14.8 %	0 %	0 %	13.8 %	7.9 %	14.9 %
Neither Agree or Disagree	68	8	6	31	3	1	46	82	245
	59.6 %	66.7 %	66.7 %	50.8 %	60 %	100 %	70.8 %	81.2 %	66.6 %
Disagree	6	1	1	4	0	0	2	1	15
	5.3 %	8.3 %	11.1 %	6.6 %	0 %	0 %	3.1 %	1 %	4.1 %
Strongly Disagree	0	0	0	4	1	0	4	1	10
	0 %	0 %	0 %	6.6 %	20 %	0 %	6.2 %	1 %	2.7 %
Total	114	12	9	61	5	1	65	101	368

Table 86 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners identifies a similar and equally harmful practice that negatively impacts S/M/WBEs in the County. According to the table, 35.4% of participants agreed that some White Male prime contractors/vendors will contact a S/M/WBE company to ask for quotes but never give the proposal sufficient review to consider giving that firm the award, with 50% of respondents being African American-owned firms, 47.6% Hispanic American-owned firms, and 35.4% Woman-owned firms. A relatively smaller percentage (5.5%) of participants disagreed or strongly disagreed.

Table 86. Sometimes, a prime contractor/vendor will contact a Small, Minority, or Woman-owned business to ask for quotes but never give the proposal sufficient review to consider giving that firm the award.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	24	1	0	14	1	0	6	12	58
	21.1 %	8.3 %	0 %	23 %	20 %	0 %	9.2 %	11.9 %	15.8 %
Agree	33	2	3	15	0	0	6	13	72
	28.9 %	16.7 %	33.3 %	24.6 %	0 %	0 %	9.2 %	12.9 %	19.6 %
Neither Agree or Disagree	55	8	6	26	3	1	47	72	218
	48.2 %	66.7 %	66.7 %	42.6 %	60 %	100 %	72.3 %	71.3 %	59.2 %
Disagree	2	1	0	2	0	0	2	1	8
	1.8 %	8.3 %	0 %	3.3 %	0 %	0 %	3.1 %	1 %	2.2 %
Strongly Disagree	0	0	0	4	1	0	4	3	12
	0 %	0 %	0 %	6.6 %	20 %	0 %	6.2 %	3 %	3.3 %
Total	114	12	9	61	5	1	65	101	368

A couple of firms expressed concerns with prime contractors in Palm Beach County operating as "fronts" to secure contracts. In the context of M/WBEs, firms will claim that the majority owner of the firm is a Minority/Woman despite them not offering any commercially useful functions to the business to obtain M/WBE certification. AI-19, an Asian American-owned firm, noted that they were familiar with instances of prime contractors using Minority- or Woman-owned firms as fronts to secure contracts, effectively bypassing the intent of good faith goals.

Despite concerns raised by firms in Palm Beach County, some firms shared positive experiences working with prime contractors in the County. AI-5, an Asian American-owned construction firm, noted that they

are not aware of any practices used by prime contractors in an attempt to bypass working with S/M/WBE firms, stating that most prime contractors adhere to County requirements.

8. Lack of Information and Access to Capital

AI-4, an African American-owned firm, explained that "the biggest issue is trying to shift to a business mindset... We have access to resources, but not a step-by-step instruction on how to go from point A to having a successful business." They identified that a significant obstacle for them and many other Minority-owned firms was lack of access to foundational knowledge related to business. They expressed that the provision of resources without an understanding of how to effectively engage them to achieve success has left many Minority business owners stuck, unable to grow. AI-11, an African American-owned firm, stated, "What you don't know, you don't know... We need a guide from A to Z that shows us what to do and how to get there." They highlighted that knowledge gaps paired with lack of clear guidance act as primary barriers to Minority-owned businesses. AI-23, an African American-owned firm found that limited access to information and guidance "feels like you're set up to fail." PI-16 agreed, suggesting that a mentorship program or "class on how to source opportunities" with certification would be a great support for small and Minority firms in the area. AI-15, a White Male-owned firm, echoed these perspectives, stressing the need for clear and simplified communication to aid growth for these firms.

AI-19, an Asian American-owned firm, noted that the County does not appear to care for Minority-owned firms, stating that "the County doesn't seem to care if you actually get business—they just want to check a box for having Black vendors on their list." The firm feels that Minority-owned businesses are often underfunded and undervalued, with lack of access to effective support from the County.

AI-3 identified that access to capital is one of the most significant challenges faced by Minority-owned firms in Palm Beach County. AI-14 agreed, referring to these as "systemic barriers." Minority-owned firms who struggle to access capital often also struggle to build credibility due to lack of trust, specifically as people of color (AI-46), leaving them with limited fiscal and relational resources to build their businesses. Many firms are unable to survive long enough in the marketplace to overcome these barriers, with AI-29 noting that "minority businesses often don't have the resources to stay in the game long enough to see returns." On a practical level, lack of access to capital bars firms from bidding due to inability to meet bonding/insurance/financing requirements, and a lack of trust for Minority-owned firms ingrained on both an individual and institutional level make it difficult to obtain loans or build strategic relationships that would support them in getting a foot in the door. AI-8, an African American-owned firm, provided an additional unique perspective, arguing that lack of ability to access capital at all is also an issue, stating that "for some people coming out of prison with no credit history, it's impossible to meet those standards." AI-13, an African American-owned firm, offered a different perspective, stating, "Shelf-ready businesses with bona fide qualifications are what's needed, but many aren't prepared for the demands of these contracts." The firm argued that barriers faced by Minority-owned firms often extend beyond external systemic issues and include lack of preparedness among business owners which leads to perceptions of unreliability.

Participants who identified issues related to access overwhelmingly expressed interest in beginning or continuing to do business with/in the County, requesting more robust support and guidance in reference to knowledge, capital, and care for Minority-owned firms. Business owners shared desires to "level the

playing field” for small and Minority-owned firms, expanding the marketplace and ultimately benefiting the County.

Building Generational Business: Overcoming Barrier to Access

AI-9 is an Asian American business owner. They own two media companies with a focus on public relations and content production and built their business from the ground up on their own. They leveraged storytelling and media skills acquired over the years with a unique skill set in health to transform complex medical information into community friendly messaging.

Initially, the financial start-up process for their businesses was extremely challenging, as they had to build the foundation for their company with no external funding. “We built this off our backs... No financial resources were available, and it was the most disorienting process to get support,” stated the business owner. Lack of access to information, resources, and financial guidance took a significant and unnecessary toll on the firm in the early stages of developing the business. They were only recently able to access financial professionals who provided support, educating them on important concepts like “good debt,” and effective strategies for building credit, highlighting that access to financial guidance and trust in banking partners was crucial to their financial success as a firm.

With the access they currently have to knowledge and information regarding navigating the marketplace, and financial resources/support, AI-9 is focused on creating a “generational business,” with their children actively involved in managing one of their two companies. Understanding the necessity for mentorship, financial literacy, and proactive guidance for Minority business owners, they are firm in setting up their children, and Minority-owned businesses that enter the marketplace after them for success. They identified the value in their children having access to this knowledge and support at an earlier stage in their career, emphasizing, “My kids won’t have to get it from the mud as much as I did because of what I learned... I’m setting them up for a different experience.”

9. Insurance, Bonding, and Credit

Insurance, bonding, credit, and financing were all identified as barriers to participation by anecdotal participants with specific attention on their harmful impacts on small and Minority-owned businesses in the area. AI-3, an African American-owned firm, emphasized that lack of access to capital is a significant issue faced by small and Minority-owned firms in Palm Beach County, stating, “I had \$100,000 saved up and a credit score over 730, but even then, I didn’t qualify for a loan. The process was harder than with a traditional bank.” They articulated that denial of access to loans and working capital can often leave small businesses unable to meet financial/pre-qualification requirements needed to bid on larger County contracts. AI-11, an African American-owned firm, had a similar experience, stating, “I used my own money to start, but it would’ve been easier if there were accessible financial resources for small businesses.” AI-43, a Hispanic American-owned firm, echoed the above, emphasizing the importance of access to capital, explaining that “access to financial resources and better visibility into local opportunities would make it easier for small businesses to thrive.”

Table 48 (Appendix L: Survey of Business Owners) indicates that 13.3% of participants identified Financing as a barrier to their firm obtaining work in County.

Table 48. Financing									
Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	85	12	7	54	5	1	60	95	319
	74.6 %	100 %	77.8 %	88.5 %	100 %	100 %	92.3 %	94.1 %	86.7 %
Selected	29	0	2	7	0	0	5	6	49
	25.4 %	0 %	22.2 %	11.5 %	0 %	0 %	7.7 %	5.9 %	13.3 %
Total	114	12	9	61	5	1	65	101	368

Table 44 (Appendix L: Survey of Business Owners) indicates that 15.5% of participants identified Pre-qualification requirements as a barrier to their firm obtaining work with the County.

Table 44. Pre-qualification requirements									
Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	89	9	6	49	4	1	61	92	311
	78.1 %	75 %	66.7 %	80.3 %	80 %	100 %	93.8 %	91.1 %	84.5 %
Selected	25	3	3	12	1	0	4	9	57
	21.9 %	25 %	33.3 %	19.7 %	20 %	0 %	6.2 %	8.9 %	15.5 %
Total	114	12	9	61	5	1	65	101	368

Bonding was identified as a barrier to participation by anecdotal participants. AI-47, a Hispanic American-owned firm, explained that bonding requirements are a particularly big challenge for small firms because “without a track record of bigger projects, it’s hard to increase your capacity, and you’re stuck bidding on smaller jobs.” AI-8 cited challenges with bonding and financial requirements as significant barriers to participation, noting that the County’s bond requirements are difficult for small businesses to meet, which limits their ability to bid on County contracts. Similarly, AI-25 noted that “without adequate cash flow or bonding capacity, it’s nearly impossible for smaller businesses to compete on larger projects.” AI-8, an African American-owned firm, expressed disappointment with the lack of support with securing bonding or credit for small businesses, stating that “I’d love to see a ladder program for small businesses who may not have the bonding or credit requirements [to bid on County contracts]. It’s hard to compete without that support.”

Table 47 (Appendix L: Survey of Business Owners) indicates that 10.9% of participants identified bid bond requirements as a barrier to their firm obtaining work with the County.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	99	11	8	51	4	1	58	96	328
	86.8 %	91.7 %	88.9 %	83.6 %	80 %	100 %	89.2 %	95 %	89.1 %
Selected	15	1	1	10	1	0	7	5	40
	13.2 %	8.3 %	11.1 %	16.4 %	20 %	0 %	10.8 %	5 %	10.9 %
Total	114	12	9	61	5	1	65	101	368

Insurance was also identified as a barrier to participation by some firms. When discussing contracts with the County, AI-34, a White Woman-owned firm, stated, “The insurance costs alone are a huge barrier—\$45,000 a year for workers’ comp and liability is a big commitment for smaller businesses.” AI-37, a Hispanic American-owned firm, also shared their frustrations with what they identify as excessive insurance requirements, stating, “Before you even get the job, they’re asking for crazy insurance policies... How can a small contractor manage that?” AI-36, a Hispanic American-owned firm, agreed, noting that rising costs for insurance make it challenging to bid competitively with the County.

Table 49 (Appendix L: Survey of Business Owners) indicates that 9.5% of participants identified Insurance requirements as a barrier to their firm obtaining work with the County.

Table 49. Insurance requirements

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	98	11	7	55	5	1	63	93	333
	86 %	91.7 %	77.8 %	90.2 %	100 %	100 %	96.9 %	92.1 %	90.5 %
Selected	16	1	2	6	0	0	2	8	35
	14 %	8.3 %	22.2 %	9.8 %	0 %	0 %	3.1 %	7.9 %	9.5 %
Total	114	12	9	61	5	1	65	101	368

AI-13, an African American-owned firm, shared that as a former banking professional, they observed that financial barriers, such as lack of capital, and restrictive bonding and insurance requirements disproportionately affected small and Minority-owned businesses in Palm Beach County, made worse by a lack of adequate support to impacted firms.

10. Prompt Pay

Both prime and subcontractors operating in Palm Beach County expressed their concerns with lack of prompt pay and its effect on cash flow. FG-5 noted that the County is slow to pay contractors, and lack of working capital can be difficult for small firms. AI-2, an Asian American-owned firm, expressed concern with the inconsistencies in payment processes from the County, which lead to delays in pay for firms, including themselves. They shared a particular experience in which they had an invoice rejected for a minor discrepancy, despite having been previously paid by the County for a similar invoice. Inconsistency on the County's part left them in a difficult situation, with the firm stating, "The rules are changed, and it's like, 'Oh no, we can't pay this invoice because of ABC,' even though I got paid with no problem before." While it is understandable that the County has regulations for invoice formatting/information, inconsistent enforcement of these regulations, and inadequate measures to promptly resolve any issues ultimately harms firms who do business with the County.

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According to Table 41 of the Study's Survey of Business Owners (Appendix L: Survey of Business Owners), upon receipt of invoice to the County, 46.6% of prime contractors are paid within thirty (30) days, while 24.1% of business owners are paid within sixty (60) days, 15.5% of firms are paid within ninety (90) days, and 3.4% noted that they waited more than 120 days to receive payment.

Table 41. What is the amount of time that it typically takes to receive payment from Palm Beach County from the time you submit your invoice for your services on Palm Beach County projects?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
1-30 days	12	0	2	5	0	0	4	4	27
	66.7 %	0 %	100 %	45.5 %	0 %	0 %	36.4 %	28.6 %	46.6 %
31-60 days	3	1	0	2	0	0	3	5	14
	16.7 %	50 %	0 %	18.2 %	0 %	0 %	27.3 %	35.7 %	24.1 %
61-90 days	1	0	0	1	0	0	2	2	6
	5.6 %	0 %	0 %	9.1 %	0 %	0 %	18.2 %	14.3 %	10.3 %
91-120 days	0	0	0	0	0	0	1	2	3
	0 %	0 %	0 %	0 %	0 %	0 %	9.1 %	14.3 %	5.2 %
Over 120 days	0	0	0	0	0	0	1	1	2
	0 %	0 %	0 %	0 %	0 %	0 %	9.1 %	7.1 %	3.4 %
Don't Know/NA	2	1	0	3	0	0	0	0	6
	11.1 %	50 %	0 %	27.3 %	0 %	0 %	0 %	0 %	10.3 %
Total	18	2	2	11	0	0	11	14	58

AI-6, a White Woman-owned firm, shared that, in their experience, payment often takes months to receive, creating cash flow challenges for their firm. AI-8, an African American-owned firm, has had a similar experience, stating that "the turnaround on their payment... was terrible. It wasn't quick at all, and that was the most disturbing part." This slow turnaround acted as a barrier for her business due to limited cash flow as a small firm. PI-59 shared that they have had mixed experiences with the County in reference to pay, stating that "some are wonderful and included me on the work and paid me within 30 days of submitting my invoice... Some do not invoice for 7-9 months in a pay-when-paid type of contract." They went on to note that slow turnaround also negatively impacts them as a smaller firm. AI-25, an African American-owned firm, explained that "Most of [their] work comes from Palm Beach County, and the opportunities

are there, but subcontractors often bear the financial burden upfront, which can be tough." AI-49, a Hispanic American-owned consulting firm, agreed, noting that "if the prime doesn't invoice the project for months, you're stuck waiting for payment—it's tough on cash flow." While opportunities are beneficial to small firms in Palm Beach County, consistently delayed pay can exacerbate financial strain for small firms operating as subcontractors in Palm Beach County.

According to Table 43 of the Study's Survey of Business Owners (Appendix L: Survey of Business Owners), upon receipt of invoice to prime contractors, 20.9% of subcontractors are paid within thirty (30) days, while 29.9% of business owners are paid within sixty (60) days, 26.9% of firms are paid within ninety (90) days, and 7.5% noted that they waited more than 120 days to receive payment.

Table 43. What is the amount of time that it takes to receive payment from prime contractors/vendors from the time you submit your invoice for your services on Palm Beach County projects?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
15 days or less	2	0	0	1	0	0	1	2	6
	11.1 %	0 %	0 %	7.7 %	0 %	0 %	7.1 %	11.1 %	9 %
16-30 days	2	0	0	3	0	0	1	2	8
	11.1 %	0 %	0 %	23.1 %	0 %	0 %	7.1 %	11.1 %	11.9 %
31-60 days	6	0	0	4	1	0	3	6	20
	33.3 %	0 %	0 %	30.8 %	100 %	0 %	21.4 %	33.3 %	29.9 %
61-90 days	4	0	0	2	0	0	4	3	13
	22.2 %	0 %	0 %	15.4 %	0 %	0 %	28.6 %	16.7 %	19.4 %
91-120 days	1	1	0	0	0	0	2	1	5
	5.6 %	33.3 %	0 %	0 %	0 %	0 %	14.3 %	5.6 %	7.5 %
Over 120 days	2	0	0	0	0	0	2	1	5
	11.1 %	0 %	0 %	0 %	0 %	0 %	14.3 %	5.6 %	7.5 %
Don't Know/NA	1	2	0	3	0	0	1	3	10
	5.6 %	66.7 %	0 %	23.1 %	0 %	0 %	7.1 %	16.7 %	14.9 %
Total	18	3	0	13	1	0	14	18	67

Lack of prompt payment is a pressing issue in Palm Beach County, as clearly outlined by the Survey of Business Owners, and the shared experiences of prime and subcontractors doing business with the County. Firms shared that disruption to cash flow for firms in the area can be detrimental, potentially interrupting, delaying, or halting their ability to do business in Palm Beach County.

11. Perceived Limited Opportunities

Some firms operating in Palm Beach County expressed that its marketplace is limiting, favoring particular industries and making it impossible to break into for firms who do not provide a particular set of services.

AI-10, an African American-owned firm, observed that the marketplace is heavily oriented toward certain industries, particularly construction. As a result, construction dominates most of the large contracts in Palm Beach County, leaving limited support and opportunity for businesses outside of these sectors. They stated that as a firm providing professional and leadership training, "I'd love to get a \$200,000 contract, but my field isn't in construction, where most large contracts seem to go." AI-18, an African American-owned firm, similarly found that Palm Beach County tends to favor food and beverage and construction businesses, referring to the marketplace as "narrow" and "limiting." The firm noted that a lack of support for non-traditional industries like leadership development can foster systemic bias against creative or innovative approaches to business, stating that "the marketplace is stagnant... There is no clear path for leadership development vendors like me, and the County's processes don't prioritize creativity or innovation."

As outlined in Table 21 (Appendix L: Survey of Business Owners) from the Study's Survey of Business Owners, 21.1% of participants have not attempted to do business with the County because they do not see opportunities in their field of work.

Table 21. Do not see opportunities in my field of work.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	5	0	1	5	2	0	3	14	30
	83.3 %	0 %	100 %	83.3 %	100 %	0 %	60 %	77.8 %	78.9 %
Selected	1	0	0	1	0	0	2	4	8
	16.7 %	0 %	0 %	16.7 %	0 %	0 %	40 %	22.2 %	21.1 %
Total	6	0	1	6	2	0	5	18	38

A narrow, limited marketplace in Palm Beach County could contribute to the underutilization of small and Minority-owned firms in the area, excluding capable firms from doing business with the County.

D. Conclusion

G&S engaged with business owners and community organizations through several different data gathering methods and concluded that businesses in Palm Beach County are concerned with informal networks, lengthy and difficult bidding and certification processes, inauthentic good faith efforts from prime contractors, discrimination, difficulties faced by small businesses, lack of access to information and capital, issues with prompt pay, as well as lack of effective communication and outreach from the County and a perceived limiting marketplace.

Participants across multiple forums articulated that poor communication, outreach, and engagement was detrimental to small and Minority-owned businesses looking to break into Palm Beach County's marketplace, and attempt to navigate lengthy, paperwork heavy certification and bidding processes. Business owners are often unsure of how to engage with or attempt to do business with Palm Beach County, and what resources may be available to them currently.

Firms reported that there is an informal network of contractors in Palm Beach County who have access to otherwise unreachable County officials and information regarding County projects. They also identified that they feel the County does not currently have an "ecosystem" that facilitates the existence of small firms in the marketplace, leaving firms discouraged and unable to compete with larger and established firms.

Interviewees and survey participants raised concerns with discrimination in the public and private sector, with both Women and Minority-owned firms having experienced and/or perceived discrimination that hindered their ability to do business in Palm Beach County.

In summary, Palm Beach County has the opportunity to make meaningful changes by addressing issues raised by the business community. Existing resources provided by the County have been identified as beneficial but by some viewed as "surface level," and can be built upon to better support firms in Palm Beach County.



APPENDIX A

DEFINITIONS

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX A: DEFINITIONS

Anecdotal: A reported personal experience or encounter, retold through interview, testimony, email, or survey. Not necessarily verified or based on research.

Availability Estimates: A term of art in disparity studies that refers to the percentage of ready, willing, and able firms in the entity's Relevant Geographic Market Area in each Industry Category that is disaggregated by race/ethnicity/gender.

City of Richmond v. J.A. Croson Company 488 U.S. 469 (1989) ("Croson"): Laws that, on their face, favor one class of citizens over another, may run afoul of the Equal Protection Clause of the 14 Amendment of the U.S. Constitution even if those laws are meant to remedy discrimination. Such laws, including those that create race conscious programs, must withstand judicial "strict scrutiny" or they will be dismantled. In its Croson decision, the Supreme Court ruled that the City of Richmond's Minority Business Enterprise (hereinafter "MBE") program failed to satisfy the requirements of "strict scrutiny" review under the 14th Amendment "Strict scrutiny" review involves two co-equal considerations to determine whether a race conscious program can withstand the Strict Scrutiny: First, the need to demonstrate a compelling governmental interest (which may be established through periodic disparity studies); second, implementation of a program or method narrowly-tailored to achieve/remedy the compelling interest. In Croson, the Supreme Court concluded that the City of Richmond failed to show that its minority set-aside program was "necessary" to remedy the effects of discrimination in the marketplace.

Construction: For the purposes of the Palm Beach County, FL, Disparity Study, means the horizontal and vertical construction including, erection, repair, renovation, or demolition, building, street, road, and all construction trades. Construction is one of the Palm Beach County, FL Disparity Study Industry Categories.

Disparity Index: A statistical measure demonstrated by the failure to meet Parity between Availability and Utilization. Disparity is calculated by comparing the Utilization percentage to the Availability percentage of each race/gender/ethnic group. Will result in either Overutilization, Underutilization, or Parity.

Disparity Study ("Study"): A tool, identified by the Supreme Court as necessary for satisfying the strict scrutiny threshold for race conscious programs and demonstrating the compelling governmental interest by "factual predicate" that identifies discrimination and a narrowly tailored remedy to redress any finding of discrimination. Must adhere to the legal requirements of U.S Supreme Court decisions like City of Richmond v. J.A. Croson Company, 488 U.S. 469 (1989) and its progeny. Disparity studies are not designed to be an analysis of any current remedial programs but an analysis of race, ethnicity, and gender status and how it affects participation in the procurement process and in the marketplace.

Fiscal Year (FY): The Palm Beach County fiscal year is from October 1st to September 30th.

Goods/Commodities: For the purposes of the Palm Beach County, FL, Disparity Study, means commodities, materials, supplies, and equipment. Goods/Commodities is one of the Palm Beach County, FL, Disparity Study Industry Categories.

Good Faith Efforts ("GFE"): The documentation and verification process to ensure that prime contractors are soliciting and negotiating with M/WBES in "good faith" for potential subcontracting opportunities.

Miami-Fort Lauderdale-West Palm Beach MSA: For purposes of anecdotal outreach for Anecdotal Interviews, Public Input Sessions, and Focus Groups, the market area is the Miami-Fort Lauderdale-West Palm Beach Metropolitan Statistical Area ("MSA") from the U.S. Census Bureau.

Industry Categories: Means, collectively, the Industry Categories included in the Disparity Study, which are: Construction, Professional Services (CCNA), Professional Services (Non-CCNA), Services, and Goods/Commodities, as those Industry Categories are defined in this section.

Minority Group Member: Means those persons, citizens of the United States and lawfully admitted resident aliens, who are defined as African American, Asian American, Hispanic American, or Native American.

Minority- or Women-Owned Business Enterprise (“M/WBE”): Means a certified for-profit, independent operating business that is at least 51% owned, operated, and controlled by minority person(s) and/or a woman or women. The ownership by minorities and women must be real and substantial. The minority group member(s) or women must have operational and managerial control, interest in capital, and earnings commensurate with the percentage of ownership.

Overutilization: The measure by which the utilization percentage is higher than the availability percentage and the Disparity Index is above 100. In order to be statistically significantly overutilized, the Disparity Index must be 100 or more.

Parity: The absence of disparity, demonstrated by the utilization percentage being equal to availability percentage and the Disparity Index equaling 100.

Prime Contractor: A business who has entered into a direct contractual relationship with Palm Beach County, FL, or other public or private entity to provide goods or services.

Qualitative Analysis: Also known as anecdotal analysis. Referring to a measurement of quality (e.g. how good over how much). Typified through collection and analysis of constituents’ anecdotal impressions, such as interviews, public hearings, focus groups, and other forms of commentary.

Quantitative Analysis: Commonly referred to as statistical analysis. Referring to a measurement of quantity over quality (e.g., how much over how good). Typified by analysis of mathematical or statistical modeling.

Regression Analysis: Statistical measure used to determine whether the race, ethnicity, or gender status of a business owner is an impediment in contracting in the Palm Beach County, FL, Relevant Geographic Market Area and whether but for these, they would have the capacity to provide services on a higher level than is currently utilized. This analysis is also used to determine the likelihood that certain factors other than race, gender, and ethnicity are the driving factors behind any disparities identified in the Study.

Relevant Geographic Market Area: A term of art in disparity studies that refers to the geographical area in which the entity spends at least 75% of its dollars based upon firm location. For the Palm Beach County, FL Disparity Study, the Relevant Geographic Market Area is Palm Beach County, FL. The Relevant Geographic Market Area is used for the Quantitative Analysis and Marketplace Contracting Disparities Analysis.

Strict Scrutiny: The highest level of judicial scrutiny used in determining the constitutionality of laws.

Study Period: The period between which all Palm Beach County, FL, payments are subject to study analysis. For this study it has been defined as five (5) years from January 1, 2019 – December 31, 2023 (CY2019-CY2023).

Subcontractor: A business who has entered into a direct contractual relationship with a Prime Contractor to either provide a good or service or perform a full scope, or portion of a scope of services.

Underutilization: The measure by which the utilization percentage is less than the availability percentage and the Disparity Index is below 100. In order to be statistically significantly underutilized, the Disparity Index must be 80 or less.

Utilization: A review of Palm Beach County’s payments to determine where and with whom Prime Contractor and Subcontractor payments were made. The analysis is conducted both with regard to the number of firms and the dollars in each race, ethnicity, and gender group during each year of the Study.



APPENDIX B

EXPANDED LEGAL ANALYSIS

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX B: EXPANDED LEGAL ANALYSIS

A. Methodological Guidance and Legal Defensibility Considerations

There are several important legal standards and considerations which arise when a constitutional challenge is made against a procurement program or policy for firms that are classified by race, ethnicity, or gender (M/WBE), and each will be addressed herein in turn. G&S also provides in this analysis an overview of some of the key aspects of its own study methodology for gathering and analyzing statistical and anecdotal evidence (which provides the “factual predicate” for any remedial program/policy), and discussion of the underlying legal bases for these methodological features.

1. Equal Protection and Levels of Judicial Scrutiny

The Fourteenth Amendment provides that “No state shall . . . deny to any person within its jurisdiction the equal protection of the laws.” U.S. Const. amend. XIV, § 1. When a program or ordinance provides race/ethnicity-based policies or remedies, equal protection considerations are triggered, and the court will apply what is referred to as “strict scrutiny” in evaluating its constitutional legitimacy. When gender-based, the program (or policy) will be reviewed under the less-stringent “intermediate scrutiny” standard.

a) Racial and Ethnic Classifications

“We have held that all racial classifications imposed by government must be analyzed by a reviewing court under strict scrutiny.”¹ The Eleventh Circuit previously explained its view of the rationale for this level of judicial review:

Because the [Black Business Enterprise] and [Hispanic Business Enterprise] programs create preferences based on race and ethnicity, the relevant constitutional standard applicable to those programs is the strict scrutiny test articulated in City of Richmond v. J.A. Croson Co., 488 U.S. 469, 109 S.Ct. 706, 102 L.Ed.2d 854 (1989). That test requires a “searching judicial inquiry” into the justification for the preference, because without that kind of close analysis “there is simply no way of determining what classifications are ‘benign’ or ‘remedial’ and what classifications are in fact motivated by illegitimate notions of racial inferiority or simple racial politics.” Id. at 493, 109 S.Ct. at 721. Accordingly, strict scrutiny is designed both to ‘smoke out’ illegitimate uses of race by assuring that the legislative body is pursuing a goal important enough to warrant use of a highly suspect tool” and to “ensure[] that the means chosen ‘fit’ this compelling goal so closely that there is little or no possibility that the motive for the classification was illegitimate racial prejudice or stereotype.” Id.

Under strict scrutiny, an affirmative action program must be based upon a “compelling governmental interest” and must be “narrowly tailored” to achieve that interest. *E.g.*, Ensley Branch, 31 F.3d at 1564 (citations omitted). As we have observed: In practice, the interest that is alleged in support of racial preferences is almost always the same—remedying past or present discrimination. That interest is widely accepted as

¹ Grutter v. Bollinger, 539 U.S. 306, 326 (2003); see also Adarand III, 515 U.S. 200 at 212 (1995).

compelling. As a result, the true test of an affirmative action program is usually not the nature of the government's interest, but rather the adequacy of the evidence of discrimination offered to show that interest. *Id.* at 1565 (citations and internal quotation marks omitted).²

Thus, under strict scrutiny, a racial or ethnic classification must (1) serve a compelling state interest and (2) be narrowly tailored to achieve that interest.³ These concepts are covered more fully below.

As discussed in the Legal Analysis Chapter, the Eleventh Circuit Court of Appeals ruled in an unpublished opinion that the strict scrutiny standard also applies to aspirational, non-binding M/WBE goals programs because such goals programs are still based on racial classification.⁴ The Supreme Court has not yet addressed this particular issue, so the *Virdi* ruling remains persuasive in this Circuit.

b) Gender Classifications

Though still unsettled in some federal circuits, the Eleventh Circuit has accepted that programs with gender-based classifications are evaluated for constitutionality under a more relaxed level of scrutiny than race-based ones, *i.e.*, intermediate scrutiny:

There is a long line of directly applicable Supreme Court precedents applying traditional intermediate scrutiny to gender classifications. More specifically, the Supreme Court held in *Mississippi University for Women v. Hogan*, 458 U.S. 718, 724, 102 S.Ct. 3331, 3335, 73 L.Ed.2d 1090 (1982), that intermediate scrutiny was the appropriate test to apply to a gender-based classification favoring women, which is the same type of classification created by the County's WBE program. Instead of overruling *Mississippi University for Women*, the *VMI* Court cited that case as "immediately in point" and the "closest guide" for the *VMI* decision itself. *VMI*, --- U.S. at ---, ---, 116 S.Ct. at 2275, 2271. The Supreme Court is not in the practice of overruling its own precedents by citing them with approval, and we decline to hold that the Court did so in the *VMI* case. Unless and until the Supreme Court tells us otherwise, intermediate scrutiny remains the applicable constitutional standard in gender discrimination cases, and a gender preference may be upheld so long as it is substantially related to an important governmental objective.⁵

c) Classifications Other than Race, Ethnicity, or Gender

For procurement programs or policies benefiting firms identifiable and/or certified by socioeconomic classifications or categories that are not based on race, ethnicity, or gender (*e.g.*, small businesses (SBEs),

² *Engineering Contractors Ass'n of S. Fla. v. Metro. Dade Cnty.*, 122 F.3d 895, 906 (11th Cir. 1997).

³ *Id.* at 906.

⁴ *Virdi v. Dekalb Cnty. School Dist.*, 135 Fed. App'x 262, 267 (11th Cir. 2005).

⁵ *Engineering Contractors*, 122 F.3d at 907-908; *see also Massachusetts v. U.S. Dep't of Health & Hum. Services*, 682 F.3d 1, 8-9 (1st Cir. 2012) ("Gender-based classifications invoke intermediate scrutiny and must be substantially related to achieving an important governmental objective.").

veteran owned businesses (VBEs), businesses owned by disabled persons (DisBEs), the level of constitutional scrutiny that applies is the simplest for a governmental entity to meet – the “rational basis” test. Under this analysis, the entity need only show a rational relationship between the classification/policy and a legitimate legislative goal or end.

The general rule is that legislation is presumed to be valid and will be sustained if the classification drawn by the statute is rationally related to a legitimate state interest. When social or economic legislation is at issue, the Equal Protection Clause allows the States wide latitude, and the Constitution presumes that even improvident decisions will eventually be rectified by the democratic process. The general rule gives way, however, when a statute classifies by race, alienage, or national origin.⁶

In the context of procurement, the rationale behind this lower level of scrutiny is to permit procuring entities sufficient discretion to implement programs in ways that achieve the underlying legislative purpose:

Effective contracting demands broad discretion. Accordingly, agencies are entrusted with a good deal of discretion in determining which bid is most advantageous to the Government. Contracting officers are entitled to exercise discretion upon a broad range of issues confronting them in the procurement process, and accordingly, procurement decisions are subject to a highly deferential rational basis review.⁷

2. The Government as Active or Passive Participant in Discrimination

The Supreme Court has uniformly held that general societal discrimination is insufficient to justify the use of race-based measures to satisfy a compelling governmental interest.⁸ Rather, there must be some showing of prior discrimination by the governmental actor involved, either as an “active” or “passive” participant.⁹ The upshot of this dual-faceted (active/passive) evaluation of the enacting governmental entity is that, even if the entity did not directly discriminate, it can take corrective action.¹⁰

⁶ *City of Cleburne, Tex. v. Cleburne Living Ctr.*, 473 U.S. 432, 440-442 (1985); see also *Massachusetts*, 682 F.3d at 9 (“Equal protection claims tested by this rational basis standard, famously called by Justice Holmes the ‘last resort of constitutional argument,’ rarely succeed. Courts accept as adequate any plausible factual basis, without regard to Congress’ actual motives. Means need not be drawn narrowly to meet – or even be entirely consistent with – the stated legislative ends.”); *Doe v. Univ. of Md. Med. Sys. Corp.*, 50 F.3d 1261, 1267 (4th Cir. 1995) (“Classifications involving individuals with disabilities are subject only to rational basis scrutiny. . . . [Differing treatment] is presumed to be valid and will be sustained if the classification is rationally related to a legitimate state interest.”).

⁷ *Ranger Am. of Puerto Rico, Inc. v. United States*, 153 Fed. Cl. 744, 766-767 (Ct. of Fed. Claims 2021) (citations omitted).

⁸ *Adarand III*, 515 U.S. at 227; *Croson*, 488 U.S. at 496-97.

⁹ *Croson*, 488 U.S. at 498.

¹⁰ *Engineering Contractors*, 122 F.3d at 907 (“[I]f the County could show that it had essentially become a ‘passive participant’ in a system of racial exclusion practiced by elements of the local construction industry, the Supreme Court has made it clear that the [County] could take affirmative steps to dismantle such a system.”); citing *Croson*, 488 U.S. at 492.

Subsequent lower court rulings have provided more guidance on passive participation by state or local governments. In Concrete Works of Colorado, Inc. v. City of Denver,¹¹ the Tenth Circuit held that it was sufficient for the local government to demonstrate that it engaged in passive participation in discrimination rather than showing that it actively participated in the discrimination:

Neither Croson nor its progeny clearly state whether private discrimination that is in no way funded with public tax dollars can, by itself, provide the requisite strong basis in evidence necessary to justify a municipality's affirmative action program. Although we do not read Croson as requiring the municipality to identify an exact linkage between its award of public contracts and private discrimination, such evidence would at least enhance the municipality's factual predicate for a race/gender-conscious program.¹²

Thus, the desire for a government entity to prevent the infusion of public funds into a discriminatory industry is enough to satisfy the requirement.

The next question, however, is whether a public entity has the requisite factual support for its program in order to satisfy the particularized showing of discrimination required by Croson. This factual support can be developed from anecdotal and statistical evidence. As is discussed in greater detail below in subparagraph 5, anecdotal evidence alone cannot be used to establish the requisite factual support for such a program.

3. Burdens of Production/Proof

As noted above, the Croson court struck down the City of Richmond's minority set-aside program because the City failed to provide an adequate evidentiary showing of past and present discrimination as was its initial burden.¹³ Since the Fourteenth Amendment only allows race-conscious programs that narrowly seek to remedy particularized discrimination, the Court held that state and local governments "must identify that discrimination . . . with some specificity before they may use race-conscious relief." The Court's rationale for judging the sufficiency of the City's factual predicate for affirmative action legislation was whether there existed a "strong basis in evidence for its [government's] conclusion that remedial action was necessary."¹⁴

The initial burden of production on the state or local governmental entity is to demonstrate a "strong basis in evidence" that its race- and gender-conscious contract program is aimed at remedying identified past or present discrimination. Merely stating a "benign" or "remedial" purpose does not constitute a "strong basis in evidence" that the remedial plan is necessary, nor does it establish a prima facie case of discrimination.

¹¹ 36 F.3d 1513 (10th Cir. 1994).

¹² Concrete Works, 36 F.3d at 1529.

¹³ Croson, 488 U.S. at 498-506.

¹⁴ Croson, 488 U.S. at 500 (quoting Wygant v. Jackson Bd. of Educ., 476 U.S. 267, 277, 106 S.Ct. 1842, 1849 (1986)).

Thus, the local government must identify the discrimination it seeks to redress and produce particularized findings of discrimination.¹⁵

A governmental entity may, for example, establish an inference of discrimination by using empirical evidence that proves a significant statistical discrepancy between the number of qualified M/WBEs, the number of M/WBE contractors actually awarded a contract by the governmental entity, or M/WBEs brought in as subcontractors by prime contractors to which a contract is awarded. The courts maintain that the quantum of evidence required for the governmental entity is to be determined on a case-by-case basis, and in the context and breadth of the M/WBE program it purports to advance.¹⁶ If the governmental body is able to do this, then the burden shifts to the challenging party to rebut the showing.¹⁷

Once the governmental entity has shown acceptable proof of a compelling interest in remedying past discrimination and illustrated that its plan is narrowly tailored to achieve this goal, the party challenging the affirmative action plan bears the ultimate burden of proving that the plan is unconstitutional.¹⁸

4. “Compelling Public Interest” Considerations

Although imposing a substantial burden, strict scrutiny is not automatically “fatal in fact.” Adarand, 515 U.S. at 237, 115 S.Ct. 2097. After all, “[t]he unhappy persistence of both the practice and the lingering effects of racial discrimination against minority groups in this country is an unfortunate reality, and government is not disqualified from acting in response to it.” Id.; Alexander, 95 F.3d at 315. In so acting, a governmental entity must demonstrate it had a compelling interest in “remedying the effects of past or present racial discrimination.” Shaw v. Hunt, 517 U.S. 899, 909, 116 S.Ct. 1894, 135 L.Ed.2d 207 (1996).

Thus, to justify a race-conscious measure, a state must “identify that discrimination, public or private, with some specificity,” Croson, 488 U.S. at 504, 109 S.Ct. 706, and must have a “strong basis in evidence for its conclusion that remedial action [is] necessary.” Id. at 500, 109 S.Ct. 706 (quoting Wygant v. Jackson Bd. of Educ., 476 U.S. 267, 277, 106 S.Ct. 1842, 90 L.Ed.2d 260 (1986) (plurality opinion)); see also Podberesky v. Kirwan, 38 F.3d 147, 153 (4th Cir.1994). As courts have noted, “there is no ‘precise mathematical formula to assess the quantum of evidence that rises to the Croson ‘strong basis in evidence’ benchmark.” Rothe Dev. Corp. v. Dep’t of Def., 545 F.3d 1023, 1049 (Fed.Cir.2008) (Rothe II) (quoting W.H. Scott Constr. Co. v. City of Jackson, 199 F.3d 206, 218 n. 11 (5th Cir.1999)).¹⁹

¹⁵ Croson, 488 U.S. at 500-01.

¹⁶ See Concrete Works, 36 F.3d 1513 (10th Cir. 1994).

¹⁷ Id.

¹⁸ Sherbrooke Turf, Inc. v. Minnesota D.O.T., 345 F.3d 964, 971 (8th Cir. 2003) (“Sherbrooke and Gross Seed have the ultimate burden of establishing that the DBE program is not narrowly tailored.”); Geyer Signal, Inc. v. Minnesota D.O.T., 2014 WL 1309092, *26 (D. Minn. 2014) (“The party challenging the constitutionality of the DBE program bears the burden of demonstrating that the government’s evidence did not support an inference of prior discrimination.”) (citing Adarand III, 228 F.3d at 1166).

¹⁹ H.B. Rowe Company, Incorporated v. W. Lyndo Tippet, 615 F.3d 233, 241 (4th Cir. 2010).

The relevant case law establishes that the compelling state interests of remedying past discrimination (specifically, the present effects of such past discrimination) and of avoiding present discrimination in the context of governmental procurement programs are well-accepted and not controversial at this point.²⁰

5. Statistical Data and Anecdotal Evidence Combine to Establish Factual Predicate

The types of evidence routinely presented to show the existence of a factual predicate include statistical and anecdotal evidence.²¹ Where gross statistical discrepancies exist, they alone may constitute *prima facie* proof of a pattern or practice of discrimination. Anecdotal evidence, such as testimony from minority or women business owners, is most useful as a supplement to strong statistical evidence, as it cannot carry the burden for the entity by itself. See *infra*.

For example, the Croson majority implicitly endorsed the value of personal accounts of discrimination, but Croson and subsequent decisions also make clear that selective anecdotal evidence about M/WBE experiences alone would not provide an ample basis in evidence to demonstrate public or private discrimination in a municipality's construction industry.²²

Thus, personal accounts of actual discrimination or the effects of discriminatory practices are admissible and effective, and anecdotal evidence of a governmental entity's institutional practices that provoke discriminatory market conditions is particularly probative. In order to carry the day, however, such evidence must be supplemented with strong statistical proof:

As we explained in Ensley Branch, “[c]ertain aspects of this inquiry are well established.” 31 F.3d at 1565. A “strong basis in evidence” cannot rest on “an amorphous claim of societal discrimination, on simple legislative assurances of good intention, or on congressional findings of discrimination in the national economy.” *Id.* (citing and applying Croson) (internal quotation marks omitted). However, a governmental entity can “justify affirmative action by demonstrating ‘gross statistical disparities’ between the proportion of minorities hired . . . and the proportion of minorities willing and able to do the work.” *Id.*

²⁰ See W.H. Scott Const. Co. v. City of Jackson, 199 F.3d 206, 217 (5th Cir. 1999) (“Combating racial discrimination is a compelling government interest.”); Croson, 488 U.S. at 492 (“It is beyond dispute that any public entity, state or federal, has a compelling interest in assuring that public dollars, drawn from the tax contributions of all citizens, do not serve to finance the evils of private prejudice.”); Adarand III, 515 U.S. at 237 (“The unhappy persistence of both the practice and the lingering effects of racial discrimination against minority groups in this country is an unfortunate reality, and government is not disqualified from acting in response to it.”).

²¹ Croson, 488 U.S. at 501.

²² Croson, 488 U.S. at 480 (noting as a weakness in the City's case that the Richmond City Council heard “no direct evidence of race-conscious discrimination on the part of the city in letting contracts or any evidence that the City's prime contractors had discriminated against minority-owned subcontractors”); see also Coral Construction Co. v. King County, 941 F.2d 910, 919 (9th Cir. 1991) (“While anecdotal evidence may suffice to prove individual claims of discrimination, rarely, if ever, can such evidence show a systematic pattern of discrimination necessary for the adoption of an affirmative action plan.”).

(citations omitted). “Anecdotal evidence may also be used to document discrimination, especially if buttressed by relevant statistical evidence.” *Id.*²³

Of note, several courts have rejected assertions by plaintiffs attacking programs that anecdotal evidence must be verified to be considered as part of a governmental entity’s evidentiary proffer.²⁴

a) *Statistical Data Generally*

In *Croson*, the court explained that an inference of discrimination may be made with empirical evidence that demonstrates “a significant statistical disparity between the number of qualified minority contractors . . . and the number of such contractors actually engaged by the locality or the locality’s prime contractors.”²⁵ A predicate to governmental action is a demonstration that gross statistical discrepancies exist between the proportion of M/WBEs awarded government contracts and the proportion of M/WBEs in the local industry “willing and able to do the work,” in order to justify its use of race-conscious contract measures.²⁶ In other words, a Disparity Study is intended to evaluate whether there is a statistically-significant disconnect—i.e., discrepancy —between the availability of and utilization of Minority- or Women-owned firms in public contracting.

In order to adequately assess statistical evidence, there must be information identifying the basic qualifications of minority (or women) contractors “willing and able to do the job” and a court must determine, based upon these qualifications, the relevant statistical pool with which to make the appropriate statistical comparisons.²⁷

b) *Availability*

Availability is a benchmark to examine whether there are any disparities between the utilization of M/WBEs and their availability in the marketplace. *Croson* and subsequent decisions provide only general guidance

²³ *Engineering Contractors*, 122 F.3d at 906-907, 925 (citing *Cone Corp. v. Hillsborough*, 908 F.2d 908, 916 (11th Cir. 1990)).

²⁴ *Associated General Contractors v. California D.O.T.*, 713 F.3d 1187, 1196-97 (9th Cir. 2013) (“AGC contends that the anecdotal evidence has little or no probative value in identifying discrimination because it is not verified. AGC cites to no controlling authority for a verification requirement. Both the Fourth and Tenth Circuits have rejected the need to verify anecdotal evidence.”) (citing *H.B. Rowe Co. v. Tippet*, 615 F.3d 233, 249 (4th Cir. 2010); *Concrete Works*, 321 F.3d at 989); *see also Kossman Contracting Co. v. City of Houston*, Case No. H-14-1203, at 58 (S.D. Texas 2016) (“Plaintiff criticizes the anecdotal evidence with which NERA supplemented its statistical analysis as not having been verified and investigated. Anecdotes are not the sole or even primary evidence of discrimination in this case. . . . One reason anecdotal evidence is valuable supplemental evidence is that it reaches what statistics cannot: a witness’ narrative of an incident told from the witness’ perspective and including the witness’ perceptions.”) (internal quotations and citations omitted).

²⁵ *Croson*, 488 U.S. at 509.

²⁶ *Ensley Branch N.A.A.C.P. v. Seibels*, 31 F.3d 1548, 1565 (11th Cir. 1994).

²⁷ *See e.g., Associated General Contractors v. California D.O.T.*, 713 F.3d at 1197-1199.

on how to measure availability, resulting in varying approaches and case-by-case analysis. One common theme, however, is the need to measure firms that are qualified to perform work in the relevant geographic market —often stated in terms of “willing and able to perform the work.”²⁸

Several courts have accepted a “list-based” approach to measuring availability, using various lists of firms located in the relevant market who have taken steps to demonstrate interest or willingness to do business with a governmental entity (such as registering, certifying, prequalifying, et. al.) or other affirmative steps to obtain a government contract (submitting bids or being awarded a contract).

For example, in H.B. Rowe Co. v. Tippet, availability was calculated using a vendor list that included: “(1) subcontractors approved by the Department to perform subcontract work on state-funded projects, (2) subcontractors that performed such work during the study period, and (3) contractors qualified to perform prime construction work on state-funded contracts.”²⁹

In Contractors Association of Eastern Pennsylvania v. City of Philadelphia,³⁰ the Third Circuit stated that available and qualified Minority-owned businesses comprise the “relevant statistical pool” for purposes of determining availability. The court in that case permitted availability to be measured using a local list of the Office of Minority Opportunity containing M/WBE firms in the metropolitan statistical area (MSA), which itself was based on census data.

Also instructive is Associated General Contractors v. City of Columbus,³¹ where the court rejected the availability data proffered by the City’s consultants, instead suggesting that the City could properly have used its existing bidders list containing “all firms which have submitted bids on prime contracts” since, the court reasoned, it represented “a ready source of information regarding the identity of the firms which are qualified to provide contracting services as prime contractors.”³²

A common question in collecting and applying availability data is whether prime contractor and subcontractor data needs to be evaluated separately; the trend is to accept combined data.

NCI’s argument is that IDOT essentially abused its discretion under this regulation by failing to separate prime contractor availability from subcontractor availability. However, NCI has not identified any aspect of the regulations that requires such separation. Indeed, as the district court observed, the regulations require the local goal to be focused on overall DBE participation in the recipient’s DOT-assisted contracts. *See* 49 C.F.R. § 26.45(a)(1). It would make little sense to separate prime contractor and subcontractor availability as

²⁸ Croson, 488 U.S. at 509.

²⁹ H.B. Rowe Co., 615 F.3d at 244.

³⁰ 6 F.3d 990 (3rd Cir. 1993).

³¹ 936 F. Supp. 1363 (1996), reversed on related grounds, 172 F.3d 411 (6th Cir. 1999).

³² Associated General Contractors, 936 F. Supp. at 1389.

suggested by NCI when DBEs will also compete for prime contracts and any success will be reflected in the recipient's calculation of success in meeting the overall goal.³³

Several courts have also accepted the use of a “custom census” methodology for calculating availability. This method involves the use of Dun & Bradstreet's Hoover data as a purported complete data set of firms in the relevant geographic market to calculate or extrapolate availability.

For example, in Northern Contracting, after identifying the relevant geographic market and product market (transportation construction), the analyst “surveyed Dun & Bradstreet's *Marketplace*, which is a comprehensive database of American businesses that identifies which businesses are minority- or women-owned. Wainwright supplemented this survey with IDOT's list of DBEs in Illinois.”³⁴ In Kossman, for example, the consulting analyst “relied on data acquired from Dun & Bradstreet's Hoovers subsidiary on the total number of businesses in the defined market area. . . . Because the Dun & Bradstreet data did not adequately identify all M/WBEs, National Economic Research Associates (NERA) collected information on M/WBEs in Texas and surrounding states through lists from public and private entities, as well as prior NERA studies, and culled records for M/WBEs within the [City's] defined market area.”³⁵

c) Utilization

As with availability, there are different ways to measure utilization, but the courts have generally accepted the use of either contract award data (dollars awarded to picked firms in a contract) or payment data (dollars paid) to calculate utilization.

For example, in H.B. Rowe, the state demonstrated statistical disparity using subcontracting dollars won by minority subcontractors (that is, award data).³⁶ In Associated General Contractors v. California D.O.T., the State's Disparity Study consultants calculated the percentage of contracting dollars that were paid to DBE firms (that is, payment data).³⁷ Having calculated the rate of utilization, one can analyze if a discrepancy exists between the measured availability and measured utilization and, if so, to what extent.

³³ Northern Contracting, Inc. v. Illinois DOT, 473 F.3d at 723; *see also* Associated General Contractors v. California D.O.T., 713 F.2d at 1199 (citing Northern Contracting, 473 F.3d at ___); H.B. Rowe, 615 F.3d at 245 (court accepted combined data based on experts' explanation that prime contractors are also qualified to do subcontracting work, and often do).

³⁴ Northern Contracting, Inc., 473 F.3d at 718.

³⁵ Id. at 5; *see also* Midwest Fence Corp. v. U.S. D.O.T., 840 F.3d 932, 950 (7th Cir. 2016) (discussing and approving custom census method).

³⁶ H.B. Rowe, 615 F.3d at 241, 250-51 (“[A] state may meet its burden by relying on ‘a significant statistical disparity’ between the availability of qualified, willing, and able minority subcontractors and the utilization of such subcontractors by the governmental entity or its prime contractors.”) (citing Croson, 488 U.S. at 509).

³⁷ 713 F.2d at 1191-1193. In Kossman v. City of Houston, NERA used both “award amounts” and “paid amounts” to determine utilization. Id. at 3, n. 10. The court, in approving the statistical proffer, looked only at the award amounts to “simplify matters.” Id.

In Cone Corp. v. Hillsborough County, the following utilization statistics were developed and presented to justify an MBE program:

The County documented the disparity between the percentage of MBE contractors in the area and the percentage of contracts awarded to those MBE contractors. Hillsborough County determined that the percentage of County construction dollars going to MBE contractors compared to the total percentage of County construction dollars spent. . . . The data extracted from the studies indicates that while ten percent of the businesses and twelve percent of the contractors in the County were minorities, only 7.89% of the County purchase orders, 1.22% of the County purchase dollars, 6.3% of the awarded bids, and 6.5% of the awarded dollars went to minorities. The statistical disparities between the total percentage of minorities involved in construction and the work going to minorities, therefore, varied from approximately four to ten percent, with a glaring 10.78% disparity between the percentage of minority contractors in the County and the percentage of County construction dollars awarded to minorities. Such a disparity clearly constitutes a prima facie case of discrimination indicating that the racial classification in the County plan were necessary.³⁸

As with availability, supra, some courts have deemed it appropriate to collect and analyze combined prime and subcontractor data when evaluating utilization.³⁹

d) *Statistical Significance Measurements*

Once the statistical data has been collected and preliminarily assessed, further analysis must be done to evaluate whether any gap or discrepancy identified is “statistically significant.” Reviewing courts have approved the use of Disparity Indices and Standard Deviations for this purpose.

One way to demonstrate the under-utilization of M/WBEs in a particular area is to employ a statistical device known as a Disparity Index.⁴⁰ The use of such an index was explained, and cited approvingly, in H.B. Rowe.⁴¹ In that case, after noting the increasing use of Disparity Indices, the court explained that the State (through a consulting firm) calculated an index for each relevant racial or gender group covered by the DBE program, and further, conducted a standard deviation analysis on each of those indices:

MGT grounded its analysis in the “disparity index,” which measures the participation of a given racial, ethnic, or gender group engaged in subcontracting. To calculate a disparity index, MGT divided the percentage of total subcontracting dollars that a particular group won by the percent that group represents in the available labor pool, and multiplied the

³⁸ 908 F.3d 908, 915-16 (11th Cir. 1990).

³⁹ Kossmann, at 58 (“Separately considering prime contractors and subcontractors is not only unnecessary but may be misleading. The anecdotal evidence indicates that construction firms had served, on different contracts, as both.”).

⁴⁰ See Engineering Contractors, 122 F.3d at 914 (“The utility of disparity indices or similar measures to examine the utilization of minorities or women in a particular industry has been recognized by a number of federal circuit courts.”).

⁴¹ See H.B. Rowe, 615 F.3d at 243-44.

result by 100. The closer the resulting index is to 100, the greater that group's participation. For example, if African American subcontractors represented 30 percent of the available labor pool and won 30 percent of the subcontracting dollars, the disparity index would be 100 or full participation. Similarly, if African American subcontractors represented 30 percent of the available labor pool and won 15 percent of the subcontracting dollars, the disparity index would be 50 or half participation.

After Croson, a number of our sister circuits have recognized the utility of the disparity index in determining statistical disparities in the utilization of minority- and women-owned businesses.⁴²

In H.B. Rowe, the resulting calculations “demonstrated marked underutilization of [] African American and Native American subcontractors,” according to the court.⁴³ “Marked underutilization,” as used by the court, is another way of saying that the disparities identified were “statistically significant.”

A Standard Deviation Analysis, on the other hand, measures the probability that a result is a random deviation from the predicted result – and the more standard deviations, the lower the probability the result is a random one. Social scientists consider a finding of two standard deviations significant, meaning that there is about one chance in 20 that the explanation for the deviation could be random, so the deviation must be accounted for by some factor (i.e., it is not random).

e) *Regression Analyses*

In conducting its statistical analysis of purchasing by Palm Beach County, G&S will also be employing a regression analysis, which essentially seeks to control for numerous factors other than race or gender classification, e.g., firm size, experience level, which may be causing or contributing to any discrepancy identified. This aspect of the G&S methodology likewise has the support of several courts as a current “best practice” for procurement studies.

For example, after the Fourth Circuit in H.B. Rowe noted the statistical significance of certain quantitative analyses showing two standard deviations or a ratio higher than .80, it addressed the value of a regression analysis as a further evaluative tool. Specifically, in discussing the evidence offered by the State, the court favorably noted:

To corroborate the disparity data, MGT conducted a regression analysis studying the influence of certain company and business characteristics – with a particular focus on owner race and gender – on a firm's gross revenues. MGT obtained the data from a telephone survey of firms that conducted or attempted to conduct business with the Department. The survey pool consisted of a random sample of 647 such firms; of this group, 627 participated in the survey.

⁴² Id. at 243-244 (citations omitted); see also Engineering Contractors, 122 F.3d at 914 (same).

⁴³ H.B. Rowe, 615 F.3d at 243-44.

MGT used the firms' gross revenues as the dependent variable in the regression analysis to test the effect of other variables, including company age and number of full-time employees, and the owners' years of experience, level of education, race, ethnicity, and gender. The analysis revealed that minority and women ownership universally had a negative effect on revenue. African American ownership of a firm had the largest negative effect on that firm's gross revenue of all the independent variables included in the regression model. These findings led MGT to conclude that "for African Americans, in particular, the disparity in firm revenue was not due to capacity-related or managerial characteristics alone."⁴⁴

In Kossman v. City of Houston, the key feature of the supporting study was an analysis addressing business formation, earnings, and capital markets.⁴⁵ Using both statistical and anecdotal evidence, the Study ultimately concluded that "business discrimination against M/WBEs existed in the geographic and industry markets for [the City's] awarding of construction contracts":

[W]e conclude that there is strong evidence of large, adverse, and frequently statistically significant disparities between minority and female participation in business enterprise activity in [Defendant's] relevant market area and the actual current availability of those businesses. We further conclude that these disparities cannot be explained solely, or even primarily, by difference between M/WBE and non-M/WBE business populations in factors untainted by discrimination, and that these differences therefore give rise to a strong inference of the continued presence of discrimination in [Defendant's] market area. There is also strong anecdotal evidence of continuing barriers to the full and fair participation of M/WBEs on [Defendant] contracts and subcontracts, despite the implementation of the M/W/SBE Program, and in the wider Houston construction economy. Remedial efforts remain necessary to ensure that Houston does not function as a passive participant in discrimination.⁴⁶

6. Requirement for a Narrowly Tailored Remedy

Under the Croson framework, any race-conscious plan or remedy must also be narrowly tailored to ameliorate the effects of past discrimination on (and only on) the protected groups identified as significantly underutilized in the Study.⁴⁷ "Generally, while 'goals' are permissible, unyielding preferential 'quotas' will normally doom an affirmative action plan."⁴⁸

The Eleventh Circuit addressed the parameters of this requirement in Engineering Contractors:

⁴⁴ Id. at 245-46; 250 (emphasis added).

⁴⁵ Id. at pp. 2-10.

⁴⁶ Kossman, at p. 11.

⁴⁷ See Michigan Road Builders Ass'n v. Milliken, 834 F.2d 583, 589-90 (6th Cir. 1987).

⁴⁸ Virdi v. DeKalb County School District, 135 Fed. Appx. 262; (11th Cir. 2005) see also Sherbrooke Turf, 345 F.3d at 972 (8th Cir. 2003)(citing Croson, 488 U.S. at 496).

In this circuit, we have identified four factors that should be taken into account when evaluating whether a race- or ethnicity-conscious affirmative action program is narrowly tailored:

In making this evaluation, we consider: (1) the necessity for the relief and the efficacy of alternative remedies; (2) the flexibility and duration of the relief, including the availability of waiver provisions; (3) the relationship of numerical goals to the relevant labor market; and (4) the impact of the relief on the rights of innocent third parties. The preceding four factors are not a mechanical formula for determining whether an affirmative action program is narrowly tailored, but they do provide a useful analytical structure.⁴⁹

Similar guideposts are provided in several post-Croson cases addressing or evaluating efforts to meet the “narrowly tailored” prong – which we simply list for ease of reference:

- Relief is limited to minority groups for which there is identified discrimination;
- Remedies are limited to redressing the discrimination within the boundaries of the enacting jurisdiction;
- The goals of the programs should be flexible and provide waiver provisions;
- Race and/or gender-neutral measures should be considered to the extent reasonably possible; and
- The program should include provisions or mechanisms for periodic review and sunset.⁵⁰

Inherent in the above discussion is the notion that M/WBE programs and remedies must maintain flexibility with regard to local conditions in the public and private sectors. Courts have suggested project-by-project goal setting and waiver provisions as means of ensuring fairness to all vendors. Both of these were features of the program ultimately upheld by the Eleventh Circuit in Cone v. Hillsborough County:

The GSC [Goal Setting Committee] sets goals for each individual project based on the number of *qualified* MBE subcontractors available for each subcontractable area. If there are not at least three qualified MBE subcontractors available for the subcontractable area, no goal is set in that area. In areas where goals are set, no goal may ever exceed fifty percent MBE participation. At any time prior to advertisement of the project, the goals can be waived. A low bidder who does not meet the plan goals still can obtain a contract simply by demonstrating a good-faith effort to find MBE contractors. Even absent such good faith efforts, the contractor may still receive the contract if the next lowest bid is either \$100,000 or fifteen percent higher than the non-responsive bidder.⁵¹

⁴⁹ 122 F.3d at 927 (citation omitted); *see also Croson*, 488 U.S. at 507-08; Sherbrooke Turf, 345 F.3d at 972 (“Narrow tailoring does not require exhaustion of every conceivable race-neutral alternative, but it does require serious, good faith consideration of workable race-neutral alternatives.”); Adarand VII, at 1177.

⁵⁰ Sherbrooke Turf, 345 F.3d at 971 (“In determining whether a race-conscious remedy is narrowly tailored, we look to factors such as the efficacy of alternative remedies, the flexibility and duration of the race-conscious remedy, the relationship of the numerical goals to the relevant labor market, and the impact of the remedy on third parties.”).

⁵¹ 908 F.2d at 917 (italics in original).

Finally, the “review” or “sunset” provisions noted above are strongly suggested components for an M/WBE program to guarantee that remedies do not out-live their intended remedial purpose. Relying on precedent from the Eleventh Circuit and other judicial circuits, the district court in Hershell Gill v. Miami-Dade County⁵² reasoned:

In Danskine, for example, the Eleventh Circuit held that the failure to adjust a participation goal to comport with changes in the marketplace may render a program inflexible. See Danskine, 253 F.3d at 1300 (“Although the County asserts that the 36% goal is flexible, there is no evidence that it has ever altered that goal — even once — in the 17 years that the plan has been in operation.”). . . . As the Seventh Circuit has put it, a local government may not “continue [a race-conscious] remedy in force indefinitely, with no effort to determine whether, the remedial purpose attained, continued enforcement of the remedy would be a gratuitous discrimination against nonminority persons.” Builders Ass’n of Greater Chicago v. County of Cook, 256 F.3d 642, 647 (7th Cir.2001).⁵³

In H.B. Rowe, the Fourth Circuit also specifically noted with approval the mandatory review and sunset provisions included in the North Carolina statute at issue in that case.⁵⁴

B. Conclusion

As shown, disparity studies are essentially a product of case law, and the developing case law continues to refine methodological considerations and further define current best practices. The Croson decision, handed down more than thirty-five years ago, continues to guide the constitutional analyses of M/WBE programs more generally, with significant clarifications/adjustments by the Supreme Court and the federal Circuit Courts of Appeal in its wake. Of particular note, the court in Kossman (cited above) included in its opinion a lengthy legal overview of what it dubbed “Croson’s Continuing Significance.” In this section of its decision, the court opined about why a statistical analysis like that at issue in that case was necessary and proper under the Equal Protection scheme established by Croson and refined by its (continuing) progeny.⁵⁵

⁵² 333 F.Supp.2d 1305 (S.D. Fla. 2004).

⁵³ Id. at 1332.

⁵⁴ 615 F.3d at 239.

⁵⁵ Kossman, at pp. 34-49, 53-62.

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APPENDIX C

DATA ASSESSMENT REPORT

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX C: DATA ASSESSMENT REPORT

PALM BEACH COUNTY, FLORIDA
2025 DISPARITY STUDY
DATA ASSESSMENT REPORT

Griffin & Strong (“G&S”) conducted a virtual data assessment meeting on August 14, 2024, along with seven follow up data assessment meetings with individual departments (FDO, Engineering and Public Works, Airports, Water Utilities, ERM, Palm Tran, and Purchasing) from August 27, 2024, to September 12, 2024. This report summarizes the meetings and sets forth action items and preliminary questions to be answered. It is necessary to issue a data assessment report prior to completing the data collection plan to confirm that GSPC has the correct understanding of how and where data is kept by Palm Beach County (herein referred to as the “County”). All data requests will be submitted to the respective County departments, and all data will be submitted to the County through Deirdre Kyle, Small Business Development Specialist III, Office of Equal Business Opportunity.

There were over 40 members from Palm Beach County’s staff during the initial data assessment meeting on August 14, 2024. The 7 individual/follow- up data assessment meetings invited the following attendees:

Name	Title
Michele Clark Jenkins	Director of Methodology & Research, Griffin & Strong
Hema Dass-Narinesingh	Senior Manager, Griffin & Strong
Dr. Vince Eagan	Principle Investigator, Griffin & Strong
David Maher	Legal Partner, Griffin & Strong
Hanna Rowell	Deputy Project Manager, Griffin & Strong
Kalvin Walden	Data Analyst, Griffin & Strong
Tonya Davis Johnson	Director, Office of Equal Business Opportunity, Palm Beach County
Deirdre Kyle	Small Business Development Specialist III, Office of Equal Business Opportunity, Palm Beach County
Isami Ayala-Collazo	Director, Facilities Development & Operations, Palm Beach County
David Ricks	County Engineer, Engineering and Public Works, Palm Beach County
Kenny Rampersad	Director of Administrative Services, Engineering and Public Works, Palm Beach County
Joanne Keller	Deputy County Engineer, Engineering and Public Works, Palm Beach County
Donna Lewis	Office Manager, Engineering and Public Works, Palm Beach County
Denise Darata	Secretary, Engineering and Public Works, Palm Beach County
Danny Ramlalsingh	Fiscal Manager, Engineering and Public Works, Palm Beach County
Laura Beebe	Director, Airports, Palm Beach County

Anthony Gregory	Compliance Manager, Airports, Palm Beach County
Cynthia Portnoy	Director of Planning & Community Affairs, Airports, Palm Beach County
Michael Stahl	Deputy Director, Environmental Resources Management, Palm Beach County
Yamel Vasquez	Contract Manager, Environmental Resources Management, Palm Beach County
Laura Thompson	Director of Finance and Support Services, Environmental Resources Management, Palm Beach County
Gretel Sarmiento	Division Director of Business Operations & Community Outreach, Environmental Resources Management, Palm Beach County
Ali Bayat	Department Director, Water Utilities, Palm Beach County
Krystin Bernsten	Deputy Director, Water Utilities, Palm Beach County
Stephanie Marsh-Corinthian	Assistant Director, Water Utilities, Palm Beach County
Jane House	Director of Engineering, Water Utilities, Palm Beach County
Melody Thelwell	Director, Purchasing, Palm Beach County
Ivan Maldonado	Executive Director, Palm Tran, Palm Beach County
Fredlyne Johnson	Director of Administrative Services, Palm Tran, Palm Beach County

A. Scope Statement

The purpose of this project is to conduct a study to determine if there continues to be a strong basis in evidence showing that willing and able Minority-and Women-owned businesses are significantly underutilized in construction, professional services, and goods and services contracts awarded by the County and if so, the extent to which such disparities may be attributed to discrimination.

The study period for the Disparity Study has been determined as a five (5) year period from January 1, 2019, to December 31, 2023.

The contracting activity measured in the Disparity Study shall consist of the following five industry categories:

1. Construction
2. Professional Services (CCNA)
3. Professional Services (Non-CCNA)
4. Services
5. Goods/Commodities

State and Federally funded projects are treated separately from locally funded projects. Only locally funded

projects can have goals, so state and local payments and awards must be analyzed separately from the date that state funded contracts were exempted. The County will provide the date. Federally funded projects subject to the DBE program are excluded from the Study.

The County's departments participating in the Study are:

- Administration
- Airports Department
- CareerSource Palm Beach County
- Commission on Ethics
- Community Revitalization
- Community Services
- Cooperative Extension Service
- County Attorney
- County Commissioners
- Court Administration
- Criminal Justice Commission
- Engineering and Public Works
- Environmental Resources Management
- Equal Business Opportunity
- Equal Opportunity
- Facilities Development & Operations
- Financial Management & Budget
- Fire/Rescue
- Housing & Economic Development
- Human Resources
- Information Systems Services
- Inspector General
- Internal Auditor
- Legislative Affairs
- Library
- Medical Examiner's Office
- Palm Beach Transportation Planning Agency
- Palm Tran
- Parks & Recreation
- PBC HIV Care Council
- Planning, Zoning & Building
- Public Affairs
- Public Health Unit
- Public Safety
- Purchasing
- Resilience
- Risk Management
- Solid Waste Authority
- Tourist Development Council
- Treasure Coast Regional Planning Council
- Water Resources Task Force

- Water Utilities
- Youth Services

B. Preliminary Purchasing Practices

- a) Contract Thresholds
 - i. Awards up to \$4,999.99
 1. Single quote or relevant pricing information, including, but not limited to, a review of the marketplace and cost / benefit analysis.
 - ii. Awards \$5,000.00-\$99,999.99
 1. Maximum of three competitive quotes
 - iii. Awards \$100,000.00 or more
 1. Posting of a competitive solicitation

C. Data Assessment

- a) General Data
 - i. The County's data is centralized and is kept in the Advantage system.
 - ii. The County utilizes NIGP codes for local projects and NAICS codes for state and federal projects.
 - iii. The procurement of goods and services is accomplished through various methods including, but not limited to, Invitations for Bid (IFB), Requests for Proposal (RFP), Requests for Quotation (RFQ), and Requests for Submittal (RFS).
 - iv. From March 2020 to October 2021, the County was under a state of emergency, and during that time, ordinance requirements were suspended.
 - v. The County has six departments that have the ability to procure which includes Purchasing and five Construction departments: Airports, Engineering and Public Works, Environmental Resources Management, Facilities Development & Operations, and Water Utilities.
 - a. All six departments operate under the same procurement ordinance, but each department procures independently.
 - b. Each of the five Construction departments have the authority to procure Construction within the limits of their assigned mission but are not authorized to procure Services and Goods. All Services and Goods are procured through Purchasing, but they are not authorized to procure Construction.
 - vi. Airports
 - a. The County has four airports. Palm Beach International is a commercial service airport. The other three are general aviation: Palm Beach County Glades Airport, Palm Beach County Park/Lantana Airport, and North Palm Beach County General Aviation Airport, also known as North County Airport.
 - b. Airport concessions are not in the scope of work.
 - c. The department does not have a prequalification list. However, since airports are considered a critical facility, a company must pass a background check and meet certain security requirements to do business.
 - d. Funding
 - i. For projects that have federal or state funding, NAICS codes are utilized. For locally funded projects, the County's NIGP codes are utilized.

- ii. These codes would not be visible in award data. For SBE or DBE projects, these codes would be included on the goal setting worksheet. The NAICS and NIGP codes are broken down by line items and are associated with the price point.
 - iii. If a project has any amount of money at all from federal funds, that project is deemed a federal project. Federal projects are subject to federal DBE regulations.
 - iv. Projects funded by the state are also subject to the DBE program as part of FDOT's Public Transportation Grant Agreement (PTGA).
- vii. Engineering and Public Works
 - a. In purchase orders, the NIGP code associated with a contract will be reflected.
 - b. The department has an in-house crew that does some minor repairs on roads.
 - c. Funding
 - i. For most projects, Engineering and Public Works is funded locally.
- viii. Environmental Resources Management (ERM)
 - a. The department has five divisions: Coastal Resources, Lakes, Estuaries, and Lagoons, Mosquito Control, Natural Areas, and Permitting and Regulation.
 - b. The department does have some authorities that many of the other departments do not have in part because of some of the specialized work ERM does.
 - c. There is not a large pool of vendors that do that type of work that ERM does.
 - i. For instance, the department has beach nourishment projects, and there is a limited amount of vendors with the capacity to dredge sand and place it on the beach.
 - ii. One of the vendors that has been used for many years shut down operations causing some challenges with recent solicitations and the ability to award a contract.
 - d. Funding
 - i. The department has a very small ad valorem footprint, or local funds, and majority of the work done is funded by external sources which could be some sort of funding agreement with a partner or grants through state and federal agencies.
 - ii. When the department receives federal or state funding, there are restrictions on the contracting done.
 - iii. Most of the construction contracts are funded by the state. If the contract is funded by the state or federally, that contract is exempt from OEBO ordinance. In these instances, there is no requirement for the prime to engage with SBE subcontractors. The data will identify which projects are federally and/or state funded.
- ix. Facilities Development & Operations (FDO)
 - a. Of the five construction departments, FDO has the broadest scope of work and are is the only construction department that has the authority to provide services to other construction departments.
 - b. There are two stadiums within the County. When the two stadiums were being developed, they were being built under developer agreements. Once the stadiums were built, sport facility use agreements came into effect which state that the County is responsible for a portion of the maintenance of the stadiums. Relationships with the stadiums are managed by FDO.
- x. Palm Tran
 - a. Palm Tran is not a construction department, so any contract involving construction would be procured through Facilities Development & Operations.
 - b. Palm Tran is a municipal transit, so they typically have to adhere to County procurement guidelines.
 - c. The department manages a few contracts that are specific to their department such as an agreement with the school board to purchase bus passes. Services and goods are procured by Purchasing.
 - d. Funding

- i. Palm Tran does receive Federal Transit Administration (FTA) and Florida Department of Transportation (FDOT) grants. In such cases, the department has to follow federal procurement guidelines.
 - ii. Palm Tran typically utilizes federal funds for capital projects. They also receive funding from FDOT for operations. All other service contracts are locally funded.
 - iii. Palm Tran has a DBE goal set with the FTA based off of the value of the department's contracts – goal is currently 25%.
 - xi. Purchasing
 - a. In the current code, Purchasing procures all goods and services, up to and including the review and approval of exempt services— – exempt for competitive purchasing requirements.
 - b. The County does have a prime preference program, and some vendors may be awarded work because of the price preferences.
 - c. Funding
 - i. Majority of Purchasing's funding is local.
 - xii. Water Utilities
 - a. The department utilizes Capital Improvement Plan (CIP) software, which integrates with eCMS and Advantage so that data is regularly uploaded and reflected in all softwares.
 - b. Water Utilities' scope of work is very specialized— – especially plant work.
 - c. The department utilizes the design-build approach for project delivery in some instances.
 - d. Funding
 - i. The department mostly utilizes local funding.
 - b) Purchasing Thresholds
 - i. All departments can procure up to \$4,999.99 through a decentralized purchase order process.
 - a. Up to \$999.99
 - i. Requires one quote
 - b. \$1,000.00 to \$4,999.99
 - i. Requires three quotes
 - ii. Any purchases \$5,000.00 or greater is procured by Purchasing
 - c) Specific Data Files

It was determined in these meetings that the County has the following data:

- Solicitations (Study Period)
- Vendor List (Current)
- Purchase Orders (Study Period)
- Bids (Study Period)
- Payments (Study Period)
- Awards/Contracts (Study Period)
- P-Cards (Study Period)
- Building Permit Data (Study Period)
- CMARs (Study Period)
- Subcontractors (Study Period)
- Certifications (Current)

a) Solicitations

- A master list of solicitations can be generated as it is kept in the Vendor Self Service (VSS) System.
- For the Construction departments, there is a given set of quotes that are not posted to VSS because they get issued to a limited number of vendors. These are solicited off Purchasing CMAs which are prequalified vendors, and these solicitations are not advertised on VSS.
- For services, all prequalification goes through Purchasing.
- The Construction departments utilize annual contracts.
- For Purchasing, the notification of a solicitation includes the commodity code under which the notification was posted.
- Facilities Development & Operations
 - When soliciting a project, FDO analyzes the availability of vendors in the County's vendor registry, which is managed by Purchasing and OEBO, based on commodity codes. Vendors typically are assigned multiple codes. After this soliciting process is completed, the codes are not tracked any longer.

b) Vendor List

- The County does have an external vendor list through the VSS System, which is a module of Advantage, where vendors can register and access County solicitations for all goods and services.
 - Vendors register under NIGP codes and are instructed to only enter NIGP codes that they perform work under. However, they can select whatever commodity codes they want; when being certified by OEBO, only commodity codes that the firm has performed work under will be accepted.
- Purchasing maintains an internal vendor list.
- Both prime contractors and subcontractors must be registered with the County once they receive an award.

c) Purchase Orders (POs)

- For Services and Goods, the full amount of an award would be in the initial term of the purchase order and any subsequent terms.
- A report can be run in Advantage to view the full amount of an award over the life of a contract.
- The purchase order is more reflective of the full amount of an award.
- Construction departments can issue KPOs which are Construction-related purchase orders. In these instances, the vendor will not have a contract.
- Matching purchase orders to contracts depends on the type of solicitation process of the award.

d) Bid Tabulations

- The County does maintain records of all bid tabs for the entire Study Period.
- Each department maintains their own bid tabs.
- Vendors do not have to be registered with the County to bid.
 - It is a condition that a vendor must be registered upon award.
- Bid tabs only contain the vendor's name and bid amount.
- Airports

- Planning and Development, a division of Airports, maintains the bid tabs.
- Airports' consultants prepare the detailed bid tabs as part of their review of bids which is provided to Airports and maintained on the Airports' server. These bid tabs are kept by individual project and year.
- Bid tabs can be provided as PDFs or Excel spreadsheets.
- Environmental Resources Management
 - Bid tabs are maintained by the Contract Analyst.
 - Bid tabs are kept in both PDF and Excel format.
 - Bid tabs would have the vendor name and their unit prices proposed.
- Water Utilities
 - Information from bid tabs are uploaded into CIP for the three lowest bidders.

e) Payment Data

- Payment data is centralized and kept in Advantage.
- Payment data does contain purchase order numbers.
- The department from which a payment originates will be reflected in payments.

f) Awards/Contracts

- There are contracts for vendors awarded via a solicitation for an RFP process.
- The County may have additional contracts that require additional service agreements, maintenance, licensing, etc.
- If a vendor is awarded by a bid, then the bid serves as a contract itself.
- The contract will say the initial term along with renewals which is contingent upon an agreement between the County and the vendor.
- The County utilizes direct payables, which are not considered contracts or purchase orders. These are also captured in Advantage.
- The full amount of an award for projects that are complete are accessible to generate whereas projects that are ongoing, the best data available at the time will be given because the final value will not be available until the project is completed.
- IFBs are utilized, and the lowest responsive and responsible bidder is awarded.
- The County utilizes RFPs. Vendors are awarded RFPs based on the criteria set forth in the RFP along with a selection committee ranking proposals.
- Construction Departments
 - For the Construction departments, majority of the work is awarded via contracts. If it is a large capital project, a vendor will get a large stand-alone contract for that project.
 - For a continuing contract, the contract will have no amount, but there will be a series of work orders.
 - Vendors get a contract, and encumbrances are issued.
 - A list of contracts can be provided by each Construction department, and an Advantage report can be generated which reflects all encumbrances.
 - In general, there are three types of contracts:
 - Project-specific
 - A set award amount which may go up based on change orders
 - Contract will go on until construction is complete
 - Continuing Contracts

- A contractor is selected to do small projects up to \$7.5m per Florida statute (was \$4m until July 2023)
 - Per-unit Cost Contracts
 - Specify an estimated amount the department may use, but it is not kept
- Airports
 - Airports utilizes low-bid contracts, CCNA continuing service contracts, and CMARs.
 - The department does not solicit annual contracts but may use annual contracts that are solicited by other departments.
- Engineering and Public Works
 - The full amount of an award is reflected in Advantage.
 - There may be multiple tasks orders executed for the same project over time. Adding up each of the task orders for a project would give the total amount of the project.
 - There may be more than one vendor associated with a contract number. For example, there is a civil contract for engineering services that has multiple vendors tied to the same contract number.
 - The department manages continuing service contracts selected through the CCNA process which are awarded for up to three years and competitively bid. Also utilizes annual, or resurfacing, contracts for construction, low-bid contracts, minor construction (i.e., concrete work, minor asphalt work) contracts, and drainage repair contracts (drainage and storm water lines).
 - Drainage repair contracts and minor construction contracts are annual contracts based on capacity, and task orders are issued on these contracts.
 - Annual contracts are publicly issued. A list of items that would be used for the contract are provided to the department, and they decide who will be awarded based on who meets the department's requirements and the lowest bidder.
 - For CCNA contracts that are over \$100,000, the department must send the contract to the board for approval.
- Environmental Resources Management
 - When the department receives federal or state funding, there are restrictions on the contracting done.
 - When the department utilizes CCNAs, the work orders they issue are for contracts awarded through other departments, namely Facilities Development & Operations and Engineering and Public Works, so ERM is not the lead department on those contracts. The exception is coastal engineering CCNAs— in this instance, ERM is the lead department.
 - The department utilizes annual and project-specific contracts.
 - Annual contracts are contracts that are advertised through an IFB with an anticipated list of projects, but there is no guarantee of work when that contract is awarded. These contracts can potentially be awarded to multiple contractors.
 - For instance, the department has an annual contract for their dune restoration program. In the case of a storm that impacts the area, the department can award work quickly through a work order at a fixed rate.
 - Annual contracts are typically 1 one year with two one-year renewals and

- typically last 3 three years.
- Regarding award amounts, annual contracts have a fixed rate of the sum of the unit prices that the bidder submitted at the time of bid closing. To analyze the amount a vendor was paid for a contract, it would be reflected in the amount paid when a work order, or project-specific contract, closed.
- Facilities Development & Operations
 - When a project is completed, the full amount of an award is reflected in the contract data. For projects that are ongoing, original award amounts and change orders that have been approved can be provided.
 - Contract data can be disaggregated by project number or the prime contractor.
 - Contracts have project numbers which serve as a unique identifier in FDO, but this unique identifier is exclusively used by FDO. When payments are entered, FDO enters a note that ties back to the project number.
 - Depending on the project scope, multiple vendors may be assigned the same project number. However, each vendor will be assigned its own contract number.
 - FDO issues annual contracts which have five5-year terms.
 - FDO publishes a solicitation for an open annual contract, allowing any interested party to apply. Once awarded, the contract is presented to the board for approval and implementation. Now when the department needs work to be done, that work will be published to those that are already under contract.
 - Any award over \$100,00 will also be open to other companies that don't already have a contract implemented. These vendors would just have to submit all required documents ten days prior to the bid closing.
 - Awards under \$100,000 are 'sheltered' and only published to those firms that have contracts in place and meet the API.
 - In the instance that there are multiple firms under an annual contract and the award is less than \$100,000, the award would be published to the SBE firms. The lowest responsive and responsible bidder is awarded.
 - FDO utilizes time-and-materials contracts, which are bid through the Purchasing department. Depending on how the solicitation is structured, one or multiple companies may be awarded the contract
 - FDO manages maintenance contracts (i.e., a generator breaks down and the awarded vendor can be called to come and bill for services).
 - FDO utilizes continuing contracts and project-specific contracts
 - Continuing contracts are used in accordance with Florida statutory provisions. These contracts allow FDO to engage multiple firms (FDO typically contracts with three) to perform design and construction work. Assignments are not made on a rotational basis; instead, FDO seeks to balance the overall workload among the firms.
 - Per Florida statute, any project under \$7.5 million, the project is assigned to these firms under continuing contracts.
 - These contracts are five5-year terms.
 - Project-specific contracts are instances where the department procures

the contract for a given project.

- Palm Tran
 - The department employs a variety of procurement methods to acquire services and goods. These methods include RFPs, RFQs, and IFBs.
 - The department also utilizes annual contracts which often include options for renewal— – some contracts are structured for three or five years, others set for an initial three-year term with options for two additional renewals.
- Purchasing
 - Purchasing does utilize term contracts, which are the same as what some of the other departments refer to as continuing contracts.
 - Typically, there is an initial term of one year with four one-year renewals.
- Water Utilities
 - Water Utilities procures construction services and, as the third-largest utility in Florida, manages water, wastewater, and reclaimed water systems.
 - The department procures CCNA contracts for capital projects.
 - The department does manage continuing, or annual, contracts.
 - No actual value of work at time of award, but work orders can be issued to the awarded vendor, and they follow the prices in the original bid.
 - Which vendors under contract are given a project is dependent on workload.

g) P-Cards (excluded from the Study)

- P-card program is currently facilitated through the Clerk and is used primarily for travel.
- All the P-card data is housed with Finance.

h) Building Permit Data

- The Planning, Zoning, and Building department maintains the building permit data. Reports will be produced by the IT department.

i) CMAR/JV

- The County does utilize CMARs— – specifically Airports and Facilities Development & Operations. Environmental Resource Management and Water Utilities do not use CMARs
 - Within payment data, only payments to the CMAR would be reflected.
- The County does not utilize JVs.

j) Subcontractors

- All subcontractor payments, both SMWBEs and non-SMWBEs, are tracked in the Electronic Construction Management System (eCMS) and OEBO Admin system.
- Schedule 4's are where subcontractors are listed including those that were solicited.
- Subcontractors must be registered with the County once they have received an offer to work on a project.
- There rarely are subcontractors for Services and Goods.

k) Certifications

- The County does have a certification program which is managed by the Office of Equal Business Opportunity. It is domicile-based, so a business must be located in Palm

- Beach County to be certified with the County.
- The County has an interlocal agreement with the City of West Palm Beach and Palm Beach County School District and will accept certifications from these two agencies. However, it is not a reciprocal certification.
 - For certain contracts, the County will use certifications from the State of Florida but do not have an agreement with them.



APPENDIX D

RELEVANT GEOGRAPHIC MARKET AREA ANALYSIS

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX D: RELEVANT GEOGRAPHIC MARKET AREA ANALYSIS

The tables in Appendix D (Tables D-1 through D-5) detail the dollar value of Palm Beach County's prime payments for both local and state spend but excluding federal contracts subject to DBE requirements. These payments are broken down into the five Industry Categories. The top counties are arranged from the highest dollar value to the lowest dollar value, first within the Relevant Geographic Market Area, then within the rest of the MSA⁵⁶, then within the CSA⁵⁷, then within the State of Florida, and finally outside the State of Florida.

In the following tables, spending is categorized into five Industry Categories, and in each Category the counties are listed in descending order of dollar value starting with the County, then the rest of the MSA, CSA, State of Florida, and other states. The 'Percent' column indicates the percentage of total prime spending in each county. The 'Cumulative Percent' column displays the cumulative spending percentage, including that county and all those listed above it. Counties within the Relevant Geographic Market Area are highlighted in blue, and the counties highlighted in tan make up the MSA and the CSA.

⁵⁶ The Miami–Fort Lauderdale–West Palm Beach Metropolitan Statistical Area (MSA) is comprised of: Palm Beach County, Florida; Miami-Dade County, Florida; and Broward County, Florida.

⁵⁷ The Miami-Port Saint Lucie-Fort Lauderdale Combined Statistical Areas (CSA) is comprised of: St. Lucie County, Florida; Martin County, Florida; Indian River County, Florida; Monroe County, Florida; and Okeechobee County, Florida.

**Table D-1: Prime Construction by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Market Type	County	State	Total Amount	Percent	Cumulative Percent
PALM BEACH COUNTY	PALM BEACH COUNTY	FL	\$ 426,708,797.49	88.93%	88.93%
MSA	BROWARD COUNTY	FL	\$ 22,595,173.80	4.71%	93.64%
MSA	MIAMI-DADE COUNTY	FL	\$ 12,760,962.14	2.66%	96.30%
CSA	ST. LUCIE COUNTY	FL	\$ 3,666,001.13	0.76%	97.06%
CSA	MARTIN COUNTY	FL	\$ 934,907.69	0.19%	97.26%
REST OF FL	SARASOTA COUNTY	FL	\$ 1,396,654.05	0.29%	97.55%
REST OF FL	HILLSBOROUGH COUNTY	FL	\$ 1,148,805.21	0.24%	97.79%
REST OF FL	PASCO COUNTY	FL	\$ 611,494.77	0.13%	97.92%
REST OF FL	SEMINOLE COUNTY	FL	\$ 570,786.07	0.12%	98.04%
REST OF FL	HERNANDO COUNTY	FL	\$ 469,116.00	0.10%	98.13%
REST OF FL	ORANGE COUNTY	FL	\$ 285,037.72	0.06%	98.19%
REST OF FL	BREVARD COUNTY	FL	\$ 268,092.00	0.06%	98.25%
REST OF FL	PINELLAS COUNTY	FL	\$ 193,627.88	0.04%	98.29%
REST OF FL	HENDRY COUNTY	FL	\$ 158,811.62	0.03%	98.32%
REST OF FL	DUVAL COUNTY	FL	\$ 129,471.46	0.03%	98.35%
REST OF FL	LEON COUNTY	FL	\$ 67,505.46	0.01%	98.36%
REST OF FL	LEE COUNTY	FL	\$ 36,930.00	0.01%	98.37%
REST OF FL	CHARLOTTE COUNTY	FL	\$ 26,712.70	0.01%	98.38%
REST OF FL	VOLUSIA COUNTY	FL	\$ 4,995.00	0.00%	98.38%
REST OF FL	CITRUS COUNTY	FL	\$ 3,636.00	0.00%	98.38%
REST OF FL	FLAGLER COUNTY	FL	\$ 2,590.00	0.00%	98.38%
REST OF USA	HAYS COUNTY	TX	\$ 5,177,891.52	1.08%	99.46%
REST OF USA	MARION COUNTY	IN	\$ 713,635.99	0.15%	99.61%
REST OF USA	SOMERSET COUNTY	NJ	\$ 412,368.13	0.09%	99.69%
REST OF USA	LOS ANGELES COUNTY	CA	\$ 304,233.00	0.06%	99.76%
REST OF USA	EAST BATON ROUGE PARISH	LA	\$ 270,150.45	0.06%	99.81%
REST OF USA	HAMILTON COUNTY	IN	\$ 214,597.33	0.04%	99.86%
REST OF USA	SCOTT COUNTY	MN	\$ 187,554.50	0.04%	99.90%
REST OF USA	MACOMB COUNTY	MI	\$ 75,305.02	0.02%	99.91%
REST OF USA	HARRIS COUNTY	TX	\$ 70,938.75	0.01%	99.93%
REST OF USA	CUYAHOGA COUNTY	OH	\$ 56,754.41	0.01%	99.94%
REST OF USA	YAKIMA COUNTY	WA	\$ 56,000.00	0.01%	99.95%
REST OF USA	HILLSBOROUGH COUNTY	NH	\$ 54,485.00	0.01%	99.96%
REST OF USA	DALLAS COUNTY	TX	\$ 49,285.00	0.01%	99.97%
REST OF USA	KAUFMAN COUNTY	TX	\$ 38,238.45	0.01%	99.98%
REST OF USA	RIVERSIDE COUNTY	CA	\$ 35,400.00	0.01%	99.99%
REST OF USA	JEFFERSON COUNTY	KY	\$ 19,959.87	0.00%	99.99%
REST OF USA	FULTON COUNTY	GA	\$ 10,515.00	0.00%	99.99%
REST OF USA	COOK COUNTY	IL	\$ 8,824.25	0.00%	100.00%
REST OF USA	DURHAM COUNTY	NC	\$ 5,850.00	0.00%	100.00%
REST OF USA	WASHINGTON COUNTY	UT	\$ 5,142.00	0.00%	100.00%
REST OF USA	LUZERNE COUNTY	PA	\$ 3,729.70	0.00%	100.00%
REST OF USA	BAKER COUNTY	OR	\$ 3,041.00	0.00%	100.00%
REST OF USA	PIERCE COUNTY	WA	\$ 2,636.44	0.00%	100.00%
REST OF USA	JEFFERSON COUNTY	AL	\$ 889.21	0.00%	100.00%
REST OF USA	JOHNSON COUNTY	KS	\$ 400.00	0.00%	100.00%

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**Table D-2: Prime Professional Services (CCNA) by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Market Type	County	State	Total Amount	Percent	Cumulative Percent
PALM BEACH COUNTY	PALM BEACH COUNTY	FL	\$ 89,276,360.99	89.63%	89.63%
MSA	BROWARD COUNTY	FL	\$ 2,748,189.93	2.76%	92.39%
MSA	MIAMI-DADE COUNTY	FL	\$ 1,125,394.48	1.13%	93.52%
CSA	MARTIN COUNTY	FL	\$ 68,760.00	0.07%	93.59%
CSA	ST. LUCIE COUNTY	FL	\$ 5,327.29	0.01%	93.59%
REST OF FL	PASCO COUNTY	FL	\$ 1,213,199.44	1.22%	94.81%
REST OF FL	ORANGE COUNTY	FL	\$ 1,114,220.91	1.12%	95.93%
REST OF FL	BREVARD COUNTY	FL	\$ 863,804.25	0.87%	96.80%
REST OF FL	HILLSBOROUGH COUNTY	FL	\$ 670,793.87	0.67%	97.47%
REST OF FL	POLK COUNTY	FL	\$ 421,776.59	0.42%	97.90%
REST OF FL	FLAGLER COUNTY	FL	\$ 224,412.50	0.23%	98.12%
REST OF FL	DUVAL COUNTY	FL	\$ 45,086.50	0.05%	98.17%
REST OF FL	ALACHUA COUNTY	FL	\$ 6,160.00	0.01%	98.17%
REST OF FL	HERNANDO COUNTY	FL	\$ 5,200.00	0.01%	98.18%
REST OF FL	PINELLAS COUNTY	FL	\$ -	0.00%	98.18%
REST OF USA	DOUGLAS COUNTY	CO	\$ 565,027.59	0.57%	98.74%
REST OF USA	DANE COUNTY	WI	\$ 363,657.92	0.37%	99.11%
REST OF USA	MULTNOMAH COUNTY	OR	\$ 262,175.35	0.26%	99.37%
REST OF USA	HAMILTON COUNTY	OH	\$ 260,038.22	0.26%	99.63%
REST OF USA	MONROE COUNTY	NY	\$ 173,230.75	0.17%	99.81%
REST OF USA	MONMOUTH COUNTY	NJ	\$ 88,018.31	0.09%	99.90%
REST OF USA	COOK COUNTY	IL	\$ 55,220.57	0.06%	99.95%
REST OF USA	ORANGE COUNTY	CA	\$ 24,049.00	0.02%	99.98%
REST OF USA	MIDDLESEX COUNTY	MA	\$ 11,482.44	0.01%	99.99%
REST OF USA	MIDDLESEX COUNTY	CT	\$ 7,090.00	0.01%	99.99%
REST OF USA	CHESTER COUNTY	PA	\$ 5,475.00	0.01%	100.00%

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Table D-3: Prime Professional Services (Non-CCNA) by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Market Type	County	State	Total Amount	Percent	Cumulative Percent
PALM BEACH COUNTY	PALM BEACH COUNTY	FL	\$ 82,109,266.95	42.64%	42.64%
MSA	MIAMI-DADE COUNTY	FL	\$ 30,793,730.01	15.99%	58.63%
MSA	BROWARD COUNTY	FL	\$ 10,836,791.17	5.63%	64.26%
CSA	MARTIN COUNTY	FL	\$ 97,040.96	0.05%	64.31%
CSA	ST. LUCIE COUNTY	FL	\$ 4,125.00	0.00%	64.31%
REST OF FL	HILLSBOROUGH COUNTY	FL	\$ 28,259,930.62	14.68%	78.99%
REST OF FL	ORANGE COUNTY	FL	\$ 1,291,526.25	0.67%	79.66%
REST OF FL	LEON COUNTY	FL	\$ 1,085,796.22	0.56%	80.22%
REST OF FL	LEE COUNTY	FL	\$ 690,589.30	0.36%	80.58%
REST OF FL	BREVARD COUNTY	FL	\$ 134,924.20	0.07%	80.65%
REST OF FL	DUVAL COUNTY	FL	\$ 84,225.40	0.04%	80.69%
REST OF FL	ST. JOHNS COUNTY	FL	\$ 62,412.00	0.03%	80.73%
REST OF FL	OSCEOLA COUNTY	FL	\$ 27,626.02	0.01%	80.74%
REST OF FL	PINELLAS COUNTY	FL	\$ 25,607.00	0.01%	80.75%
REST OF FL	SEMINOLE COUNTY	FL	\$ 11,385.00	0.01%	80.76%
REST OF FL	CHARLOTTE COUNTY	FL	\$ 10,532.55	0.01%	80.76%
REST OF FL	HERNANDO COUNTY	FL	\$ 7,400.00	0.00%	80.77%
REST OF FL	VOLUSIA COUNTY	FL	\$ 3,472.00	0.00%	80.77%
REST OF FL	PASCO COUNTY	FL	\$ 3,429.21	0.00%	80.77%
REST OF FL	SARASOTA COUNTY	FL	\$ 3,157.25	0.00%	80.77%
REST OF FL	ALACHUA COUNTY	FL	\$ 2,301.84	0.00%	80.77%
REST OF USA	MIDDLESEX COUNTY	NJ	\$ 16,172,574.54	8.40%	89.17%
REST OF USA	GWINNETT COUNTY	GA	\$ 6,045,132.41	3.14%	92.31%
REST OF USA	MARION COUNTY	IN	\$ 1,441,376.16	0.75%	93.06%
REST OF USA	COOK COUNTY	IL	\$ 1,034,029.63	0.54%	93.60%
REST OF USA	SMITH COUNTY	TX	\$ 1,000,666.61	0.52%	94.12%
REST OF USA	HARRIS COUNTY	TX	\$ 829,412.67	0.43%	94.55%
REST OF USA	COBB COUNTY	GA	\$ 825,116.88	0.43%	94.98%
REST OF USA	FREDERICK COUNTY	MD	\$ 806,627.00	0.42%	95.40%
REST OF USA	BURLINGTON COUNTY	NJ	\$ 722,789.03	0.38%	95.77%
REST OF USA	NEW YORK COUNTY	NY	\$ 632,015.65	0.33%	96.10%
REST OF USA	FREEBORN COUNTY	MN	\$ 616,291.51	0.32%	96.42%
REST OF USA	CUYAHOGA COUNTY	OH	\$ 577,673.98	0.30%	96.72%
REST OF USA	SHELBY COUNTY	AL	\$ 555,728.86	0.29%	97.01%
REST OF USA	FULTON COUNTY	GA	\$ 464,491.98	0.24%	97.25%
REST OF USA	ORANGE COUNTY	CA	\$ 418,233.79	0.22%	97.47%
REST OF USA	LOS ANGELES COUNTY	CA	\$ 290,393.00	0.15%	97.62%
REST OF USA	DALLAS COUNTY	TX	\$ 263,110.26	0.14%	97.75%
REST OF USA	CENTRE COUNTY	PA	\$ 227,644.24	0.12%	97.87%
REST OF USA	BALDWIN COUNTY	AL	\$ 216,617.43	0.11%	97.98%

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Table D-3 (cont.): Prime Professional Services (Non-CCNA) by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	ERIE COUNTY	NY	\$ 181,999.97	0.09%	98.08%
REST OF USA	JEFFERSON COUNTY	CO	\$ 180,245.00	0.09%	98.17%
REST OF USA	DISTRICT OF COLUMBIA	DC	\$ 175,830.86	0.09%	98.26%
REST OF USA	SAN FRANCISCO COUNT	CA	\$ 162,420.00	0.08%	98.35%
REST OF USA	MONTGOMERY COUNT	MD	\$ 160,734.01	0.08%	98.43%
REST OF USA	MIDDLESEX COUNTY	MA	\$ 157,074.46	0.08%	98.51%
REST OF USA	DAVIDSON COUNTY	TN	\$ 152,250.00	0.08%	98.59%
REST OF USA	STEARNS COUNTY	MN	\$ 136,185.57	0.07%	98.66%
REST OF USA	MECKLENBURG COUNT	NC	\$ 127,936.25	0.07%	98.73%
REST OF USA	HAMILTON COUNTY	OH	\$ 115,086.66	0.06%	98.79%
REST OF USA	SAN DIEGO COUNTY	CA	\$ 114,726.06	0.06%	98.85%
REST OF USA	PLYMOUTH COUNTY	MA	\$ 110,455.92	0.06%	98.91%
REST OF USA	HENNEPIN COUNTY	MN	\$ 103,691.45	0.05%	98.96%
REST OF USA	CLARK COUNTY	NV	\$ 97,724.95	0.05%	99.01%
REST OF USA	KNOX COUNTY	TN	\$ 90,000.00	0.05%	99.06%
REST OF USA	FAIRFAX COUNTY	VA	\$ 84,763.75	0.04%	99.10%
REST OF USA	MILWAUKEE COUNTY	WI	\$ 83,440.00	0.04%	99.14%
REST OF USA	MONTGOMERY COUNT	PA	\$ 83,109.84	0.04%	99.19%
REST OF USA	UTAH COUNTY	UT	\$ 81,205.65	0.04%	99.23%
REST OF USA	FAIRFIELD COUNTY	CT	\$ 80,100.00	0.04%	99.27%
REST OF USA	MONTGOMERY COUNT	TX	\$ 78,579.61	0.04%	99.31%
REST OF USA	COOS COUNTY	NH	\$ 78,000.00	0.04%	99.35%
REST OF USA	CHESTER COUNTY	PA	\$ 77,772.43	0.04%	99.39%
REST OF USA	WAKE COUNTY	NC	\$ 73,505.00	0.04%	99.43%
REST OF USA	KING COUNTY	WA	\$ 69,480.00	0.04%	99.47%
REST OF USA	ALAMEDA COUNTY	CA	\$ 67,599.89	0.04%	99.50%
REST OF USA	WASHTENAW COUNTY	MI	\$ 54,000.00	0.03%	99.53%
REST OF USA	WINDSOR COUNTY	VT	\$ 53,615.00	0.03%	99.56%
REST OF USA	MERCER COUNTY	NJ	\$ 52,267.80	0.03%	99.59%
REST OF USA	DEKALB COUNTY	GA	\$ 50,000.00	0.03%	99.61%
REST OF USA	HILLSBOROUGH COUNT	NH	\$ 50,000.00	0.03%	99.64%
REST OF USA	WAYNE COUNTY	MI	\$ 46,321.00	0.02%	99.66%
REST OF USA	GREENVILLE COUNTY	SC	\$ 41,029.41	0.02%	99.68%
REST OF USA	MORRIS COUNTY	NJ	\$ 30,000.00	0.02%	99.70%
REST OF USA	GUILFORD COUNTY	NC	\$ 29,969.00	0.02%	99.71%
REST OF USA	SALT LAKE COUNTY	UT	\$ 29,548.05	0.02%	99.73%
REST OF USA	SUFFOLK COUNTY	NY	\$ 28,281.14	0.01%	99.74%
REST OF USA	DOUGLAS COUNTY	CO	\$ 24,705.47	0.01%	99.76%
REST OF USA	KENT COUNTY	MI	\$ 23,760.00	0.01%	99.77%
REST OF USA	HAMPSHIRE COUNTY	MA	\$ 23,000.00	0.01%	99.78%

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Table D-3 (cont.): Prime Professional Services (Non-CCNA) by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	NEW HAVEN COUNTY	CT	\$	22,793.54	0.01%	99.79%
REST OF USA	NORFOLK CITY	VA	\$	21,700.00	0.01%	99.80%
REST OF USA	SUMMIT COUNTY	OH	\$	21,488.00	0.01%	99.82%
REST OF USA	SHIAWASSEE COUNTY	MI	\$	21,470.00	0.01%	99.83%
REST OF USA	HUMBOLDT COUNTY	CA	\$	19,500.00	0.01%	99.84%
REST OF USA	TARRANT COUNTY	TX	\$	18,511.25	0.01%	99.85%
REST OF USA	ARAPAHOE COUNTY	CO	\$	17,723.50	0.01%	99.86%
REST OF USA	CONTRA COSTA COUNTY	CA	\$	17,700.00	0.01%	99.86%
REST OF USA	GLOUCESTER COUNTY	NJ	\$	15,750.00	0.01%	99.87%
REST OF USA	DENVER COUNTY	CO	\$	15,591.00	0.01%	99.88%
REST OF USA	ST. LOUIS COUNTY	MO	\$	14,950.00	0.01%	99.89%
REST OF USA	KANE COUNTY	IL	\$	14,752.16	0.01%	99.90%
REST OF USA	WESTCHESTER COUNTY	NY	\$	13,805.17	0.01%	99.90%
REST OF USA	ALLEGHENY COUNTY	PA	\$	13,791.72	0.01%	99.91%
REST OF USA	DANE COUNTY	WI	\$	13,000.00	0.01%	99.92%
REST OF USA	MONROE COUNTY	NY	\$	11,340.00	0.01%	99.92%
REST OF USA	PAMLICO COUNTY	NC	\$	11,115.00	0.01%	99.93%
REST OF USA	MULTNOMAH COUNTY	OR	\$	9,893.71	0.01%	99.93%
REST OF USA	COLLIN COUNTY	TX	\$	7,990.00	0.00%	99.94%
REST OF USA	MAHONING COUNTY	OH	\$	7,695.00	0.00%	99.94%
REST OF USA	DAKOTA COUNTY	MN	\$	7,150.00	0.00%	99.95%
REST OF USA	WYOMING COUNTY	NY	\$	6,337.91	0.00%	99.95%
REST OF USA	DOUGLAS COUNTY	NE	\$	6,250.00	0.00%	99.95%
REST OF USA	RIVERSIDE COUNTY	CA	\$	6,068.31	0.00%	99.96%
REST OF USA	SACRAMENTO COUNTY	CA	\$	6,019.50	0.00%	99.96%
REST OF USA	HABERSHAM COUNTY	GA	\$	6,000.00	0.00%	99.96%
REST OF USA	EL PASO COUNTY	CO	\$	5,988.00	0.00%	99.97%
REST OF USA	YORK COUNTY	PA	\$	5,460.00	0.00%	99.97%
REST OF USA	INGHAM COUNTY	MI	\$	5,365.00	0.00%	99.97%
REST OF USA	SANTA CLARA COUNTY	CA	\$	5,335.00	0.00%	99.97%
REST OF USA	ESSEX COUNTY	MA	\$	5,244.60	0.00%	99.98%
REST OF USA	PHILADELPHIA COUNTY	PA	\$	4,205.00	0.00%	99.98%
REST OF USA	POLK COUNTY	IA	\$	3,676.00	0.00%	99.98%
REST OF USA	NEVADA COUNTY	CA	\$	3,618.37	0.00%	99.98%
REST OF USA	BUNCOMBE COUNTY	NC	\$	3,482.14	0.00%	99.98%
REST OF USA	MADISON COUNTY	MO	\$	3,400.00	0.00%	99.99%
REST OF USA	BOULDER COUNTY	CO	\$	2,977.24	0.00%	99.99%
REST OF USA	CHARLESTON COUNTY	SC	\$	2,500.00	0.00%	99.99%
REST OF USA	QUEENS COUNTY	NY	\$	2,430.00	0.00%	99.99%
REST OF USA	RICHLAND COUNTY	SC	\$	2,359.00	0.00%	99.99%

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Table D-3 (cont.): Prime Professional Services (Non-CCNA) by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	FRANKLIN COUNTY	OH	\$	2,350.00	0.00%	99.99%
REST OF USA	OKLAHOMA COUNTY	OK	\$	2,219.31	0.00%	99.99%
REST OF USA	NIAGARA COUNTY	NY	\$	2,020.00	0.00%	99.99%
REST OF USA	LEHIGH COUNTY	PA	\$	1,869.02	0.00%	100.00%
REST OF USA	ANDROSCOGGIN COUN	ME	\$	1,630.50	0.00%	100.00%
REST OF USA	TALLADEGA COUNTY	AL	\$	1,232.00	0.00%	100.00%
REST OF USA	MONTGOMERY COUNTY	NY	\$	1,211.85	0.00%	100.00%
REST OF USA	BRISTOL COUNTY	MA	\$	1,012.38	0.00%	100.00%
REST OF USA	JOHNSON COUNTY	KS	\$	950.00	0.00%	100.00%
REST OF USA	ALBANY COUNTY	NY	\$	744.25	0.00%	100.00%
REST OF USA	RANDOLPH COUNTY	NC	\$	735.42	0.00%	100.00%
REST OF USA	THURSTON COUNTY	WA	\$	532.60	0.00%	100.00%
REST OF USA	ONONDAGA COUNTY	NY	\$	191.15	0.00%	100.00%
REST OF USA	TRAVIS COUNTY	TX	\$	149.95	0.00%	100.00%
REST OF USA	HUDSON COUNTY	NJ	\$	110.00	0.00%	100.00%
REST OF USA	ST. CLAIR COUNTY	IL	\$	58.00	0.00%	100.00%
REST OF USA	EDMONSON COUNTY	KY	\$	50.00	0.00%	100.00%
REST OF USA	SANTA BARBARA COUN	CA	\$	39.95	0.00%	100.00%
REST OF USA	ANOKA COUNTY	MN	\$	23.00	0.00%	100.00%

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Table D-4: Prime Services by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Market Type	County	State	Total Amount	Percent	Cumulative Percent
PALM BEACH COUNTY	PALM BEACH COUNTY	FL	\$ 136,787,372.24	74.09%	74.09%
MSA	MIAMI-DADE COUNTY	FL	\$ 8,361,225.00	4.53%	78.62%
MSA	BROWARD COUNTY	FL	\$ 6,910,318.13	3.74%	82.36%
CSA	MARTIN COUNTY	FL	\$ 429,683.75	0.23%	82.60%
CSA	ST. LUCIE COUNTY	FL	\$ 274,440.95	0.15%	82.74%
CSA	OKEECHOBEE COUNTY	FL	\$ 56,447.50	0.03%	82.77%
CSA	INDIAN RIVER COUNTY	FL	\$ 21,270.65	0.01%	82.79%
REST OF FL	ORANGE COUNTY	FL	\$ 722,098.56	0.39%	83.18%
REST OF FL	HILLSBOROUGH COUNTY	FL	\$ 704,867.48	0.38%	83.56%
REST OF FL	DUVAL COUNTY	FL	\$ 574,314.90	0.31%	83.87%
REST OF FL	PASCO COUNTY	FL	\$ 504,021.74	0.27%	84.14%
REST OF FL	ST. JOHNS COUNTY	FL	\$ 297,682.76	0.16%	84.30%
REST OF FL	POLK COUNTY	FL	\$ 181,372.00	0.10%	84.40%
REST OF FL	BREVARD COUNTY	FL	\$ 81,389.32	0.04%	84.45%
REST OF FL	MANATEE COUNTY	FL	\$ 52,113.80	0.03%	84.47%
REST OF FL	LEON COUNTY	FL	\$ 49,601.16	0.03%	84.50%
REST OF FL	LEE COUNTY	FL	\$ 45,706.54	0.02%	84.53%
REST OF FL	PINELLAS COUNTY	FL	\$ 44,220.45	0.02%	84.55%
REST OF FL	ALACHUA COUNTY	FL	\$ 23,250.00	0.01%	84.56%
REST OF FL	SEMINOLE COUNTY	FL	\$ 18,060.94	0.01%	84.57%
REST OF FL	VOLUSIA COUNTY	FL	\$ 2,756.25	0.00%	84.57%
REST OF FL	LAKE COUNTY	FL	\$ 2,066.01	0.00%	84.58%
REST OF FL	FLAGLER COUNTY	FL	\$ 1,335.00	0.00%	84.58%
REST OF FL	CITRUS COUNTY	FL	\$ 972.00	0.00%	84.58%
REST OF FL	SUMTER COUNTY	FL	\$ 483.79	0.00%	84.58%
REST OF FL	OSCEOLA COUNTY	FL	\$ 150.84	0.00%	84.58%
REST OF USA	BOULDER COUNTY	CO	\$ 7,216,735.43	3.91%	88.49%
REST OF USA	SOMERSET COUNTY	NJ	\$ 3,063,427.05	1.66%	90.15%
REST OF USA	DALLAS COUNTY	TX	\$ 2,560,810.37	1.39%	91.53%
REST OF USA	COOK COUNTY	IL	\$ 1,665,092.31	0.90%	92.43%
REST OF USA	FOND DU LAC COUNTY	WI	\$ 1,402,614.28	0.76%	93.19%
REST OF USA	FAIRFAX COUNTY	VA	\$ 902,655.09	0.49%	93.68%
REST OF USA	DENTON COUNTY	TX	\$ 838,324.25	0.45%	94.14%
REST OF USA	SALT LAKE COUNTY	UT	\$ 751,326.00	0.41%	94.54%
REST OF USA	MARICOPA COUNTY	AZ	\$ 705,958.19	0.38%	94.93%
REST OF USA	HARTFORD COUNTY	CT	\$ 583,847.48	0.32%	95.24%
REST OF USA	FULTON COUNTY	GA	\$ 564,975.09	0.31%	95.55%
REST OF USA	HUDSON COUNTY	NJ	\$ 519,545.20	0.28%	95.83%
REST OF USA	MECKLENBURG COUNTY	NC	\$ 516,151.66	0.28%	96.11%
REST OF USA	HARRIS COUNTY	TX	\$ 504,368.18	0.27%	96.38%

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Table D-4 (cont.): Prime Services by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	DENVER COUNTY	CO	\$ 464,623.88	0.25%	96.63%
REST OF USA	LINN COUNTY	IA	\$ 416,000.00	0.23%	96.86%
REST OF USA	PIMA COUNTY	AZ	\$ 401,912.03	0.22%	97.08%
REST OF USA	NEW YORK COUNTY	NY	\$ 389,381.24	0.21%	97.29%
REST OF USA	WILLIAMSBURG COUNTY	SC	\$ 364,918.75	0.20%	97.49%
REST OF USA	LOS ANGELES COUNTY	CA	\$ 319,857.96	0.17%	97.66%
REST OF USA	EAST BATON ROUGE PARISH	LA	\$ 309,485.00	0.17%	97.83%
REST OF USA	VIRGINIA BEACH CITY	VA	\$ 299,086.00	0.16%	97.99%
REST OF USA	MONTGOMERY COUNTY	PA	\$ 279,200.64	0.15%	98.14%
REST OF USA	FRANKLIN COUNTY	OH	\$ 210,899.08	0.11%	98.25%
REST OF USA	ALLEGHENY COUNTY	PA	\$ 209,041.45	0.11%	98.37%
REST OF USA	MOBILE COUNTY	AL	\$ 207,045.00	0.11%	98.48%
REST OF USA	MONTGOMERY COUNTY	TX	\$ 188,191.98	0.10%	98.58%
REST OF USA	HENNEPIN COUNTY	MN	\$ 173,571.06	0.09%	98.68%
REST OF USA	JEFFERSON COUNTY	AL	\$ 165,000.00	0.09%	98.77%
REST OF USA	HENRICO COUNTY	VA	\$ 150,967.93	0.08%	98.85%
REST OF USA	HOWARD COUNTY	IN	\$ 140,001.91	0.08%	98.92%
REST OF USA	SUFFOLK COUNTY	MA	\$ 121,357.63	0.07%	98.99%
REST OF USA	HARFORD COUNTY	MD	\$ 114,872.50	0.06%	99.05%
REST OF USA	FREDERICK COUNTY	MD	\$ 114,748.50	0.06%	99.11%
REST OF USA	WASHINGTON COUNTY	MN	\$ 111,951.46	0.06%	99.17%
REST OF USA	CLARK COUNTY	IN	\$ 108,479.74	0.06%	99.23%
REST OF USA	COLLIN COUNTY	TX	\$ 95,231.11	0.05%	99.28%
REST OF USA	SAN BERNARDINO COUNTY	CA	\$ 94,150.00	0.05%	99.33%
REST OF USA	DOUGLAS COUNTY	CO	\$ 89,280.00	0.05%	99.38%
REST OF USA	ST. LOUIS COUNTY	MO	\$ 86,757.00	0.05%	99.43%
REST OF USA	GREENVILLE COUNTY	SC	\$ 78,040.88	0.04%	99.47%
REST OF USA	DOUGLAS COUNTY	IL	\$ 60,365.96	0.03%	99.51%
REST OF USA	DAVIDSON COUNTY	TN	\$ 53,517.15	0.03%	99.53%
REST OF USA	SAN DIEGO COUNTY	CA	\$ 43,475.09	0.02%	99.56%
REST OF USA	ST. LOUIS CITY	MO	\$ 42,834.56	0.02%	99.58%
REST OF USA	WAYNE COUNTY	MI	\$ 42,700.00	0.02%	99.60%
REST OF USA	RICHLAND COUNTY	SC	\$ 40,098.75	0.02%	99.63%
REST OF USA	BRAZOS COUNTY	TX	\$ 39,071.14	0.02%	99.65%
REST OF USA	MARSHALL COUNTY	IN	\$ 37,410.49	0.02%	99.67%
REST OF USA	LEHIGH COUNTY	PA	\$ 34,940.71	0.02%	99.69%
REST OF USA	TULSA COUNTY	OK	\$ 31,520.00	0.02%	99.70%
REST OF USA	HOUSTON COUNTY	AL	\$ 31,161.84	0.02%	99.72%
REST OF USA	ROCKINGHAM COUNTY	NH	\$ 30,000.00	0.02%	99.74%
REST OF USA	RICE COUNTY	MN	\$ 27,472.91	0.01%	99.75%
REST OF USA	DISTRICT OF COLUMBIA	DC	\$ 26,496.00	0.01%	99.77%

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Table D-4 (cont.): Prime Services by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	RILEY COUNTY	KS	\$	23,996.28	0.01%	99.78%
REST OF USA	FAIRFIELD COUNTY	CT	\$	23,798.80	0.01%	99.79%
REST OF USA	KINGS COUNTY	NY	\$	23,345.70	0.01%	99.80%
REST OF USA	TARRANT COUNTY	TX	\$	22,662.35	0.01%	99.82%
REST OF USA	EL DORADO COUNTY	CA	\$	22,300.00	0.01%	99.83%
REST OF USA	MIDDLESEX COUNTY	NJ	\$	21,120.00	0.01%	99.84%
REST OF USA	WAKE COUNTY	NC	\$	19,638.00	0.01%	99.85%
REST OF USA	CLARK COUNTY	NV	\$	18,500.00	0.01%	99.86%
REST OF USA	DEKALB COUNTY	GA	\$	16,900.00	0.01%	99.87%
REST OF USA	NEW LONDON COUNTY	CT	\$	16,120.00	0.01%	99.88%
REST OF USA	FRANKLIN COUNTY	AL	\$	15,952.39	0.01%	99.89%
REST OF USA	MARION COUNTY	IN	\$	14,543.25	0.01%	99.89%
REST OF USA	ONONDAGA COUNTY	NY	\$	13,754.60	0.01%	99.90%
REST OF USA	SONOMA COUNTY	CA	\$	11,440.00	0.01%	99.91%
REST OF USA	ESSEX COUNTY	NJ	\$	11,436.00	0.01%	99.91%
REST OF USA	NASSAU COUNTY	NY	\$	10,898.00	0.01%	99.92%
REST OF USA	WESTCHESTER COUNTY	NY	\$	9,534.43	0.01%	99.93%
REST OF USA	ORANGE COUNTY	CA	\$	8,323.00	0.00%	99.93%
REST OF USA	HAMILTON COUNTY	OH	\$	7,742.91	0.00%	99.93%
REST OF USA	BOYD COUNTY	KY	\$	7,646.73	0.00%	99.94%
REST OF USA	SAN MATEO COUNTY	CA	\$	7,436.29	0.00%	99.94%
REST OF USA	BOONE COUNTY	AR	\$	7,045.98	0.00%	99.95%
REST OF USA	SHIAWASSEE COUNTY	MI	\$	6,457.57	0.00%	99.95%
REST OF USA	CLERMONT COUNTY	OH	\$	5,947.20	0.00%	99.95%
REST OF USA	HALL COUNTY	GA	\$	5,736.72	0.00%	99.96%
REST OF USA	EL PASO COUNTY	CO	\$	5,400.00	0.00%	99.96%
REST OF USA	PLACER COUNTY	CA	\$	5,092.00	0.00%	99.96%
REST OF USA	UNION COUNTY	NJ	\$	5,025.00	0.00%	99.96%
REST OF USA	GILMER COUNTY	GA	\$	4,473.80	0.00%	99.97%
REST OF USA	ERIE COUNTY	NY	\$	4,193.25	0.00%	99.97%
REST OF USA	SNOHOMISH COUNTY	WA	\$	4,054.13	0.00%	99.97%
REST OF USA	CRAVEN COUNTY	NC	\$	4,000.00	0.00%	99.97%
REST OF USA	PASSAIC COUNTY	NJ	\$	3,705.00	0.00%	99.98%
REST OF USA	HAMPDEN COUNTY	MA	\$	3,424.18	0.00%	99.98%
REST OF USA	PICKENS COUNTY	GA	\$	3,127.32	0.00%	99.98%
REST OF USA	DUPAGE COUNTY	IL	\$	3,125.45	0.00%	99.98%
REST OF USA	ADA COUNTY	ID	\$	3,072.50	0.00%	99.98%
REST OF USA	KENNEBEC COUNTY	ME	\$	2,978.51	0.00%	99.98%
REST OF USA	GUADALUPE COUNTY	TX	\$	2,850.00	0.00%	99.99%
REST OF USA	SHAWNEE COUNTY	KS	\$	2,800.00	0.00%	99.99%
REST OF USA	COBB COUNTY	GA	\$	2,755.00	0.00%	99.99%

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Table D-4 (cont.): Prime Services by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	PRINCE GEORGE'S COUNT	MD	\$	2,564.79	0.00%	99.99%
REST OF USA	BERGEN COUNTY	NJ	\$	2,500.00	0.00%	99.99%
REST OF USA	ATLANTIC COUNTY	NJ	\$	2,234.00	0.00%	99.99%
REST OF USA	MONTGOMERY COUNTY	OH	\$	1,897.00	0.00%	99.99%
REST OF USA	RAMSEY COUNTY	MN	\$	1,743.00	0.00%	99.99%
REST OF USA	BALTIMORE COUNTY	MD	\$	1,419.50	0.00%	100.00%
REST OF USA	ST. CHARLES COUNTY	MO	\$	1,344.46	0.00%	100.00%
REST OF USA	PHILADELPHIA COUNTY	PA	\$	1,000.00	0.00%	100.00%
REST OF USA	WAUKESHA COUNTY	WI	\$	910.00	0.00%	100.00%
REST OF USA	BUNCOMBE COUNTY	NC	\$	800.00	0.00%	100.00%
REST OF USA	GWINNETT COUNTY	GA	\$	783.80	0.00%	100.00%
REST OF USA	ARENAC COUNTY	MI	\$	740.00	0.00%	100.00%
REST OF USA	MARIN COUNTY	CA	\$	661.62	0.00%	100.00%
REST OF USA	MONTGOMERY COUNTY	MD	\$	510.00	0.00%	100.00%
REST OF USA	MORTON COUNTY	ND	\$	500.00	0.00%	100.00%
REST OF USA	ALLEN COUNTY	IN	\$	176.50	0.00%	100.00%
REST OF USA	LOUDOUN COUNTY	VA	\$	170.00	0.00%	100.00%
REST OF USA	MADISON COUNTY	IN	\$	144.00	0.00%	100.00%
REST OF USA	MERCER COUNTY	NJ	\$	123.45	0.00%	100.00%
REST OF USA	SMITH COUNTY	TX	\$	120.00	0.00%	100.00%
REST OF USA	MAHONING COUNTY	OH	\$	100.00	0.00%	100.00%
REST OF USA	SUMMIT COUNTY	OH	\$	75.00	0.00%	100.00%
REST OF USA	LAWRENCE COUNTY	PA	\$	66.94	0.00%	100.00%
REST OF USA	SUMTER COUNTY	SC	\$	50.00	0.00%	100.00%
REST OF USA	WASHINGTON COUNTY	OR	\$	50.00	0.00%	100.00%
REST OF USA	HOWARD COUNTY	MD	\$	-	0.00%	100.00%

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Table D-5: Prime Goods/Commodities by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Market Type	County	State	Total Amount	Percent	Cumulative Percent
PALM BEACH COUNTY	PALM BEACH COUNTY	FL	\$ 260,895,134.52	44.53%	44.53%
MSA	MIAMI-DADE COUNTY	FL	\$ 112,159,888.57	19.14%	63.67%
MSA	BROWARD COUNTY	FL	\$ 44,479,266.16	7.59%	71.27%
CSA	MARTIN COUNTY	FL	\$ 1,576,999.67	0.27%	71.53%
CSA	ST. LUCIE COUNTY	FL	\$ 983,239.28	0.17%	71.70%
CSA	OKEECHOBEE COUNTY	FL	\$ 17,293.00	0.00%	71.71%
CSA	INDIAN RIVER COUNTY	FL	\$ 8,094.55	0.00%	71.71%
REST OF FL	HILLSBOROUGH COUNTY	FL	\$ 18,785,377.10	3.21%	74.91%
REST OF FL	POLK COUNTY	FL	\$ 16,905,975.86	2.89%	77.80%
REST OF FL	MANATEE COUNTY	FL	\$ 6,187,924.08	1.06%	78.85%
REST OF FL	SEMINOLE COUNTY	FL	\$ 4,301,392.39	0.73%	79.59%
REST OF FL	ORANGE COUNTY	FL	\$ 3,132,483.27	0.53%	80.12%
REST OF FL	DUVAL COUNTY	FL	\$ 2,480,843.13	0.42%	80.55%
REST OF FL	ALACHUA COUNTY	FL	\$ 1,849,676.84	0.32%	80.86%
REST OF FL	HIGHLANDS COUNTY	FL	\$ 1,829,648.17	0.31%	81.17%
REST OF FL	LEE COUNTY	FL	\$ 1,764,157.46	0.30%	81.48%
REST OF FL	SARASOTA COUNTY	FL	\$ 1,654,171.46	0.28%	81.76%
REST OF FL	BREVARD COUNTY	FL	\$ 804,898.04	0.14%	81.90%
REST OF FL	PASCO COUNTY	FL	\$ 509,468.62	0.09%	81.98%
REST OF FL	PINELLAS COUNTY	FL	\$ 458,809.86	0.08%	82.06%
REST OF FL	ESCAMBIA COUNTY	FL	\$ 303,619.34	0.05%	82.11%
REST OF FL	OSCEOLA COUNTY	FL	\$ 297,669.75	0.05%	82.16%
REST OF FL	CLAY COUNTY	FL	\$ 229,428.00	0.04%	82.20%
REST OF FL	LEON COUNTY	FL	\$ 126,970.66	0.02%	82.22%
REST OF FL	MARION COUNTY	FL	\$ 49,986.53	0.01%	82.23%
REST OF FL	VOLUSIA COUNTY	FL	\$ 46,148.99	0.01%	82.24%
REST OF FL	LAKE COUNTY	FL	\$ 22,764.30	0.00%	82.24%
REST OF FL	ST. JOHNS COUNTY	FL	\$ 19,378.50	0.00%	82.25%
REST OF FL	CITRUS COUNTY	FL	\$ 14,948.00	0.00%	82.25%
REST OF FL	OKALOOSA COUNTY	FL	\$ 8,550.00	0.00%	82.25%
REST OF FL	HENDRY COUNTY	FL	\$ 2,089.22	0.00%	82.25%
REST OF FL	SUMTER COUNTY	FL	\$ 2,049.00	0.00%	82.25%
REST OF FL	COLLIER COUNTY	FL	\$ 1,529.67	0.00%	82.25%
REST OF FL	HERNANDO COUNTY	FL	\$ 1,500.00	0.00%	82.25%
REST OF FL	FLAGLER COUNTY	FL	\$ 400.00	0.00%	82.25%
REST OF FL	NASSAU COUNTY	FL	\$ 83.10	0.00%	82.25%
REST OF USA	FULTON COUNTY	GA	\$ 22,473,792.50	3.84%	86.09%
REST OF USA	DOUGLAS COUNTY	NE	\$ 8,677,280.06	1.48%	87.57%
REST OF USA	COOK COUNTY	IL	\$ 8,178,977.78	1.40%	88.97%
REST OF USA	MAHASKA COUNTY	IA	\$ 6,368,427.41	1.09%	90.05%

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Table D-5 (cont.): Prime Goods/Commodities by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	ALLEGHENY COUNTY	PA	\$ 3,756,064.61	0.64%	90.69%
REST OF USA	FORT BEND COUNTY	TX	\$ 3,099,543.94	0.53%	91.22%
REST OF USA	SAN DIEGO COUNTY	CA	\$ 2,300,686.69	0.39%	91.62%
REST OF USA	DALLAS COUNTY	TX	\$ 2,220,805.66	0.38%	92.00%
REST OF USA	LAKE COUNTY	IL	\$ 1,965,445.02	0.34%	92.33%
REST OF USA	WAYNE COUNTY	MI	\$ 1,916,279.34	0.33%	92.66%
REST OF USA	LIBERTY COUNTY	GA	\$ 1,770,023.49	0.30%	92.96%
REST OF USA	CENTRE COUNTY	PA	\$ 1,755,599.32	0.30%	93.26%
REST OF USA	GUILFORD COUNTY	NC	\$ 1,683,385.35	0.29%	93.55%
REST OF USA	UTAH COUNTY	UT	\$ 1,666,754.93	0.28%	93.83%
REST OF USA	SALT LAKE COUNTY	UT	\$ 1,486,607.79	0.25%	94.08%
REST OF USA	MORGAN COUNTY	AL	\$ 1,439,203.74	0.25%	94.33%
REST OF USA	FRANKLIN COUNTY	OH	\$ 1,307,061.80	0.22%	94.55%
REST OF USA	SPARTANBURG COUNTY	SC	\$ 1,215,357.72	0.21%	94.76%
REST OF USA	MECKLENBURG COUNTY	NC	\$ 1,183,448.57	0.20%	94.96%
REST OF USA	GREENVILLE COUNTY	SC	\$ 1,107,067.54	0.19%	95.15%
REST OF USA	ST. LOUIS COUNTY	MO	\$ 998,981.30	0.17%	95.32%
REST OF USA	LAKE COUNTY	OH	\$ 994,471.58	0.17%	95.49%
REST OF USA	NEW YORK COUNTY	NY	\$ 990,858.82	0.17%	95.66%
REST OF USA	TARRANT COUNTY	TX	\$ 902,422.62	0.15%	95.82%
REST OF USA	MONTGOMERY COUNTY	TX	\$ 858,881.77	0.15%	95.96%
REST OF USA	WAKE COUNTY	NC	\$ 769,993.30	0.13%	96.09%
REST OF USA	JEFFERSON COUNTY	AL	\$ 733,007.47	0.13%	96.22%
REST OF USA	HAMILTON COUNTY	OH	\$ 661,276.95	0.11%	96.33%
REST OF USA	MARICOPA COUNTY	AZ	\$ 654,730.04	0.11%	96.44%
REST OF USA	FREDERICK COUNTY	MD	\$ 612,168.00	0.10%	96.55%
REST OF USA	BROWN COUNTY	WI	\$ 607,549.83	0.10%	96.65%
REST OF USA	FAIRFIELD COUNTY	CT	\$ 598,255.65	0.10%	96.75%
REST OF USA	SAN MATEO COUNTY	CA	\$ 548,983.25	0.09%	96.85%
REST OF USA	CABARRUS COUNTY	NC	\$ 537,858.21	0.09%	96.94%
REST OF USA	ANNE ARUNDEL COUNTY	MD	\$ 523,403.47	0.09%	97.03%
REST OF USA	GWINNETT COUNTY	GA	\$ 501,383.65	0.09%	97.11%
REST OF USA	HENNEPIN COUNTY	MN	\$ 430,581.11	0.07%	97.19%
REST OF USA	JEFFERSON COUNTY	KY	\$ 427,095.75	0.07%	97.26%
REST OF USA	CUYAHOGA COUNTY	OH	\$ 420,792.23	0.07%	97.33%
REST OF USA	ERIE COUNTY	NY	\$ 419,993.17	0.07%	97.40%
REST OF USA	SUFFOLK COUNTY	NY	\$ 416,325.00	0.07%	97.47%
REST OF USA	GUADALUPE COUNTY	TX	\$ 414,809.00	0.07%	97.55%
REST OF USA	ST. TAMMANY PARISH	LA	\$ 391,137.66	0.07%	97.61%
REST OF USA	PHILADELPHIA COUNTY	PA	\$ 374,861.85	0.06%	97.68%
REST OF USA	CLARK COUNTY	NV	\$ 337,649.65	0.06%	97.73%

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Table D-5 (cont.): Prime Goods/Commodities by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	DELAWARE COUNTY	OH	\$ 335,919.40	0.06%	97.79%
REST OF USA	ADAMS COUNTY	CO	\$ 333,598.94	0.06%	97.85%
REST OF USA	OAKLAND COUNTY	MI	\$ 306,745.39	0.05%	97.90%
REST OF USA	DOUGLAS COUNTY	GA	\$ 291,699.73	0.05%	97.95%
REST OF USA	HILLSBOROUGH COUNTY	NH	\$ 289,784.67	0.05%	98.00%
REST OF USA	MAURY COUNTY	TN	\$ 286,835.40	0.05%	98.05%
REST OF USA	LOS ANGELES COUNTY	CA	\$ 266,259.05	0.05%	98.09%
REST OF USA	RENSSELAER COUNTY	NY	\$ 255,051.88	0.04%	98.14%
REST OF USA	MONTGOMERY COUNTY	PA	\$ 245,138.19	0.04%	98.18%
REST OF USA	JASPER COUNTY	MO	\$ 240,658.46	0.04%	98.22%
REST OF USA	ST. LOUIS CITY	MO	\$ 236,217.24	0.04%	98.26%
REST OF USA	MULTNOMAH COUNTY	OR	\$ 224,923.44	0.04%	98.30%
REST OF USA	LASALLE COUNTY	IL	\$ 202,849.95	0.03%	98.33%
REST OF USA	WASHINGTON COUNTY	PA	\$ 189,355.61	0.03%	98.37%
REST OF USA	IREDELL COUNTY	NC	\$ 183,786.56	0.03%	98.40%
REST OF USA	MONMOUTH COUNTY	NJ	\$ 183,659.73	0.03%	98.43%
REST OF USA	HENRICO COUNTY	VA	\$ 183,090.30	0.03%	98.46%
REST OF USA	ONONDAGA COUNTY	NY	\$ 177,492.77	0.03%	98.49%
REST OF USA	HALL COUNTY	GA	\$ 176,730.31	0.03%	98.52%
REST OF USA	UNION COUNTY	NJ	\$ 174,680.17	0.03%	98.55%
REST OF USA	SHAWNEE COUNTY	KS	\$ 173,705.79	0.03%	98.58%
REST OF USA	YORK COUNTY	SC	\$ 164,790.13	0.03%	98.61%
REST OF USA	HARTFORD COUNTY	CT	\$ 164,333.36	0.03%	98.64%
REST OF USA	MEDINA COUNTY	OH	\$ 163,498.21	0.03%	98.66%
REST OF USA	CAMDEN COUNTY	NJ	\$ 162,884.77	0.03%	98.69%
REST OF USA	OCEAN COUNTY	NJ	\$ 157,498.00	0.03%	98.72%
REST OF USA	MIDDLESEX COUNTY	NJ	\$ 153,475.52	0.03%	98.75%
REST OF USA	BROOME COUNTY	NY	\$ 152,376.40	0.03%	98.77%
REST OF USA	BURLINGTON COUNTY	NJ	\$ 150,427.02	0.03%	98.80%
REST OF USA	SHELBY COUNTY	TN	\$ 149,052.21	0.03%	98.82%
REST OF USA	MONTGOMERY COUNTY	OH	\$ 144,815.09	0.02%	98.85%
REST OF USA	TULSA COUNTY	OK	\$ 142,562.58	0.02%	98.87%
REST OF USA	PRINCE GEORGE'S COUNT	MD	\$ 141,258.21	0.02%	98.90%
REST OF USA	ROCKINGHAM COUNTY	NH	\$ 140,774.80	0.02%	98.92%
REST OF USA	JEFFERSON COUNTY	CO	\$ 138,060.84	0.02%	98.94%
REST OF USA	ALBANY COUNTY	NY	\$ 136,952.28	0.02%	98.97%
REST OF USA	WOOD COUNTY	OH	\$ 136,363.00	0.02%	98.99%
REST OF USA	FAYETTE COUNTY	GA	\$ 133,585.50	0.02%	99.01%
REST OF USA	MILWAUKEE COUNTY	WI	\$ 126,341.06	0.02%	99.03%
REST OF USA	BALTIMORE CITY	MD	\$ 124,442.18	0.02%	99.06%
REST OF USA	GREENE COUNTY	MO	\$ 123,577.99	0.02%	99.08%

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Table D-5 (cont.): Prime Goods/Commodities by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	KING COUNTY	WA	\$ 122,480.47	0.02%	99.10%
REST OF USA	BOULDER COUNTY	CO	\$ 121,108.56	0.02%	99.12%
REST OF USA	DANE COUNTY	WI	\$ 116,398.47	0.02%	99.14%
REST OF USA	HUDSON COUNTY	NJ	\$ 111,637.74	0.02%	99.16%
REST OF USA	WESTMORELAND COUNTY	PA	\$ 107,548.55	0.02%	99.18%
REST OF USA	SUFFOLK COUNTY	MA	\$ 105,477.05	0.02%	99.19%
REST OF USA	MERIWETHER COUNTY	GA	\$ 103,050.00	0.02%	99.21%
REST OF USA	BEXAR COUNTY	TX	\$ 101,639.68	0.02%	99.23%
REST OF USA	RICHMOND COUNTY	GA	\$ 98,025.00	0.02%	99.25%
REST OF USA	CHITTENDEN COUNTY	VT	\$ 95,440.16	0.02%	99.26%
REST OF USA	HIDALGO COUNTY	TX	\$ 95,199.00	0.02%	99.28%
REST OF USA	CHARLESTON COUNTY	SC	\$ 92,744.90	0.02%	99.29%
REST OF USA	MERCER COUNTY	WV	\$ 88,692.17	0.02%	99.31%
REST OF USA	ESSEX COUNTY	NJ	\$ 86,233.34	0.01%	99.32%
REST OF USA	BALTIMORE COUNTY	MD	\$ 83,394.19	0.01%	99.34%
REST OF USA	CHATHAM COUNTY	GA	\$ 82,434.25	0.01%	99.35%
REST OF USA	EL DORADO COUNTY	CA	\$ 81,548.00	0.01%	99.37%
REST OF USA	ALBANY COUNTY	WY	\$ 80,753.15	0.01%	99.38%
REST OF USA	WALTON COUNTY	GA	\$ 79,625.37	0.01%	99.39%
REST OF USA	MIDDLESEX COUNTY	MA	\$ 79,178.29	0.01%	99.41%
REST OF USA	SAN FRANCISCO COUNTY	CA	\$ 74,049.00	0.01%	99.42%
REST OF USA	JACKSON COUNTY	MO	\$ 73,672.86	0.01%	99.43%
REST OF USA	CAMPBELL COUNTY	KY	\$ 72,880.00	0.01%	99.44%
REST OF USA	ORANGE COUNTY	CA	\$ 72,299.94	0.01%	99.46%
REST OF USA	WASHINGTON COUNTY	IA	\$ 70,240.00	0.01%	99.47%
REST OF USA	NORFOLK COUNTY	MA	\$ 70,051.99	0.01%	99.48%
REST OF USA	SAC COUNTY	IA	\$ 66,554.00	0.01%	99.49%
REST OF USA	HOCKING COUNTY	OH	\$ 64,932.46	0.01%	99.50%
REST OF USA	PLYMOUTH COUNTY	MA	\$ 64,260.00	0.01%	99.51%
REST OF USA	MARATHON COUNTY	WI	\$ 64,130.18	0.01%	99.52%
REST OF USA	DAKOTA COUNTY	MN	\$ 62,825.96	0.01%	99.54%
REST OF USA	RALEIGH COUNTY	WV	\$ 62,775.66	0.01%	99.55%
REST OF USA	HARRIS COUNTY	TX	\$ 61,138.00	0.01%	99.56%
REST OF USA	QUEENS COUNTY	NY	\$ 58,476.86	0.01%	99.57%
REST OF USA	EAST BATON ROUGE PARISH	LA	\$ 58,068.45	0.01%	99.58%
REST OF USA	ROSS COUNTY	OH	\$ 56,294.58	0.01%	99.59%
REST OF USA	NASSAU COUNTY	NY	\$ 56,259.38	0.01%	99.60%
REST OF USA	FULTON COUNTY	IN	\$ 55,734.89	0.01%	99.61%
REST OF USA	OTTAWA COUNTY	MI	\$ 54,855.40	0.01%	99.61%
REST OF USA	ONEIDA COUNTY	NY	\$ 51,478.96	0.01%	99.62%
REST OF USA	DEKALB COUNTY	AL	\$ 46,394.72	0.01%	99.63%

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Table D-5 (cont.): Prime Goods/Commodities by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	NEW HANOVER COUNTY	NC	\$	45,900.32	0.01%	99.64%
REST OF USA	SANTA CLARA COUNTY	CA	\$	45,168.72	0.01%	99.65%
REST OF USA	WILSON COUNTY	TN	\$	44,346.60	0.01%	99.65%
REST OF USA	COBB COUNTY	GA	\$	44,226.35	0.01%	99.66%
REST OF USA	MCLEAN COUNTY	IL	\$	41,997.35	0.01%	99.67%
REST OF USA	MONROE COUNTY	PA	\$	41,906.93	0.01%	99.68%
REST OF USA	NEW HAVEN COUNTY	CT	\$	41,892.07	0.01%	99.68%
REST OF USA	GRANT COUNTY	IN	\$	41,430.74	0.01%	99.69%
REST OF USA	CADDO PARISH	LA	\$	40,412.90	0.01%	99.70%
REST OF USA	CONTRA COSTA COUNTY	CA	\$	39,147.85	0.01%	99.70%
REST OF USA	BERGEN COUNTY	NJ	\$	38,178.82	0.01%	99.71%
REST OF USA	RUTHERFORD COUNTY	TN	\$	36,884.57	0.01%	99.72%
REST OF USA	DUPAGE COUNTY	IL	\$	35,542.95	0.01%	99.72%
REST OF USA	DAVISS COUNTY	KY	\$	34,686.50	0.01%	99.73%
REST OF USA	TUSCALOOSA COUNTY	AL	\$	33,996.43	0.01%	99.73%
REST OF USA	FAIRFAX COUNTY	VA	\$	33,699.19	0.01%	99.74%
REST OF USA	GRUNDY COUNTY	IL	\$	33,566.61	0.01%	99.75%
REST OF USA	COLUMBIA COUNTY	GA	\$	33,513.31	0.01%	99.75%
REST OF USA	WASHINGTON COUNTY	UT	\$	30,719.00	0.01%	99.76%
REST OF USA	PASSAIC COUNTY	NJ	\$	30,249.00	0.01%	99.76%
REST OF USA	LUZERNE COUNTY	PA	\$	29,812.92	0.01%	99.77%
REST OF USA	COLLIN COUNTY	TX	\$	29,784.94	0.01%	99.77%
REST OF USA	MARION COUNTY	IN	\$	29,505.84	0.01%	99.78%
REST OF USA	UNION COUNTY	NC	\$	29,501.79	0.01%	99.78%
REST OF USA	JEFFERSON COUNTY	IN	\$	28,546.00	0.00%	99.79%
REST OF USA	DURHAM COUNTY	NC	\$	28,458.00	0.00%	99.79%
REST OF USA	ALLEN COUNTY	IN	\$	28,193.40	0.00%	99.80%
REST OF USA	YORK COUNTY	PA	\$	27,709.73	0.00%	99.80%
REST OF USA	BRAZOS COUNTY	TX	\$	26,752.63	0.00%	99.81%
REST OF USA	KNOX COUNTY	IL	\$	24,789.45	0.00%	99.81%
REST OF USA	WILLIAMSON COUNTY	TX	\$	24,787.60	0.00%	99.81%
REST OF USA	MORRIS COUNTY	NJ	\$	22,092.34	0.00%	99.82%
REST OF USA	SUMMIT COUNTY	OH	\$	22,000.00	0.00%	99.82%
REST OF USA	RIVERSIDE COUNTY	CA	\$	21,719.59	0.00%	99.83%
REST OF USA	NEWPORT COUNTY	RI	\$	21,463.30	0.00%	99.83%
REST OF USA	DENTON COUNTY	TX	\$	21,439.17	0.00%	99.83%
REST OF USA	HINDS COUNTY	MS	\$	21,313.18	0.00%	99.84%
REST OF USA	WASHTENAW COUNTY	MI	\$	21,191.99	0.00%	99.84%
REST OF USA	WINONA COUNTY	MN	\$	20,480.00	0.00%	99.84%
REST OF USA	FAUQUIER COUNTY	VA	\$	20,390.00	0.00%	99.85%
REST OF USA	DAVIS COUNTY	UT	\$	20,365.00	0.00%	99.85%

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Table D-5 (cont.): Prime Goods/Commodities by County
(Using Payment Dollars, CY2019-CY2023)
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REST OF USA	KINGS COUNTY	NY	\$	20,202.70	0.00%	99.85%
REST OF USA	MONROE COUNTY	NY	\$	20,122.52	0.00%	99.86%
REST OF USA	WAUKESHA COUNTY	WI	\$	20,025.75	0.00%	99.86%
REST OF USA	GREENE COUNTY	NY	\$	19,228.00	0.00%	99.86%
REST OF USA	WILLIAMSON COUNTY	TN	\$	18,890.55	0.00%	99.87%
REST OF USA	BOND COUNTY	IL	\$	18,116.28	0.00%	99.87%
REST OF USA	SANTA CRUZ COUNTY	CA	\$	17,850.03	0.00%	99.87%
REST OF USA	ORANGE COUNTY	NY	\$	16,809.36	0.00%	99.88%
REST OF USA	CLEVELAND COUNTY	NC	\$	16,457.50	0.00%	99.88%
REST OF USA	DALLAS COUNTY	AL	\$	16,391.00	0.00%	99.88%
REST OF USA	BURLEIGH COUNTY	ND	\$	16,319.23	0.00%	99.89%
REST OF USA	DAVIDSON COUNTY	TN	\$	15,651.81	0.00%	99.89%
REST OF USA	HANCOCK COUNTY	IN	\$	15,427.00	0.00%	99.89%
REST OF USA	LINCOLN COUNTY	NC	\$	15,000.00	0.00%	99.89%
REST OF USA	SAN LUIS OBISPO COUNTY	CA	\$	14,936.34	0.00%	99.90%
REST OF USA	DUBUQUE COUNTY	IA	\$	14,746.16	0.00%	99.90%
REST OF USA	KITSAP COUNTY	WA	\$	14,644.40	0.00%	99.90%
REST OF USA	LIMESTONE COUNTY	AL	\$	13,600.00	0.00%	99.90%
REST OF USA	DISTRICT OF COLUMBIA	DC	\$	13,505.65	0.00%	99.91%
REST OF USA	BUCKS COUNTY	PA	\$	12,584.68	0.00%	99.91%
REST OF USA	SACRAMENTO COUNTY	CA	\$	12,330.36	0.00%	99.91%
REST OF USA	BURNET COUNTY	TX	\$	12,060.00	0.00%	99.91%
REST OF USA	BUTTE COUNTY	SD	\$	11,653.83	0.00%	99.91%
REST OF USA	LOUDOUN COUNTY	VA	\$	11,558.00	0.00%	99.92%
REST OF USA	MONTGOMERY COUNTY	MD	\$	11,386.00	0.00%	99.92%
REST OF USA	BELL COUNTY	TX	\$	11,331.60	0.00%	99.92%
REST OF USA	ALAMEDA COUNTY	CA	\$	11,226.64	0.00%	99.92%
REST OF USA	SUMTER COUNTY	SC	\$	11,172.21	0.00%	99.92%
REST OF USA	BUNCOMBE COUNTY	NC	\$	11,113.92	0.00%	99.93%
REST OF USA	KOSCIUSKO COUNTY	IN	\$	11,058.60	0.00%	99.93%
REST OF USA	MIAMI COUNTY	OH	\$	11,052.48	0.00%	99.93%
REST OF USA	PIMA COUNTY	AZ	\$	11,001.46	0.00%	99.93%
REST OF USA	BROOMFIELD COUNTY	CO	\$	10,925.57	0.00%	99.93%
REST OF USA	YAVAPAI COUNTY	AZ	\$	10,726.50	0.00%	99.93%
REST OF USA	NIAGARA COUNTY	NY	\$	10,563.40	0.00%	99.94%
REST OF USA	RICHLAND COUNTY	SC	\$	10,495.00	0.00%	99.94%
REST OF USA	EL PASO COUNTY	CO	\$	9,450.00	0.00%	99.94%
REST OF USA	CHEYENNE COUNTY	NE	\$	9,289.12	0.00%	99.94%
REST OF USA	KANE COUNTY	IL	\$	9,252.02	0.00%	99.94%
REST OF USA	WASHINGTON COUNTY	OR	\$	9,203.40	0.00%	99.94%
REST OF USA	VENTURA COUNTY	CA	\$	9,049.25	0.00%	99.95%

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Table D-5 (cont.): Prime Goods/Commodities by County
(Using Payment Dollars, CY2019-CY2023)
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REST OF USA	STEPHENS COUNTY	GA	\$	9,000.00	0.00%	99.95%
REST OF USA	MONTGOMERY COUNTY	NC	\$	8,875.00	0.00%	99.95%
REST OF USA	HONOLULU COUNTY	HI	\$	8,355.76	0.00%	99.95%
REST OF USA	ONEIDA COUNTY	WI	\$	8,118.75	0.00%	99.95%
REST OF USA	CARROLL COUNTY	GA	\$	8,099.16	0.00%	99.95%
REST OF USA	MONTGOMERY COUNTY	AL	\$	8,000.00	0.00%	99.95%
REST OF USA	LANCASTER COUNTY	PA	\$	7,959.05	0.00%	99.96%
REST OF USA	GLYNN COUNTY	GA	\$	7,821.00	0.00%	99.96%
REST OF USA	DAVIDSON COUNTY	NC	\$	7,734.40	0.00%	99.96%
REST OF USA	MERCER COUNTY	NJ	\$	7,305.00	0.00%	99.96%
REST OF USA	ELLIS COUNTY	TX	\$	6,938.96	0.00%	99.96%
REST OF USA	FOND DU LAC COUNTY	WI	\$	6,781.17	0.00%	99.96%
REST OF USA	DENVER COUNTY	CO	\$	6,775.22	0.00%	99.96%
REST OF USA	POLK COUNTY	IA	\$	6,674.63	0.00%	99.96%
REST OF USA	CUMBERLAND COUNTY	ME	\$	6,660.54	0.00%	99.97%
REST OF USA	CARVER COUNTY	MN	\$	6,295.52	0.00%	99.97%
REST OF USA	TAZEWELL COUNTY	IL	\$	6,074.49	0.00%	99.97%
REST OF USA	CHESTER COUNTY	PA	\$	6,046.55	0.00%	99.97%
REST OF USA	ATHENS COUNTY	OH	\$	5,576.27	0.00%	99.97%
REST OF USA	ANDERSON COUNTY	SC	\$	5,528.59	0.00%	99.97%
REST OF USA	SAN JUAN COUNTY	NM	\$	5,378.25	0.00%	99.97%
REST OF USA	CLACKAMAS COUNTY	OR	\$	4,930.37	0.00%	99.97%
REST OF USA	CLEVELAND COUNTY	OK	\$	4,846.60	0.00%	99.97%
REST OF USA	LINN COUNTY	OR	\$	4,808.32	0.00%	99.97%
REST OF USA	MEEKER COUNTY	MN	\$	4,624.78	0.00%	99.97%
REST OF USA	ARANSAS COUNTY	TX	\$	4,450.00	0.00%	99.98%
REST OF USA	SANGAMON COUNTY	IL	\$	4,409.91	0.00%	99.98%
REST OF USA	DELAWARE COUNTY	PA	\$	4,201.97	0.00%	99.98%
REST OF USA	GREENE COUNTY	OH	\$	4,109.30	0.00%	99.98%
REST OF USA	SOLANO COUNTY	CA	\$	4,052.35	0.00%	99.98%
REST OF USA	VERMILION COUNTY	IL	\$	3,980.39	0.00%	99.98%
REST OF USA	JACKSON COUNTY	OR	\$	3,890.08	0.00%	99.98%
REST OF USA	JEFFERSON COUNTY	WI	\$	3,865.12	0.00%	99.98%
REST OF USA	JOHNSON COUNTY	KS	\$	3,860.65	0.00%	99.98%
REST OF USA	ULSTER COUNTY	NY	\$	3,531.12	0.00%	99.98%
REST OF USA	LATAH COUNTY	ID	\$	3,447.35	0.00%	99.98%
REST OF USA	HENRY COUNTY	IL	\$	3,330.00	0.00%	99.98%
REST OF USA	MOHAVE COUNTY	AZ	\$	3,302.00	0.00%	99.98%
REST OF USA	WYANDOTTE COUNTY	KS	\$	3,236.60	0.00%	99.98%
REST OF USA	ESSEX COUNTY	MA	\$	3,211.20	0.00%	99.98%
REST OF USA	BROOKINGS COUNTY	SD	\$	2,792.50	0.00%	99.99%

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Table D-5 (cont.): Prime Goods/Commodities by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	CLINTON COUNTY	OH	\$	2,725.78	0.00%	99.99%
REST OF USA	ST. JOSEPH COUNTY	MI	\$	2,650.62	0.00%	99.99%
REST OF USA	CARROLL COUNTY	IL	\$	2,600.50	0.00%	99.99%
REST OF USA	KENT COUNTY	MI	\$	2,583.61	0.00%	99.99%
REST OF USA	SEVIER COUNTY	TN	\$	2,382.81	0.00%	99.99%
REST OF USA	CAPE MAY COUNTY	NJ	\$	2,352.00	0.00%	99.99%
REST OF USA	KENOSHA COUNTY	WI	\$	2,334.76	0.00%	99.99%
REST OF USA	FAYETTE COUNTY	KY	\$	2,307.00	0.00%	99.99%
REST OF USA	MAHONING COUNTY	OH	\$	2,272.00	0.00%	99.99%
REST OF USA	SNYDER COUNTY	PA	\$	2,250.00	0.00%	99.99%
REST OF USA	FRANKLIN COUNTY	MA	\$	2,218.74	0.00%	99.99%
REST OF USA	NEW CASTLE COUNTY	DE	\$	2,200.00	0.00%	99.99%
REST OF USA	SARPY COUNTY	NE	\$	2,195.00	0.00%	99.99%
REST OF USA	DEKALB COUNTY	GA	\$	2,171.53	0.00%	99.99%
REST OF USA	MOBILE COUNTY	AL	\$	2,165.52	0.00%	99.99%
REST OF USA	WASHINGTON COUNTY	OH	\$	2,095.00	0.00%	99.99%
REST OF USA	BURKE COUNTY	NC	\$	2,054.32	0.00%	99.99%
REST OF USA	HAYS COUNTY	TX	\$	2,044.80	0.00%	99.99%
REST OF USA	NUECES COUNTY	TX	\$	2,010.62	0.00%	99.99%
REST OF USA	ADA COUNTY	ID	\$	1,980.00	0.00%	99.99%
REST OF USA	ROCK ISLAND COUNTY	IL	\$	1,977.35	0.00%	99.99%
REST OF USA	FORSYTH COUNTY	NC	\$	1,910.66	0.00%	99.99%
REST OF USA	SONOMA COUNTY	CA	\$	1,791.06	0.00%	99.99%
REST OF USA	EAGLE COUNTY	CO	\$	1,769.17	0.00%	99.99%
REST OF USA	ALLEN COUNTY	OH	\$	1,664.65	0.00%	99.99%
REST OF USA	MADISON COUNTY	IL	\$	1,605.33	0.00%	99.99%
REST OF USA	CASS COUNTY	ND	\$	1,500.00	0.00%	99.99%
REST OF USA	KENT COUNTY	RI	\$	1,415.00	0.00%	100.00%
REST OF USA	SANILAC COUNTY	MI	\$	1,392.74	0.00%	100.00%
REST OF USA	FRANKLIN COUNTY	VA	\$	1,290.13	0.00%	100.00%
REST OF USA	MOORE COUNTY	NC	\$	1,260.00	0.00%	100.00%
REST OF USA	CLINTON COUNTY	NY	\$	1,250.00	0.00%	100.00%
REST OF USA	SNOHOMISH COUNTY	WA	\$	1,225.00	0.00%	100.00%
REST OF USA	LOWNDES COUNTY	GA	\$	1,195.50	0.00%	100.00%
REST OF USA	CLINTON COUNTY	PA	\$	1,188.51	0.00%	100.00%
REST OF USA	LYCOMING COUNTY	PA	\$	1,162.66	0.00%	100.00%
REST OF USA	LORAIN COUNTY	OH	\$	1,143.00	0.00%	100.00%
REST OF USA	LEE COUNTY	MS	\$	1,133.30	0.00%	100.00%
REST OF USA	MIDDLESEX COUNTY	CT	\$	1,073.98	0.00%	100.00%
REST OF USA	FRANKLIN COUNTY	KS	\$	864.05	0.00%	100.00%
REST OF USA	CLERMONT COUNTY	OH	\$	831.84	0.00%	100.00%

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table D-5 (cont.): Prime Goods/Commodities by County
(Using Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

REST OF USA	INGHAM COUNTY	MI	\$	790.81	0.00%	100.00%
REST OF USA	WOODBURY COUNTY	IA	\$	789.00	0.00%	100.00%
REST OF USA	LITCHFIELD COUNTY	CT	\$	776.08	0.00%	100.00%
REST OF USA	BAMBERG COUNTY	SC	\$	755.00	0.00%	100.00%
REST OF USA	PENNINGTON COUNTY	MN	\$	710.26	0.00%	100.00%
REST OF USA	KENT COUNTY	MD	\$	632.51	0.00%	100.00%
REST OF USA	OLMSTED COUNTY	MN	\$	625.00	0.00%	100.00%
REST OF USA	LARIMER COUNTY	CO	\$	614.72	0.00%	100.00%
REST OF USA	ROANOKE CITY	VA	\$	610.04	0.00%	100.00%
REST OF USA	LINCOLN COUNTY	SD	\$	573.72	0.00%	100.00%
REST OF USA	BRUNSWICK COUNTY	NC	\$	544.25	0.00%	100.00%
REST OF USA	CHEROKEE COUNTY	TX	\$	477.04	0.00%	100.00%
REST OF USA	ISLAND COUNTY	WA	\$	450.00	0.00%	100.00%
REST OF USA	LANCASTER COUNTY	NE	\$	442.00	0.00%	100.00%
REST OF USA	LEE COUNTY	AL	\$	426.00	0.00%	100.00%
REST OF USA	BUTLER COUNTY	PA	\$	403.96	0.00%	100.00%
REST OF USA	CLARKE COUNTY	GA	\$	364.75	0.00%	100.00%
REST OF USA	ROCKLAND COUNTY	NY	\$	359.00	0.00%	100.00%
REST OF USA	HOWARD COUNTY	MD	\$	350.00	0.00%	100.00%
REST OF USA	TRUMBULL COUNTY	OH	\$	341.41	0.00%	100.00%
REST OF USA	MARION COUNTY	OH	\$	339.52	0.00%	100.00%
REST OF USA	PIERCE COUNTY	WA	\$	300.84	0.00%	100.00%
REST OF USA	LAWRENCE COUNTY	PA	\$	250.00	0.00%	100.00%
REST OF USA	FLOYD COUNTY	VA	\$	224.31	0.00%	100.00%
REST OF USA	BLAIR COUNTY	PA	\$	222.22	0.00%	100.00%
REST OF USA	KALAMAZOO COUNTY	MI	\$	220.00	0.00%	100.00%
REST OF USA	TRAVIS COUNTY	TX	\$	204.61	0.00%	100.00%
REST OF USA	WESTCHESTER COUNTY	NY	\$	145.00	0.00%	100.00%
REST OF USA	CATAHOULA PARISH	LA	\$	102.76	0.00%	100.00%
REST OF USA	MARSHALL COUNTY	IN	\$	59.98	0.00%	100.00%
REST OF USA	COLE COUNTY	MO	\$	54.90	0.00%	100.00%
REST OF USA	JONES COUNTY	MS	\$	54.16	0.00%	100.00%
REST OF USA	MERCER COUNTY	PA	\$	-	0.00%	100.00%

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APPENDIX E

AVAILABILITY ANALYSIS OF M/WBES

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX E: AVAILABILITY ANALYSIS OF M/WBES

Tables E-1 through E-5 present numbers for M/WBE availability corresponding to the Availability percentages in Chapter V: Quantitative Analysis. The methodology for determining Availability using the Master Vendor File for these availability tables is contained in the Quantitative Analysis chapter.

**Table E-1: Availability of Construction Firms
by Business Ownership in the Relevant Geographic Market Area
(Master Vendor File)
Palm Beach County 2025 Disparity Study**

Ethnicity of Vendor	Number of Firms	Percentage of Firms
Asian American	10	0.58%
African American	92	5.36%
Hispanic American	76	4.43%
Native American	0	0.00%
TOTAL MINORITY	178	10.37%
White Woman	48	2.80%
TOTAL M/WBE	226	13.17%
Non-M/WBE	1490	86.83%
TOTAL	1716	100.00%

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**Table E-2: Availability of Professional Services (CCNA) Firms
by Business Ownership in the Relevant Geographic Market Area
(Master Vendor File)
Palm Beach County 2025 Disparity Study**

Ethnicity of Vendor	Number of Firms	Percentage of Firms
Asian American	25	3.45%
African American	26	3.59%
Hispanic American	36	4.97%
Native American	0	0.00%
TOTAL MINORITY	87	12.00%
White Woman	25	3.45%
TOTAL M/WBE	112	15.45%
Non-M/WBE	613	84.55%
TOTAL	725	100.00%

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**Table E-3: Availability of Professional Services (Non-CCNA) Firms
by Business Ownership in the Relevant Geographic Market Area
(Master Vendor File)**

Palm Beach County 2025 Disparity Study

Ethnicity of Vendor	Number of Firms	Percentage of Firms
Asian American	16	0.67%
African American	152	6.33%
Hispanic American	48	2.00%
Native American	2	0.08%
TOTAL MINORITY	218	9.08%
White Woman	73	3.04%
TOTAL M/WBE	291	12.11%
Non-M/WBE	2111	87.89%
TOTAL	2402	100.00%

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**Table E-4: Availability of Services Firms
by Business Ownership in the Relevant Geographic Market Area
(Master Vendor File)**

Palm Beach County 2025 Disparity Study

Ethnicity of Vendor	Number of Firms	Percentage of Firms
Asian American	13	0.40%
African American	202	6.14%
Hispanic American	80	2.43%
Native American	0	0.00%
TOTAL MINORITY	295	8.97%
White Woman	61	1.86%
TOTAL M/WBE	356	10.83%
Non-M/WBE	2932	89.17%
TOTAL	3288	100.00%

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**Table E-5: Availability of Goods/Commodities Firms
by Business Ownership in the Relevant Geographic Market Area
(Master Vendor File)
Palm Beach County 2025 Disparity Study**

Ethnicity of Vendor	Number of Firms	Percentage of Firms
Asian American	11	0.53%
African American	76	3.69%
Hispanic American	37	1.80%
Native American	0	0.00%
TOTAL MINORITY	124	6.03%
White Woman	82	3.99%
TOTAL M/WBE	206	10.01%
Non-M/WBE	1851	89.99%
TOTAL	2057	100.00%

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APPENDIX F

DISPARITY INDICES

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX F: DISPARITY INDICES (PRIME, SUBCONTRACTOR, UNDER \$1 MILLION, AND UNDER \$500K)

Tables F-1 through F-5 in Appendix F present Prime Disparity Ratios by race, ethnicity, and gender for Palm Beach County projects by year over the Study Period.

Tables F-6 through F-8 present the Total Utilization Disparity Ratios by race, ethnicity, and gender on the County's projects over the Study Period.

Table F-9 presents the Subcontractor Utilization of Exempt State funded Contracts Disparity Ratios by race, ethnicity, and gender for Palm Beach County exempt contracts over the Study Period.

Tables F-10 through F-14 present Disparity Ratios for awards under \$1M, and Tables F-15 through F-19 present Disparity Ratios for awards under \$500,000.

PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table F-1: Prime Disparity Indices by Race, Gender, Ethnicity – Construction
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	1.33%	5.36%	24.77	Underutilization	*	
	Asian American	0.04%	0.58%	7.67	Underutilization	*	
	Hispanic American	2.12%	4.43%	47.96	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	3.50%	10.37%	33.71	Underutilization	*	
	White Woman	3.57%	2.80%	127.69	Overutilization		
	TOTAL M/WBE	7.07%	13.17%	53.67	Underutilization	*	
	Non-M/WBE	92.93%	86.83%	107.03	Overutilization		
2020	African American	2.45%	5.36%	45.73	Underutilization	*	
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	4.57%	4.43%	103.17	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	7.02%	10.37%	67.69	Underutilization	*	
	White Woman	2.91%	2.80%	104.01	Overutilization		
	TOTAL M/WBE	9.93%	13.17%	75.40	Underutilization	*	
	Non-M/WBE	90.07%	86.83%	103.73	Overutilization		
2021	African American	1.36%	5.36%	25.34	Underutilization	*	
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	3.37%	4.43%	76.05	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	4.73%	10.37%	45.57	Underutilization	*	
	White Woman	4.52%	2.80%	161.54	Overutilization		
	TOTAL M/WBE	9.25%	13.17%	70.20	Underutilization	*	
	Non-M/WBE	90.75%	86.83%	104.52	Overutilization		
2022	African American	4.36%	5.36%	81.26	Underutilization		
	Asian American	0.01%	0.58%	2.00	Underutilization	*	
	Hispanic American	3.36%	4.43%	75.82	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	7.73%	10.37%	74.48	Underutilization	*	
	White Woman	3.06%	2.80%	109.37	Overutilization		
	TOTAL M/WBE	10.79%	13.17%	81.89	Underutilization		
	Non-M/WBE	89.21%	86.83%	102.75	Overutilization		
2023	African American	14.96%	5.36%	278.95	Overutilization		
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	4.17%	4.43%	94.26	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	19.13%	10.37%	184.42	Overutilization		
	White Woman	6.84%	2.80%	244.38	Overutilization		
	TOTAL M/WBE	25.97%	13.17%	197.16	Overutilization		
	Non-M/WBE	74.03%	86.83%	85.26	Underutilization		
Total	African American	3.35%	5.36%	62.44	Underutilization	*	p < .05
	Asian American	0.01%	0.58%	2.03	Underutilization	*	p < .05
	Hispanic American	3.56%	4.43%	80.45	Underutilization		
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	6.92%	10.37%	66.74	Underutilization	*	p < .05
	White Woman	3.68%	2.80%	131.53	Overutilization		0
	TOTAL M/WBE	10.60%	13.17%	80.50	Underutilization		p < .05
	Non-M/WBE	89.40%	86.83%	102.96	Overutilization		0

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**Table F-2: Prime Disparity Indices by Race, Gender, Ethnicity –
Professional Services (CCNA)
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	0.03%	3.59%	0.96	Underutilization	*	
	Asian American	6.42%	3.45%	186.26	Overutilization		
	Hispanic American	3.13%	4.97%	63.11	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	9.59%	12.00%	79.93	Underutilization	*	
	White Woman	6.03%	3.45%	174.98	Overutilization		
	TOTAL M/WBE	15.63%	15.45%	101.14	Overutilization		
	Non-M/WBE	84.37%	84.55%	99.79	Underutilization		
2020	African American	0.11%	3.59%	3.01	Underutilization	*	
	Asian American	8.69%	3.45%	252.13	Overutilization		
	Hispanic American	3.63%	4.97%	73.16	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	12.43%	12.00%	103.62	Overutilization		
	White Woman	4.73%	3.45%	137.08	Overutilization		
	TOTAL M/WBE	17.16%	15.45%	111.09	Overutilization		
	Non-M/WBE	82.84%	84.55%	97.97	Underutilization		
2021	African American	0.11%	3.59%	3.17	Underutilization	*	
	Asian American	18.06%	3.45%	523.83	Overutilization		
	Hispanic American	3.32%	4.97%	66.88	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	21.50%	12.00%	179.14	Overutilization		
	White Woman	3.77%	3.45%	109.38	Overutilization		
	TOTAL M/WBE	25.27%	15.45%	163.57	Overutilization		
	Non-M/WBE	74.73%	84.55%	88.38	Underutilization		
2022	African American	0.55%	3.59%	15.27	Underutilization	*	
	Asian American	13.14%	3.45%	381.07	Overutilization		
	Hispanic American	6.28%	4.97%	126.44	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	19.97%	12.00%	166.39	Overutilization		
	White Woman	3.69%	3.45%	107.04	Overutilization		
	TOTAL M/WBE	23.66%	15.45%	153.14	Overutilization		
	Non-M/WBE	76.34%	84.55%	90.29	Underutilization		
2023	African American	0.14%	3.59%	4.02	Underutilization	*	
	Asian American	18.22%	3.45%	528.27	Overutilization		
	Hispanic American	6.73%	4.97%	135.54	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	25.09%	12.00%	209.09	Overutilization		
	White Woman	2.87%	3.45%	83.10	Underutilization		
	TOTAL M/WBE	27.96%	15.45%	180.97	Overutilization		
	Non-M/WBE	72.04%	84.55%	85.21	Underutilization		
Total	African American	0.15%	3.59%	4.23	Underutilization	*	p < .05
	Asian American	11.51%	3.45%	333.67	Overutilization		
	Hispanic American	3.96%	4.97%	79.70	Underutilization	*	FALSE
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	15.62%	12.00%	130.13	Overutilization		
	White Woman	4.53%	3.45%	131.40	Overutilization		
	TOTAL M/WBE	20.15%	15.45%	130.41	Overutilization		
	Non-M/WBE	79.85%	84.55%	94.44	Underutilization		p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table F-3: Prime Disparity Indices by Race, Gender, Ethnicity –
Professional Services (Non-CCNA)
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	0.93%	6.33%	14.77	Underutilization	*	
	Asian American	4.88%	0.67%	732.16	Overutilization		
	Hispanic American	0.70%	2.00%	35.24	Underutilization	*	
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	6.52%	9.08%	71.80	Underutilization	*	
	White Woman	0.67%	3.04%	22.13	Underutilization	*	
	TOTAL M/WBE	7.19%	12.11%	59.34	Underutilization	*	
	Non-M/WBE	92.81%	87.89%	105.61	Overutilization		
2020	African American	0.63%	6.33%	9.89	Underutilization	*	
	Asian American	3.01%	0.67%	451.46	Overutilization		
	Hispanic American	0.64%	2.00%	31.90	Underutilization	*	
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	4.27%	9.08%	47.06	Underutilization	*	
	White Woman	0.38%	3.04%	12.42	Underutilization	*	
	TOTAL M/WBE	4.65%	12.11%	38.37	Underutilization	*	
	Non-M/WBE	95.35%	87.89%	108.50	Overutilization		
2021	African American	0.39%	6.33%	6.12	Underutilization	*	
	Asian American	3.78%	0.67%	567.71	Overutilization		
	Hispanic American	0.66%	2.00%	33.22	Underutilization	*	
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	4.83%	9.08%	53.25	Underutilization	*	
	White Woman	0.30%	3.04%	9.87	Underutilization	*	
	TOTAL M/WBE	5.13%	12.11%	42.37	Underutilization	*	
	Non-M/WBE	94.87%	87.89%	107.94	Overutilization		
2022	African American	6.45%	6.33%	101.87	Overutilization		
	Asian American	8.45%	0.67%	1268.03	Overutilization		
	Hispanic American	2.73%	2.00%	136.76	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	17.63%	9.08%	194.21	Overutilization		
	White Woman	1.21%	3.04%	39.83	Underutilization	*	
	TOTAL M/WBE	18.84%	12.11%	155.48	Overutilization		
	Non-M/WBE	81.16%	87.89%	92.35	Underutilization		
2023	African American	0.27%	6.33%	4.30	Underutilization	*	
	Asian American	0.53%	0.67%	79.81	Underutilization	*	
	Hispanic American	0.12%	2.00%	5.78	Underutilization	*	
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	0.92%	9.08%	10.13	Underutilization	*	
	White Woman	0.03%	3.04%	0.95	Underutilization	*	
	TOTAL M/WBE	0.95%	12.11%	7.83	Underutilization	*	
	Non-M/WBE	99.05%	87.89%	112.71	Overutilization		
Total	African American	0.77%	6.33%	12.24	Underutilization	*	p < .05
	Asian American	3.08%	0.67%	462.70	Overutilization		
	Hispanic American	0.61%	2.00%	30.39	Underutilization	*	p < .05
	Native American	0.00%	0.08%	0.00	Underutilization	*	FALSE
	TOTAL MINORITY	4.46%	9.08%	49.18	Underutilization	*	p < .05
	White Woman	0.36%	3.04%	11.86	Underutilization	*	p < .05
	TOTAL M/WBE	4.82%	12.11%	39.82	Underutilization	*	p < .05
	Non-M/WBE	95.18%	87.89%	108.30	Overutilization		

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Table F-4: Prime Disparity Indices by Race, Gender, Ethnicity – Services
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	2.63%	6.14%	42.86	Underutilization	*	
	Asian American	0.27%	0.40%	68.78	Underutilization	*	
	Hispanic American	9.30%	2.43%	382.27	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	12.21%	8.97%	136.05	Overutilization		
	White Woman	15.03%	1.86%	810.17	Overutilization		
	TOTAL M/WBE	27.24%	10.83%	251.56	Overutilization		
	Non-M/WBE	72.76%	89.17%	81.60	Underutilization		
2020	African American	1.98%	6.14%	32.20	Underutilization	*	
	Asian American	0.34%	0.40%	86.30	Underutilization		
	Hispanic American	9.13%	2.43%	375.31	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	11.45%	8.97%	127.63	Overutilization		
	White Woman	16.69%	1.86%	899.69	Overutilization		
	TOTAL M/WBE	28.14%	10.83%	259.92	Overutilization		
	Non-M/WBE	71.86%	89.17%	80.58	Underutilization		
2021	African American	1.88%	6.14%	30.60	Underutilization	*	
	Asian American	0.32%	0.40%	80.25	Underutilization		
	Hispanic American	10.41%	2.43%	427.71	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	12.60%	8.97%	140.48	Overutilization		
	White Woman	14.84%	1.86%	799.78	Overutilization		
	TOTAL M/WBE	27.44%	10.83%	253.45	Overutilization		
	Non-M/WBE	72.56%	89.17%	81.37	Underutilization		
2022	African American	1.25%	6.14%	20.41	Underutilization	*	
	Asian American	0.08%	0.40%	19.32	Underutilization	*	
	Hispanic American	11.04%	2.43%	453.88	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	12.37%	8.97%	137.91	Overutilization		
	White Woman	12.13%	1.86%	653.68	Overutilization		
	TOTAL M/WBE	24.50%	10.83%	226.29	Overutilization		
	Non-M/WBE	75.50%	89.17%	84.67	Underutilization		
2023	African American	0.54%	6.14%	8.76	Underutilization	*	
	Asian American	0.41%	0.40%	104.41	Overutilization		
	Hispanic American	8.20%	2.43%	336.98	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	9.15%	8.97%	101.98	Overutilization		
	White Woman	14.86%	1.86%	800.81	Overutilization		
	TOTAL M/WBE	24.01%	10.83%	221.73	Overutilization		
	Non-M/WBE	75.99%	89.17%	85.22	Underutilization		
Total	African American	1.88%	6.14%	30.63	Underutilization	*	p < .05
	Asian American	0.27%	0.40%	69.45	Underutilization	*	FALSE
	Hispanic American	9.75%	2.43%	400.60	Overutilization		
	Native American	0.00%	0.00%	- n/a			-
	TOTAL MINORITY	11.90%	8.97%	132.67	Overutilization		
	White Woman	14.96%	1.86%	806.46	Overutilization		
	TOTAL M/WBE	26.87%	10.83%	248.12	Overutilization		
	Non-M/WBE	73.13%	89.17%	82.01	Underutilization		p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table F-5: Prime Disparity Indices by Race, Gender, Ethnicity – Goods/Commodities
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	0.02%	3.69%	0.41	Underutilization	*	
	Asian American	2.17%	0.53%	406.71	Overutilization		
	Hispanic American	0.81%	1.80%	44.92	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	3.00%	6.03%	49.74	Underutilization	*	
	White Woman	0.50%	3.99%	12.66	Underutilization	*	
	TOTAL M/WBE	3.50%	10.01%	34.98	Underutilization	*	
	Non-M/WBE	96.50%	89.99%	107.24	Overutilization		
2020	African American	0.05%	3.69%	1.27	Underutilization	*	
	Asian American	3.30%	0.53%	616.91	Overutilization		
	Hispanic American	1.23%	1.80%	68.22	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	4.57%	6.03%	75.86	Underutilization	*	
	White Woman	1.37%	3.99%	34.36	Underutilization	*	
	TOTAL M/WBE	5.94%	10.01%	59.34	Underutilization	*	
	Non-M/WBE	94.06%	89.99%	104.52	Overutilization		
2021	African American	0.11%	3.69%	2.94	Underutilization	*	
	Asian American	3.43%	0.53%	640.86	Overutilization		
	Hispanic American	1.54%	1.80%	85.60	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	5.08%	6.03%	84.20	Underutilization		
	White Woman	1.88%	3.99%	47.10	Underutilization	*	
	TOTAL M/WBE	6.95%	10.01%	69.43	Underutilization	*	
	Non-M/WBE	93.05%	89.99%	103.40	Overutilization		
2022	African American	0.05%	3.69%	1.40	Underutilization	*	
	Asian American	2.25%	0.53%	421.35	Overutilization		
	Hispanic American	1.53%	1.80%	85.30	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	3.84%	6.03%	63.69	Underutilization	*	
	White Woman	1.47%	3.99%	36.90	Underutilization	*	
	TOTAL M/WBE	5.31%	10.01%	53.03	Underutilization	*	
	Non-M/WBE	94.69%	89.99%	105.23	Overutilization		
2023	African American	0.17%	3.69%	4.54	Underutilization	*	
	Asian American	2.94%	0.53%	549.90	Overutilization		
	Hispanic American	0.51%	1.80%	28.28	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	3.62%	6.03%	60.00	Underutilization	*	
	White Woman	3.39%	3.99%	85.00	Underutilization		
	TOTAL M/WBE	7.01%	10.01%	69.95	Underutilization	*	
	Non-M/WBE	92.99%	89.99%	103.34	Overutilization		
Total	African American	0.05%	3.69%	1.45	Underutilization	*	p < .05
	Asian American	2.75%	0.53%	514.81	Overutilization		
	Hispanic American	1.16%	1.80%	64.48	Underutilization	*	FALSE
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	3.97%	6.03%	65.80	Underutilization	*	p < .05
	White Woman	1.30%	3.99%	32.50	Underutilization	*	p < .05
	TOTAL M/WBE	5.26%	10.01%	52.54	Underutilization	*	p < .05
	Non-M/WBE	94.74%	89.99%	105.28	Overutilization		

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table F-6: Total Utilization Disparity Indices by Race, Gender, Ethnicity – Construction
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Calendar Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	1.15%	5.36%	21.51	Underutilization	*	
	Asian American	0.05%	0.58%	9.19	Underutilization	*	
	Hispanic American	2.59%	4.43%	58.54	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	3.80%	10.37%	36.63	Underutilization	*	
	White Woman	4.45%	2.80%	159.20	Overutilization		
	TOTAL M/WBE	8.25%	13.17%	62.66	Underutilization	*	
	Non-M/WBE	91.75%	86.83%	105.66	Overutilization		
2020	African American	2.36%	5.36%	44.06	Underutilization	*	
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	4.41%	4.43%	99.51	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	6.77%	10.37%	65.26	Underutilization	*	
	White Woman	3.00%	2.80%	107.31	Overutilization		
	TOTAL M/WBE	9.77%	13.17%	74.19	Underutilization	*	
	Non-M/WBE	90.23%	86.83%	103.91	Overutilization		
2021	African American	0.55%	5.36%	10.31	Underutilization	*	
	Asian American	0.21%	0.58%	36.51	Underutilization	*	
	Hispanic American	4.55%	4.43%	102.78	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	5.32%	10.37%	51.26	Underutilization	*	
	White Woman	6.56%	2.80%	234.54	Overutilization		
	TOTAL M/WBE	11.88%	13.17%	90.19	Underutilization		
	Non-M/WBE	88.12%	86.83%	101.49	Overutilization		
2022	African American	3.96%	5.36%	73.83	Underutilization	*	
	Asian American	0.11%	0.58%	19.65	Underutilization	*	
	Hispanic American	8.54%	4.43%	192.92	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	12.62%	10.37%	121.63	Overutilization		
	White Woman	6.87%	2.80%	245.53	Overutilization		
	TOTAL M/WBE	19.48%	13.17%	147.95	Overutilization		
	Non-M/WBE	80.52%	86.83%	92.73	Underutilization		
2023	African American	1.67%	5.36%	31.22	Underutilization	*	
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	12.73%	4.43%	287.52	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	14.41%	10.37%	138.90	Overutilization		
	White Woman	11.97%	2.80%	427.94	Overutilization		
	TOTAL M/WBE	26.38%	13.17%	200.29	Overutilization		
	Non-M/WBE	73.62%	86.83%	84.79	Underutilization		
Total	African American	2.02%	5.36%	37.75	Underutilization	*	p < .05
	Asian American	0.07%	0.58%	12.39	Underutilization	*	p < .05
	Hispanic American	5.48%	4.43%	123.79	Overutilization		0
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	7.58%	10.37%	73.06	Underutilization	*	p < .05
	White Woman	5.40%	2.80%	193.03	Overutilization		0
	TOTAL M/WBE	12.98%	13.17%	98.54	Underutilization		
	Non-M/WBE	87.02%	86.83%	100.22	Overutilization		

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table F-7: Total Utilization Disparity Indices by Race, Gender, Ethnicity – Professional Services (CCNA)
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Calendar Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	2.89%	3.59%	80.64	Underutilization		
	Asian American	7.48%	3.45%	216.93	Overutilization		
	Hispanic American	2.99%	4.97%	60.17	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	13.36%	12.00%	111.33	Overutilization		
	White Woman	5.26%	3.45%	152.50	Overutilization		
	TOTAL M/WBE	18.62%	15.45%	120.52	Overutilization		
	Non-M/WBE	81.38%	84.55%	96.25	Underutilization		
2020	African American	4.47%	3.59%	124.73	Overutilization		
	Asian American	8.39%	3.45%	243.45	Overutilization		
	Hispanic American	4.04%	4.97%	81.30	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	16.90%	12.00%	140.87	Overutilization		
	White Woman	4.48%	3.45%	130.05	Overutilization		
	TOTAL M/WBE	21.39%	15.45%	138.45	Overutilization		
	Non-M/WBE	78.61%	84.55%	92.97	Underutilization		
2021	African American	6.19%	3.59%	172.55	Overutilization		
	Asian American	18.22%	3.45%	528.34	Overutilization		
	Hispanic American	4.01%	4.97%	80.70	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	28.41%	12.00%	236.78	Overutilization		
	White Woman	3.77%	3.45%	109.30	Overutilization		
	TOTAL M/WBE	32.18%	15.45%	208.33	Overutilization		
	Non-M/WBE	67.82%	84.55%	80.21	Underutilization		
2022	African American	12.54%	3.59%	349.60	Overutilization		
	Asian American	13.06%	3.45%	378.60	Overutilization		
	Hispanic American	7.96%	4.97%	160.29	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	33.55%	12.00%	279.60	Overutilization		
	White Woman	3.90%	3.45%	113.14	Overutilization		
	TOTAL M/WBE	37.45%	15.45%	242.44	Overutilization		
	Non-M/WBE	62.55%	84.55%	73.98	Underutilization	*	
2023	African American	13.76%	3.59%	383.57	Overutilization		
	Asian American	12.60%	3.45%	365.54	Overutilization		
	Hispanic American	14.05%	4.97%	283.01	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	40.41%	12.00%	336.78	Overutilization		
	White Woman	0.63%	3.45%	18.13	Underutilization	*	
	TOTAL M/WBE	41.04%	15.45%	265.65	Overutilization		
	Non-M/WBE	58.96%	84.55%	69.73	Underutilization	*	
Total	African American	6.07%	3.59%	169.18	Overutilization		
	Asian American	11.32%	3.45%	328.38	Overutilization		
	Hispanic American	4.85%	4.97%	97.62	Underutilization		FALSE
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	22.24%	12.00%	185.32	Overutilization		
	White Woman	4.19%	3.45%	121.52	Overutilization		FALSE
	TOTAL M/WBE	26.43%	15.45%	171.08	Overutilization		
	Non-M/WBE	73.57%	84.55%	87.01	Underutilization		p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table F-8: Total Utilization Disparity Indices by Race, Gender, Ethnicity – Services
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Calendar Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	2.63%	6.14%	42.86	Underutilization	*	
	Asian American	0.27%	0.40%	68.78	Underutilization	*	
	Hispanic American	9.74%	2.43%	400.12	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	12.64%	8.97%	140.89	Overutilization		
	White Woman	15.03%	1.86%	810.17	Overutilization		
	TOTAL M/WBE	27.67%	10.83%	255.57	Overutilization		
2020	Non-M/WBE	72.33%	89.17%	81.11	Underutilization		
	African American	1.98%	6.14%	32.20	Underutilization	*	
	Asian American	0.34%	0.40%	86.30	Underutilization		
	Hispanic American	9.13%	2.43%	375.31	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	11.45%	8.97%	127.63	Overutilization		
	White Woman	16.69%	1.86%	899.69	Overutilization		
2021	TOTAL M/WBE	28.14%	10.83%	259.92	Overutilization		
	Non-M/WBE	71.86%	89.17%	80.58	Underutilization		
	African American	1.88%	6.14%	30.60	Underutilization	*	
	Asian American	0.32%	0.40%	80.25	Underutilization		
	Hispanic American	13.50%	2.43%	555.00	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	15.70%	8.97%	175.00	Overutilization		
2022	White Woman	14.84%	1.86%	799.78	Overutilization		
	TOTAL M/WBE	30.54%	10.83%	282.06	Overutilization		
	Non-M/WBE	69.46%	89.17%	77.90	Underutilization	*	
	African American	1.25%	6.14%	20.41	Underutilization	*	
	Asian American	0.08%	0.40%	19.32	Underutilization	*	
	Hispanic American	12.88%	2.43%	529.24	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
2023	TOTAL MINORITY	14.21%	8.97%	158.35	Overutilization		
	White Woman	12.13%	1.86%	653.68	Overutilization		
	TOTAL M/WBE	26.33%	10.83%	243.22	Overutilization		
	Non-M/WBE	73.67%	89.17%	82.61	Underutilization		
	African American	0.54%	6.14%	8.76	Underutilization	*	
	Asian American	0.41%	0.40%	104.41	Overutilization		
	Hispanic American	8.32%	2.43%	341.75	Overutilization		
Total	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	9.27%	8.97%	103.28	Overutilization		
	White Woman	14.86%	1.86%	800.81	Overutilization		
	TOTAL M/WBE	24.12%	10.83%	222.80	Overutilization		
	Non-M/WBE	75.88%	89.17%	85.09	Underutilization		
	African American	1.88%	6.14%	30.63	Underutilization	*	p < .05
	Asian American	0.27%	0.40%	69.45	Underutilization	*	FALSE
	Hispanic American	10.85%	2.43%	445.87	Overutilization		
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	13.00%	8.97%	144.95	Overutilization		
	White Woman	14.96%	1.86%	806.46	Overutilization		
	TOTAL M/WBE	27.97%	10.83%	258.30	Overutilization		
	Non-M/WBE	72.03%	89.17%	80.78	Underutilization		p < .05

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**Table F-9: Subcontractor Utilization of Exempt State Contracts Disparity Indices
by Race, Gender, Ethnicity
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Industry Category	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
Construction	African American	0.00%	5.36%	0.00	Underutilization	*	p < .05
	Asian American	0.00%	0.58%	0.00	Underutilization	*	p < .05
	Hispanic American	6.25%	4.43%	141.07	Overutilization		0
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	6.25%	10.37%	60.23	Underutilization	*	p < .05
	White Woman	26.92%	2.80%	962.28	Overutilization		0
	TOTAL M/WBE	33.16%	13.17%	251.82	Overutilization		0
	Non-M/WBE	66.84%	86.83%	76.97	Underutilization	*	p < .05
Professional Services (CCNA)	African American	0.00%	3.59%	0.00	Underutilization	*	p < .05
	Asian American	0.92%	3.45%	26.61	Underutilization	*	p < .05
	Hispanic American	2.39%	4.97%	48.05	Underutilization	*	p < .05
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	3.30%	12.00%	27.53	Underutilization	*	p < .05
	White Woman	1.21%	3.45%	35.17	Underutilization	*	p < .05
	TOTAL M/WBE	4.52%	15.45%	29.24	Underutilization	*	p < .05
	Non-M/WBE	95.48%	84.55%	112.93	Overutilization		

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table F-10: Prime Disparity by Race, Gender, Ethnicity – Construction
(Using Local Award Dollars Less than \$1M, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	4.36%	5.36%	81.26	Underutilization		
	Asian American	0.04%	0.58%	6.43	Underutilization	*	
	Hispanic American	2.22%	4.43%	50.13	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	6.61%	10.37%	63.77	Underutilization	*	
	White Woman	3.68%	2.80%	131.70	Overutilization		
	TOTAL M/WBE	10.30%	13.17%	78.19	Underutilization	*	
	Non-M/WBE	89.70%	86.83%	103.31	Overutilization		
2020	African American	2.77%	5.36%	51.60	Underutilization	*	
	Asian American	0.01%	0.58%	2.52	Underutilization	*	
	Hispanic American	0.89%	4.43%	20.07	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	3.67%	10.37%	35.38	Underutilization	*	
	White Woman	5.96%	2.80%	213.11	Overutilization		
	TOTAL M/WBE	9.63%	13.17%	73.13	Underutilization	*	
	Non-M/WBE	90.37%	86.83%	104.08	Overutilization		
2021	African American	2.39%	5.36%	44.54	Underutilization	*	
	Asian American	0.02%	0.58%	2.95	Underutilization	*	
	Hispanic American	3.81%	4.43%	85.95	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	6.21%	10.37%	59.89	Underutilization	*	
	White Woman	6.28%	2.80%	224.67	Overutilization		
	TOTAL M/WBE	12.50%	13.17%	94.88	Underutilization		
	Non-M/WBE	87.50%	86.83%	100.78	Overutilization		
2022	African American	3.88%	5.36%	72.29	Underutilization	*	
	Asian American	0.01%	0.58%	0.90	Underutilization	*	
	Hispanic American	1.72%	4.43%	38.73	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	5.60%	10.37%	53.95	Underutilization	*	
	White Woman	6.27%	2.80%	224.10	Overutilization		
	TOTAL M/WBE	11.86%	13.17%	90.09	Underutilization		
	Non-M/WBE	88.14%	86.83%	101.50	Overutilization		
2023	African American	5.42%	5.36%	101.02	Overutilization		
	Asian American	0.01%	0.58%	1.34	Underutilization	*	
	Hispanic American	4.02%	4.43%	90.87	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	9.45%	10.37%	91.08	Underutilization		
	White Woman	4.15%	2.80%	148.45	Overutilization		
	TOTAL M/WBE	13.60%	13.17%	103.27	Overutilization		
	Non-M/WBE	86.40%	86.83%	99.50	Underutilization		
Total	African American	3.73%	5.36%	69.57	Underutilization	*	p < .05
	Asian American	0.02%	0.58%	2.82	Underutilization	*	p < .05
	Hispanic American	2.45%	4.43%	55.24	Underutilization	*	p < .05
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	6.19%	10.37%	59.70	Underutilization	*	p < .05
	White Woman	5.28%	2.80%	188.80	Overutilization		0
	TOTAL M/WBE	11.47%	13.17%	87.12	Underutilization		p < .05
	Non-M/WBE	88.53%	86.83%	101.95	Overutilization		0

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Table F-11: Prime Disparity by Race, Gender, Ethnicity – Professional Services (CCNA)
(Using Local Award Dollars Less than \$1M, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	0.53%	3.59%	14.83	Underutilization	*	
	Asian American	27.72%	3.45%	804.01	Overutilization		
	Hispanic American	7.66%	4.97%	154.21	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	35.91%	12.00%	299.28	Overutilization		
	White Woman	3.32%	3.45%	96.15	Underutilization		
	TOTAL M/WBE	39.23%	15.45%	253.94	Overutilization		
	Non-M/WBE	60.77%	84.55%	71.87	Underutilization	*	
2020	African American	0.06%	3.59%	1.63	Underutilization	*	
	Asian American	8.34%	3.45%	241.84	Overutilization		
	Hispanic American	9.22%	4.97%	185.75	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	17.62%	12.00%	146.84	Overutilization		
	White Woman	2.99%	3.45%	86.60	Underutilization		
	TOTAL M/WBE	20.61%	15.45%	133.40	Overutilization		
	Non-M/WBE	79.39%	84.55%	93.90	Underutilization		
2021	African American	0.64%	3.59%	17.82	Underutilization	*	
	Asian American	32.34%	3.45%	937.74	Overutilization		
	Hispanic American	13.10%	4.97%	263.86	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	46.08%	12.00%	383.98	Overutilization		
	White Woman	2.41%	3.45%	69.96	Underutilization	*	
	TOTAL M/WBE	48.49%	15.45%	313.88	Overutilization		
	Non-M/WBE	51.51%	84.55%	60.92	Underutilization	*	
2022	African American	4.65%	3.59%	129.75	Overutilization		
	Asian American	18.57%	3.45%	538.51	Overutilization		
	Hispanic American	9.25%	4.97%	186.26	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	32.47%	12.00%	270.59	Overutilization		
	White Woman	3.55%	3.45%	102.90	Overutilization		
	TOTAL M/WBE	36.02%	15.45%	233.16	Overutilization		
	Non-M/WBE	63.98%	84.55%	75.67	Underutilization	*	
2023	African American	3.50%	3.59%	97.52	Underutilization		
	Asian American	11.00%	3.45%	318.94	Overutilization		
	Hispanic American	15.87%	4.97%	319.66	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	30.37%	12.00%	253.07	Overutilization		
	White Woman	5.27%	3.45%	152.72	Overutilization		
	TOTAL M/WBE	35.63%	15.45%	230.67	Overutilization		
	Non-M/WBE	64.37%	84.55%	76.13	Underutilization	*	
Total	African American	1.77%	3.59%	49.25	Underutilization	*	p < .05
	Asian American	20.01%	3.45%	580.21	Overutilization		
	Hispanic American	10.96%	4.97%	220.64	Overutilization		
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	32.73%	12.00%	272.74	Overutilization		
	White Woman	3.36%	3.45%	97.39	Underutilization		FALSE
	TOTAL M/WBE	36.09%	15.45%	233.60	Overutilization		
	Non-M/WBE	63.91%	84.55%	75.59	Underutilization	*	p < .05

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**Table F-12: Prime Disparity by Race, Gender, Ethnicity –
Professional Services (Non-CCNA)
(Using Local Award Dollars Less than \$1M, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	1.41%	6.33%	22.31	Underutilization	*	
	Asian American	21.50%	0.67%	3227.03	Overutilization		
	Hispanic American	2.18%	2.00%	109.28	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	25.09%	9.08%	276.46	Overutilization		
	White Woman	0.73%	3.04%	23.97	Underutilization	*	
	TOTAL M/WBE	25.82%	12.11%	213.12	Overutilization		
	Non-M/WBE	74.18%	87.89%	84.41	Underutilization		
2020	African American	1.20%	6.33%	18.89	Underutilization	*	
	Asian American	16.91%	0.67%	2538.59	Overutilization		
	Hispanic American	3.86%	2.00%	193.41	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	21.97%	9.08%	242.07	Overutilization		
	White Woman	1.93%	3.04%	63.52	Underutilization	*	
	TOTAL M/WBE	23.90%	12.11%	197.28	Overutilization		
	Non-M/WBE	76.10%	87.89%	86.59	Underutilization		
2021	African American	1.22%	6.33%	19.22	Underutilization	*	
	Asian American	24.71%	0.67%	3709.10	Overutilization		
	Hispanic American	4.20%	2.00%	210.40	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	30.13%	9.08%	331.96	Overutilization		
	White Woman	1.64%	3.04%	53.94	Underutilization	*	
	TOTAL M/WBE	31.77%	12.11%	262.21	Overutilization		
	Non-M/WBE	68.23%	87.89%	77.64	Underutilization	*	
2022	African American	5.71%	6.33%	90.17	Underutilization		
	Asian American	14.50%	0.67%	2176.78	Overutilization		
	Hispanic American	5.15%	2.00%	257.95	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	25.36%	9.08%	279.43	Overutilization		
	White Woman	0.79%	3.04%	26.05	Underutilization	*	
	TOTAL M/WBE	26.15%	12.11%	215.87	Overutilization		
	Non-M/WBE	73.85%	87.89%	84.03	Underutilization		
2023	African American	25.14%	6.33%	397.24	Overutilization		
	Asian American	25.88%	0.67%	3885.38	Overutilization		
	Hispanic American	5.31%	2.00%	265.59	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	56.33%	9.08%	620.62	Overutilization		
	White Woman	1.57%	3.04%	51.56	Underutilization	*	
	TOTAL M/WBE	57.89%	12.11%	477.86	Overutilization		
	Non-M/WBE	42.11%	87.89%	47.91	Underutilization	*	
Total	African American	5.93%	6.33%	93.75	Underutilization		FALSE
	Asian American	20.73%	0.67%	3112.05	Overutilization		
	Hispanic American	3.92%	2.00%	196.36	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	FALSE
	TOTAL MINORITY	30.59%	9.08%	337.01	Overutilization		
	White Woman	1.30%	3.04%	42.76	Underutilization	*	p < .05
	TOTAL M/WBE	31.89%	12.11%	263.20	Overutilization		
	Non-M/WBE	68.11%	87.89%	77.50	Underutilization	*	p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table F-13: Prime Disparity by Race, Gender, Ethnicity –Services
(Using Local Award Dollars Less than \$1M, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	5.59%	6.14%	90.96	Underutilization		
	Asian American	0.79%	0.40%	200.58	Overutilization		
	Hispanic American	8.67%	2.43%	356.15	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	15.05%	8.97%	167.70	Overutilization		
	White Woman	8.81%	1.86%	474.66	Overutilization		
	TOTAL M/WBE	23.85%	10.83%	220.30	Overutilization		
	Non-M/WBE	76.15%	89.17%	85.39	Underutilization		
2020	African American	3.44%	6.14%	56.00	Underutilization	*	
	Asian American	0.48%	0.40%	121.11	Overutilization		
	Hispanic American	12.44%	2.43%	511.47	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	16.36%	8.97%	182.39	Overutilization		
	White Woman	9.31%	1.86%	501.81	Overutilization		
	TOTAL M/WBE	25.67%	10.83%	237.12	Overutilization		
	Non-M/WBE	74.33%	89.17%	83.35	Underutilization		
2021	African American	2.76%	6.14%	44.93	Underutilization	*	
	Asian American	0.21%	0.40%	52.45	Underutilization	*	
	Hispanic American	9.25%	2.43%	380.34	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	12.22%	8.97%	136.22	Overutilization		
	White Woman	8.71%	1.86%	469.50	Overutilization		
	TOTAL M/WBE	20.93%	10.83%	193.33	Overutilization		
	Non-M/WBE	79.07%	89.17%	88.67	Underutilization		
2022	African American	2.42%	6.14%	39.46	Underutilization	*	
	Asian American	0.48%	0.40%	121.53	Overutilization		
	Hispanic American	11.99%	2.43%	492.72	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	14.89%	8.97%	166.00	Overutilization		
	White Woman	9.39%	1.86%	506.19	Overutilization		
	TOTAL M/WBE	24.28%	10.83%	224.29	Overutilization		
	Non-M/WBE	75.72%	89.17%	84.91	Underutilization		
2023	African American	1.12%	6.14%	18.22	Underutilization	*	
	Asian American	0.81%	0.40%	205.57	Overutilization		
	Hispanic American	12.04%	2.43%	494.65	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	13.97%	8.97%	155.68	Overutilization		
	White Woman	9.99%	1.86%	538.31	Overutilization		
	TOTAL M/WBE	23.95%	10.83%	221.24	Overutilization		
	Non-M/WBE	76.05%	89.17%	85.28	Underutilization		
Total	African American	3.08%	6.14%	50.09	Underutilization	*	p < .05
	Asian American	0.54%	0.40%	136.86	Overutilization		FALSE
	Hispanic American	10.82%	2.43%	444.86	Overutilization		
	Native American	0.00%	0.00%	- n/a			-
	TOTAL MINORITY	14.44%	8.97%	160.97	Overutilization		
	White Woman	9.22%	1.86%	496.92	Overutilization		
	TOTAL M/WBE	23.66%	10.83%	218.53	Overutilization		
	Non-M/WBE	76.34%	89.17%	85.61	Underutilization		p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table F-14: Prime Disparity by Race, Gender, Ethnicity – Goods/Commodities
(Using Local Award Dollars Less than \$1M, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	0.02%	3.69%	0.43	Underutilization	*	
	Asian American	3.02%	0.53%	565.61	Overutilization		
	Hispanic American	1.13%	1.80%	63.07	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	4.17%	6.03%	69.26	Underutilization	*	
	White Woman	0.90%	3.99%	22.45	Underutilization	*	
	TOTAL M/WBE	5.07%	10.01%	50.63	Underutilization	*	
	Non-M/WBE	94.93%	89.99%	105.49	Overutilization		
2020	African American	1.29%	3.69%	34.96	Underutilization	*	
	Asian American	2.38%	0.53%	445.87	Overutilization		
	Hispanic American	1.02%	1.80%	56.54	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	4.69%	6.03%	77.85	Underutilization	*	
	White Woman	1.02%	3.99%	25.69	Underutilization	*	
	TOTAL M/WBE	5.72%	10.01%	57.09	Underutilization	*	
	Non-M/WBE	94.28%	89.99%	104.78	Overutilization		
2021	African American	0.95%	3.69%	25.73	Underutilization	*	
	Asian American	2.11%	0.53%	394.53	Overutilization		
	Hispanic American	1.06%	1.80%	59.13	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	4.12%	6.03%	68.41	Underutilization	*	
	White Woman	1.83%	3.99%	45.78	Underutilization	*	
	TOTAL M/WBE	5.95%	10.01%	59.40	Underutilization	*	
	Non-M/WBE	94.05%	89.99%	104.52	Overutilization		
2022	African American	0.11%	3.69%	3.07	Underutilization	*	
	Asian American	1.93%	0.53%	360.24	Overutilization		
	Hispanic American	1.78%	1.80%	98.80	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	3.82%	6.03%	63.32	Underutilization	*	
	White Woman	1.77%	3.99%	44.38	Underutilization	*	
	TOTAL M/WBE	5.59%	10.01%	55.78	Underutilization	*	
	Non-M/WBE	94.41%	89.99%	104.92	Overutilization		
2023	African American	0.59%	3.69%	16.06	Underutilization	*	
	Asian American	2.88%	0.53%	539.00	Overutilization		
	Hispanic American	2.11%	1.80%	117.54	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	5.59%	6.03%	92.73	Underutilization		
	White Woman	5.36%	3.99%	134.51	Overutilization		
	TOTAL M/WBE	10.95%	10.01%	109.36	Overutilization		
	Non-M/WBE	89.05%	89.99%	98.96	Underutilization		
Total	African American	0.64%	3.69%	17.31	Underutilization	*	p < .05
	Asian American	2.43%	0.53%	455.10	Overutilization		
	Hispanic American	1.39%	1.80%	77.05	Underutilization	*	FALSE
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	4.46%	6.03%	73.97	Underutilization	*	p < .05
	White Woman	2.10%	3.99%	52.56	Underutilization	*	p < .05
	TOTAL M/WBE	6.55%	10.01%	65.45	Underutilization	*	p < .05
	Non-M/WBE	93.45%	89.99%	103.85	Overutilization		

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Table F-15: Prime Disparity by Race, Gender, Ethnicity – Construction
(Using Local Award Dollars Less than \$500k, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	5.98%	5.36%	111.52	Overutilization		
	Asian American	0.05%	0.58%	8.82	Underutilization	*	
	Hispanic American	3.05%	4.43%	68.80	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	9.08%	10.37%	87.51	Underutilization		
	White Woman	3.48%	2.80%	124.35	Overutilization		
	TOTAL M/WBE	12.56%	13.17%	95.34	Underutilization		
2020	Non-M/WBE	87.44%	86.83%	100.71	Overutilization		
	African American	2.34%	5.36%	43.55	Underutilization	*	
	Asian American	0.02%	0.58%	3.41	Underutilization	*	
	Hispanic American	1.20%	4.43%	27.14	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	3.56%	10.37%	34.29	Underutilization	*	
	White Woman	6.41%	2.80%	229.07	Overutilization		
2021	TOTAL M/WBE	9.96%	13.17%	75.66	Underutilization	*	
	Non-M/WBE	90.04%	86.83%	103.69	Overutilization		
	African American	3.15%	5.36%	58.68	Underutilization	*	
	Asian American	0.02%	0.58%	3.89	Underutilization	*	
	Hispanic American	3.63%	4.43%	81.94	Underutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	6.80%	10.37%	65.53	Underutilization	*	
2022	White Woman	6.57%	2.80%	235.03	Overutilization		
	TOTAL M/WBE	13.37%	13.17%	101.53	Overutilization		
	Non-M/WBE	86.63%	86.83%	99.77	Underutilization		
	African American	3.15%	5.36%	58.67	Underutilization	*	
	Asian American	0.01%	0.58%	1.25	Underutilization	*	
	Hispanic American	2.39%	4.43%	53.96	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
2023	TOTAL MINORITY	5.54%	10.37%	53.43	Underutilization	*	
	White Woman	7.17%	2.80%	256.40	Overutilization		
	TOTAL M/WBE	12.71%	13.17%	96.54	Underutilization		
	Non-M/WBE	87.29%	86.83%	100.52	Overutilization		
	African American	7.05%	5.36%	131.58	Overutilization		
	Asian American	0.01%	0.58%	1.74	Underutilization	*	
	Hispanic American	2.11%	4.43%	47.73	Underutilization	*	
Total	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	9.18%	10.37%	88.49	Underutilization		
	White Woman	5.41%	2.80%	193.37	Overutilization		
	TOTAL M/WBE	14.59%	13.17%	110.76	Overutilization		
	Non-M/WBE	85.41%	86.83%	98.37	Underutilization		
	African American	4.28%	5.36%	79.85	Underutilization	*	
	Asian American	0.02%	0.58%	3.80	Underutilization	*	p <.05
	Hispanic American	2.40%	4.43%	54.16	Underutilization	*	p <.05
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	6.70%	10.37%	64.61	Underutilization	*	p <.05
	White Woman	5.82%	2.80%	207.95	Overutilization		0
	TOTAL M/WBE	12.52%	13.17%	95.05	Underutilization		
	Non-M/WBE	87.48%	86.83%	100.75	Overutilization		

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table F-16: Prime Disparity by Race, Gender, Ethnicity – Professional Services (CCNA)
(Using Local Award Dollars Less than \$500k, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	0.62%	3.59%	17.41	Underutilization	*	
	Asian American	15.13%	3.45%	438.85	Overutilization		
	Hispanic American	8.99%	4.97%	181.07	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	24.75%	12.00%	206.24	Overutilization		
	White Woman	3.89%	3.45%	112.90	Overutilization		
	TOTAL M/WBE	28.64%	15.45%	185.40	Overutilization		
	Non-M/WBE	71.36%	84.55%	84.40	Underutilization		
2020	African American	0.07%	3.59%	1.97	Underutilization	*	
	Asian American	10.08%	3.45%	292.29	Overutilization		
	Hispanic American	11.15%	4.97%	224.51	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	21.30%	12.00%	177.48	Overutilization		
	White Woman	3.61%	3.45%	104.66	Overutilization		
	TOTAL M/WBE	24.91%	15.45%	161.23	Overutilization		
	Non-M/WBE	75.09%	84.55%	88.81	Underutilization		
2021	African American	0.93%	3.59%	25.96	Underutilization	*	
	Asian American	21.43%	3.45%	621.50	Overutilization		
	Hispanic American	14.20%	4.97%	285.91	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	36.56%	12.00%	304.66	Overutilization		
	White Woman	3.51%	3.45%	101.92	Overutilization		
	TOTAL M/WBE	40.07%	15.45%	259.40	Overutilization		
	Non-M/WBE	59.93%	84.55%	70.88	Underutilization	*	
2022	African American	0.66%	3.59%	18.44	Underutilization	*	
	Asian American	20.07%	3.45%	581.97	Overutilization		
	Hispanic American	12.26%	4.97%	246.86	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	32.99%	12.00%	274.89	Overutilization		
	White Woman	4.70%	3.45%	136.38	Overutilization		
	TOTAL M/WBE	37.69%	15.45%	243.98	Overutilization		
	Non-M/WBE	62.31%	84.55%	73.69	Underutilization	*	
2023	African American	4.75%	3.59%	132.52	Overutilization		
	Asian American	8.79%	3.45%	254.87	Overutilization		
	Hispanic American	13.60%	4.97%	273.97	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	27.14%	12.00%	226.21	Overutilization		
	White Woman	7.16%	3.45%	207.53	Overutilization		
	TOTAL M/WBE	34.30%	15.45%	222.04	Overutilization		
	Non-M/WBE	65.70%	84.55%	77.70	Underutilization	*	
Total	African American	1.16%	3.59%	32.46	Underutilization	*	p < .05
	Asian American	15.40%	3.45%	446.70	Overutilization		
	Hispanic American	12.03%	4.97%	242.37	Overutilization		
	Native American	0.00%	0.00%	- n/a			-
	TOTAL MINORITY	28.60%	12.00%	238.35	Overutilization		
	White Woman	4.38%	3.45%	127.01	Overutilization		
	TOTAL M/WBE	32.98%	15.45%	213.50	Overutilization		
	Non-M/WBE	67.02%	84.55%	79.26	Underutilization	*	p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table F-17: Prime Disparity by Race, Gender, Ethnicity –
Professional Services (Non-CCNA)
(Using Local Award Dollars Less than \$500k, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	2.27%	6.33%	35.85	Underutilization	*	
	Asian American	34.54%	0.67%	5185.04	Overutilization		
	Hispanic American	3.51%	2.00%	175.58	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	40.32%	9.08%	444.21	Overutilization		
	White Woman	1.17%	3.04%	38.51	Underutilization	*	
	TOTAL M/WBE	41.49%	12.11%	342.43	Overutilization		
	Non-M/WBE	58.51%	87.89%	66.58	Underutilization	*	
2020	African American	1.48%	6.33%	23.43	Underutilization	*	
	Asian American	20.98%	0.67%	3149.65	Overutilization		
	Hispanic American	4.80%	2.00%	239.96	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	27.26%	9.08%	300.34	Overutilization		
	White Woman	2.40%	3.04%	78.81	Underutilization	*	
	TOTAL M/WBE	29.65%	12.11%	244.77	Overutilization		
	Non-M/WBE	70.35%	87.89%	80.04	Underutilization		
2021	African American	1.47%	6.33%	23.22	Underutilization	*	
	Asian American	29.85%	0.67%	4480.55	Overutilization		
	Hispanic American	5.08%	2.00%	254.16	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	36.39%	9.08%	401.00	Overutilization		
	White Woman	1.98%	3.04%	65.16	Underutilization	*	
	TOTAL M/WBE	38.37%	12.11%	316.75	Overutilization		
	Non-M/WBE	61.63%	87.89%	70.12	Underutilization	*	
2022	African American	5.71%	6.33%	90.17	Underutilization		
	Asian American	14.50%	0.67%	2176.78	Overutilization		
	Hispanic American	5.15%	2.00%	257.95	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	25.36%	9.08%	279.43	Overutilization		
	White Woman	0.79%	3.04%	26.05	Underutilization	*	
	TOTAL M/WBE	26.15%	12.11%	215.87	Overutilization		
	Non-M/WBE	73.85%	87.89%	84.03	Underutilization		
2023	African American	25.14%	6.33%	397.24	Overutilization		
	Asian American	25.88%	0.67%	3885.38	Overutilization		
	Hispanic American	5.31%	2.00%	265.59	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	56.33%	9.08%	620.62	Overutilization		
	White Woman	1.57%	3.04%	51.56	Underutilization	*	
	TOTAL M/WBE	57.89%	12.11%	477.86	Overutilization		
	Non-M/WBE	42.11%	87.89%	47.91	Underutilization	*	
Total	African American	7.20%	6.33%	113.74	Overutilization		FALSE
	Asian American	25.15%	0.67%	3775.46	Overutilization		
	Hispanic American	4.76%	2.00%	238.22	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	FALSE
	TOTAL MINORITY	37.11%	9.08%	408.85	Overutilization		
	White Woman	1.58%	3.04%	51.88	Underutilization	*	p < .05
	TOTAL M/WBE	38.68%	12.11%	319.30	Overutilization		
	Non-M/WBE	61.32%	87.89%	69.77	Underutilization	*	p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table F-18: Prime Disparity by Race, Gender, Ethnicity –Services
(Using Local Award Dollars Less than \$500k, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	6.72%	6.14%	109.45	Overutilization		
	Asian American	0.95%	0.40%	241.38	Overutilization		
	Hispanic American	7.62%	2.43%	313.24	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	15.30%	8.97%	170.53	Overutilization		
	White Woman	10.60%	1.86%	571.20	Overutilization		
	TOTAL M/WBE	25.90%	10.83%	239.18	Overutilization		
	Non-M/WBE	74.10%	89.17%	83.10	Underutilization		
2020	African American	4.43%	6.14%	72.10	Underutilization	*	
	Asian American	0.62%	0.40%	155.93	Overutilization		
	Hispanic American	13.50%	2.43%	555.00	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	18.55%	8.97%	206.75	Overutilization		
	White Woman	11.99%	1.86%	646.09	Overutilization		
	TOTAL M/WBE	30.54%	10.83%	282.03	Overutilization		
	Non-M/WBE	69.46%	89.17%	77.90	Underutilization	*	
2021	African American	3.31%	6.14%	53.96	Underutilization	*	
	Asian American	0.25%	0.40%	62.98	Underutilization	*	
	Hispanic American	6.64%	2.43%	272.74	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	10.20%	8.97%	113.68	Overutilization		
	White Woman	10.46%	1.86%	563.79	Overutilization		
	TOTAL M/WBE	20.66%	10.83%	190.81	Overutilization		
	Non-M/WBE	79.34%	89.17%	88.97	Underutilization		
2022	African American	2.89%	6.14%	47.11	Underutilization	*	
	Asian American	0.57%	0.40%	145.09	Overutilization		
	Hispanic American	10.83%	2.43%	445.12	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	14.30%	8.97%	159.37	Overutilization		
	White Woman	11.21%	1.86%	604.31	Overutilization		
	TOTAL M/WBE	25.51%	10.83%	235.61	Overutilization		
	Non-M/WBE	74.49%	89.17%	83.53	Underutilization		
2023	African American	1.22%	6.14%	19.80	Underutilization	*	
	Asian American	0.88%	0.40%	223.34	Overutilization		
	Hispanic American	13.08%	2.43%	537.42	Overutilization		
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	15.18%	8.97%	169.14	Overutilization		
	White Woman	10.85%	1.86%	584.85	Overutilization		
	TOTAL M/WBE	26.03%	10.83%	240.37	Overutilization		
	Non-M/WBE	73.97%	89.17%	82.96	Underutilization		
Total	African American	3.67%	6.14%	59.79	Underutilization	*	p < .05
	Asian American	0.65%	0.40%	163.36	Overutilization		FALSE
	Hispanic American	10.29%	2.43%	423.06	Overutilization		
	Native American	0.00%	0.00%	-	n/a		*
	TOTAL MINORITY	14.61%	8.97%	162.86	Overutilization		
	White Woman	11.00%	1.86%	593.11	Overutilization		
	TOTAL M/WBE	25.62%	10.83%	236.59	Overutilization		
	Non-M/WBE	74.38%	89.17%	83.42	Underutilization		p < .05

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Table F-19: Prime Disparity by Race, Gender, Ethnicity – Goods/Commodities
(Using Local Award Dollars Less than \$500k, CY2019-CY2023)

Palm Beach County 2025 Disparity Study

Fiscal Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	0.02%	3.69%	0.45	Underutilization	*	
	Asian American	3.22%	0.53%	602.69	Overutilization		
	Hispanic American	1.21%	1.80%	67.21	Underutilization	*	
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	4.45%	6.03%	73.80	Underutilization	*	
	White Woman	0.95%	3.99%	23.93	Underutilization	*	
	TOTAL M/WBE	5.40%	10.01%	53.95	Underutilization	*	
	Non-M/WBE	94.60%	89.99%	105.13	Overutilization		
2020	African American	1.40%	3.69%	37.98	Underutilization	*	
	Asian American	2.59%	0.53%	484.47	Overutilization		
	Hispanic American	1.11%	1.80%	61.43	Underutilization	*	
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	5.10%	6.03%	84.59	Underutilization		
	White Woman	1.11%	3.99%	27.91	Underutilization	*	
	TOTAL M/WBE	6.21%	10.01%	62.03	Underutilization	*	
	Non-M/WBE	93.79%	89.99%	104.23	Overutilization		
2021	African American	0.14%	3.69%	3.85	Underutilization	*	
	Asian American	2.45%	0.53%	458.20	Overutilization		
	Hispanic American	1.24%	1.80%	68.68	Underutilization	*	
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	3.83%	6.03%	63.50	Underutilization	*	
	White Woman	2.12%	3.99%	53.17	Underutilization	*	
	TOTAL M/WBE	5.95%	10.01%	59.39	Underutilization	*	
	Non-M/WBE	94.05%	89.99%	104.52	Overutilization		
2022	African American	0.13%	3.69%	3.46	Underutilization	*	
	Asian American	0.66%	0.53%	122.87	Overutilization		
	Hispanic American	2.00%	1.80%	111.42	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	2.79%	6.03%	46.27	Underutilization	*	
	White Woman	2.00%	3.99%	50.05	Underutilization	*	
	TOTAL M/WBE	4.78%	10.01%	47.78	Underutilization	*	
	Non-M/WBE	95.22%	89.99%	105.81	Overutilization		
2023	African American	0.66%	3.69%	17.93	Underutilization	*	
	Asian American	1.73%	0.53%	323.79	Overutilization		
	Hispanic American	2.36%	1.80%	131.26	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	4.76%	6.03%	78.88	Underutilization	*	
	White Woman	5.99%	3.99%	150.21	Overutilization		
	TOTAL M/WBE	10.74%	10.01%	107.28	Overutilization		
	Non-M/WBE	89.26%	89.99%	99.19	Underutilization		
Total	African American	0.49%	3.69%	13.38	Underutilization	*	p < .05
	Asian American	2.16%	0.53%	404.61	Overutilization		
	Hispanic American	1.54%	1.80%	85.72	Underutilization		FALSE
	Native American	0.00%	0.00%	- n/a			-
	TOTAL MINORITY	4.20%	6.03%	69.67	Underutilization	*	p < .05
	White Woman	2.33%	3.99%	58.48	Underutilization	*	p < .05
	TOTAL M/WBE	6.53%	10.01%	65.22	Underutilization	*	p < .05
	Non-M/WBE	93.47%	89.99%	103.87	Overutilization		

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APPENDIX G

ALTERNATIVE AVAILABILITY BY NAICS CODE

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX G: ALTERNATIVE AVAILABILITY BY NAICS CODE

Appendix G details the Availability of firms by race, ethnicity, and gender in the North American Industry Classification System ("NAICS") commodity codes. These are the NAICS codes utilized by the County in its procurement during the Study Period in Construction and Professional Services (CCNA) in the Relevant Geographic Market Area.

Table G-1 provides the distribution of vendor payments using local dollars by each NAICS code, using the payment file.

Table G-2 is the Availability of firms in each Industry Code using NAICS codes.

**Table G-1: Distribution of Vendor Payments by NAICS Code
(Using Local Payments)
Palm Beach County 2025 Disparity Study**

NAICS	Description	Work Category	Payment Amount	Payment Percent of Category
236220	Commercial and Institutional Building Construction	CONSTRUCTION	\$ 168,888,558.04	40.46%
237310	Highway, Street, and Bridge Construction	CONSTRUCTION	\$ 81,639,836.93	19.56%
236117	New Housing For-Sale Builders	CONSTRUCTION	\$ 50,164,377.59	12.02%
236115	New Single-Family Housing Construction (except For-Sale Builders)	CONSTRUCTION	\$ 31,433,673.05	7.53%
237110	Water and Sewer Line and Related Structures Construction	CONSTRUCTION	\$ 15,598,987.32	3.74%
238220	Plumbing, Heating, and Air-Conditioning Contractors	CONSTRUCTION	\$ 13,731,652.69	3.29%
238210	Electrical Contractors and Other Wiring Installation Contractors	CONSTRUCTION	\$ 12,997,788.15	3.11%
237990	Other Heavy and Civil Engineering Construction	CONSTRUCTION	\$ 9,930,577.82	2.38%
238320	Painting and Wall Covering Contractors	CONSTRUCTION	\$ 6,310,398.35	1.51%
221310	Water Supply and Irrigation Systems	CONSTRUCTION	\$ 5,410,174.00	1.30%
238160	Roofing Contractors	CONSTRUCTION	\$ 5,220,982.49	1.25%
237210	Land Subdivision	CONSTRUCTION	\$ 4,929,519.39	1.18%
238990	All Other Specialty Trade Contractors	CONSTRUCTION	\$ 3,494,749.45	0.84%
238190	Other Foundation, Structure, and Building Exterior Contractors	CONSTRUCTION	\$ 1,805,647.89	0.43%
236118	Residential Remodelers	CONSTRUCTION	\$ 1,802,469.64	0.43%
238390	Other Building Finishing Contractors	CONSTRUCTION	\$ 1,483,688.49	0.36%
238910	Site Preparation Contractors	CONSTRUCTION	\$ 891,810.82	0.21%
238110	Poured Concrete Foundation and Structure Contractors	CONSTRUCTION	\$ 768,397.00	0.18%
238310	Drywall and Insulation Contractors	CONSTRUCTION	\$ 477,144.55	0.11%
23611	Residential Building Construction	CONSTRUCTION	\$ 259,584.74	0.06%
484110	General Freight Trucking, Local	CONSTRUCTION	\$ 116,103.30	0.03%
238150	Glass and Glazing Contractors	CONSTRUCTION	\$ 54,798.00	0.01%
238120	Structural Steel and Precast Concrete Contractors	CONSTRUCTION	\$ 18,100.00	0.00%
238130	Framing Contractors	CONSTRUCTION	\$ 17,296.77	0.00%
236116	New Multifamily Housing Construction (except For-Sale Builders)	CONSTRUCTION	\$ 2,062.00	0.00%
238350	Finish Carpentry Contractors	CONSTRUCTION	\$ 1,465.38	0.00%
541330	Engineering Services	PROFESSIONAL SERVICES (CCNA)	\$ 65,355,932.96	73.32%
541310	Architectural Services	PROFESSIONAL SERVICES (CCNA)	\$ 20,246,921.74	22.71%
541320	Landscape Architectural Services	PROFESSIONAL SERVICES (CCNA)	\$ 2,448,272.58	2.75%
541370	Surveying and Mapping (except Geophysical) Services	PROFESSIONAL SERVICES (CCNA)	\$ 515,573.91	0.58%
541360	Geophysical Surveying and Mapping Services	PROFESSIONAL SERVICES (CCNA)	\$ 374,930.30	0.42%
541350	Building Inspection Services	PROFESSIONAL SERVICES (CCNA)	\$ 180,245.00	0.20%
541490	Other Specialized Design Services	PROFESSIONAL SERVICES (CCNA)	\$ 21,700.30	0.02%

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Table G-2 (M/WBE) utilizes D&B Hoovers data to identify firms that provide Construction and Professional Services (CCNA) services in the NAICS codes in which the County makes purchases within the Relevant Geographic Market Area. It should be noted that these are not necessarily firms that have demonstrated a willingness to do business with the government, nor made any effort to do so.

The small numbers and percentages reflected below demonstrate that certified M/WBE firms in Palm Beach County are underrepresented in the D&B Hoovers Data. This is proven by looking at the number of certified firms reflected in Appendix E that are missing in the D&B analysis.

**Table G-2: D&B Hoovers M/WBE Availability Estimates –
Construction & Professional Services (CCNA)
in the Relevant Geographic Market Area
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Construction	Professional Services (CCNA)	Total
	(#)	(#)	(#)
African American	61	15	76
Asian American	7	19	26
Hispanic American	54	30	84
Native American	0	0	0
TOTAL MINORITY	122	64	186
White Woman	41	21	62
TOTAL M/WBE	163	85	248
Non-M/WBE	22,324	9,830	32,154
TOTAL	22,487	9,915	32,402
Business Ownership Classification	Construction	Professional Services (CCNA)	Total
	(%)	(%)	(%)
African American	0.27%	0.15%	0.23%
Asian American	0.03%	0.19%	0.08%
Hispanic American	0.24%	0.30%	0.26%
Native American	0.00%	0.00%	0.00%
TOTAL MINORITY	0.54%	0.65%	0.57%
White Woman	0.18%	0.21%	0.19%
TOTAL M/WBE	0.72%	0.86%	0.77%
Non-M/WBE	99.28%	99.14%	99.23%
TOTAL	100.00%	100.00%	100.00%

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APPENDIX H

PRIME CONTRACTOR UTILIZATION AND DISPARITY ANALYSIS - STATE FUNDED DOLLARS

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX H: PRIME CONTRACTOR UTILIZATION AND DISPARITY ANALYSIS – STATE FUNDED DOLLARS

Appendix H presents a detailed analysis of state-funded prime payments for Palm Beach County, covering the Study Period of calendar years from 2019 through 2023. This section is presented separately from the Quantitative Chapter, which focuses exclusively on locally funded prime payments, as state funded projects are exempt from any County APIs.

Given this distinction, the tables in this appendix provide insight into how state-funded dollars were distributed among firms across each Industry Category, including Construction, Professional Services (CCNA), Professional Services (Non-CCNA), Services, and Goods/Commodities. Specifically, the Appendix includes:

- Average dollars received per firm within each study group (Tables H-1, H-4, H-7, H-10, and H-13)
- Firm counts by Industry Category and year (Tables H-2, H-5, H-8, H-11, and H-14)
- Annual and overall Utilization of prime firms, by Industry Category and Study Group (Tables H-3, H-6, H-9, H-12, and H-15)
- Disparity Indices, comparing Utilization based on state-funded payments to the corresponding availability estimates (Tables H-16 through H-21)

This analysis also provides context for how state-funded procurement compares to local procurement.

**Table H-1: Average M/WBE Prime Spend in Construction
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Average Firm Spend
African American	\$ 427,763
Asian American	\$ -
Hispanic American	\$ 221,437
Native American	\$ -
TOTAL MINORITY	\$ 348,407
White Woman	\$ 346,507
TOTAL M/WBE	\$ 347,960
Non-M/WBE	\$ 1,002,302
TOTAL FIRMS	\$ 810,512

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table H-2: Number of Prime Construction Firms
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019 (#)	2020 (#)	2021 (#)	2022 (#)	2023 (#)	Total Number of Unique Businesses (#)
African American	4	7	5	4	2	8
Asian American	0	0	0	0	0	0
Hispanic American	1	0	2	1	1	5
Native American	0	0	0	0	0	0
TOTAL MINORITY	5	7	7	5	3	13
White Woman	1	3	4	3	2	4
TOTAL M/WBE	6	10	11	8	5	17
Non-M/WBE	17	22	20	22	8	41
TOTAL FIRMS	23	32	31	30	13	58
Business Ownership Classification	2019 (%)	2020 (%)	2021 (%)	2022 (%)	2023 (%)	Total Number of Unique Businesses (%)
African American	17.39%	21.88%	16.13%	13.33%	15.38%	13.79%
Asian American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic American	4.35%	0.00%	6.45%	3.33%	7.69%	8.62%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	21.74%	21.88%	22.58%	16.67%	23.08%	22.41%
White Woman	4.35%	9.38%	12.90%	10.00%	15.38%	6.90%
TOTAL M/WBE	26.09%	31.25%	35.48%	26.67%	38.46%	29.31%
Non-M/WBE	73.91%	68.75%	64.52%	73.33%	61.54%	70.69%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table H-3: Utilization Analysis of Prime Construction
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019 (\$)	2020 (\$)	2021 (\$)	2022 (\$)	2023 (\$)	TOTAL (\$)
African American	\$ 1,104,700	\$ 1,045,472	\$ 851,348	\$ 254,880	\$ 165,706	\$ 3,422,105
Asian American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Hispanic American	\$ 11,800	\$ 0	\$ 281,553	\$ 811,732	\$ 2,100	\$ 1,107,185
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 1,116,500	\$ 1,045,472	\$ 1,132,901	\$ 1,066,611	\$ 167,806	\$ 4,529,290
White Woman	\$ 920	\$ 562,426	\$ 407,598	\$ 399,777	\$ 15,305	\$ 1,386,026
TOTAL M/WBE	\$ 1,117,420	\$ 1,607,898	\$ 1,540,499	\$ 1,466,388	\$ 183,112	\$ 5,915,317
Non-M/WBE	\$ 6,309,616	\$ 15,844,254	\$ 10,525,099	\$ 7,509,574	\$ 905,842	\$ 41,094,386
TOTAL FIRMS	\$ 7,427,036	\$ 17,452,152	\$ 12,065,598	\$ 8,975,963	\$ 1,088,954	\$ 47,009,703
Business Ownership Classification	2019 (%)	2020 (%)	2021 (%)	2022 (%)	2023 (%)	TOTAL (%)
African American	14.87%	5.99%	7.06%	2.84%	15.22%	7.28%
Asian American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic American	0.16%	0.00%	2.33%	9.04%	0.19%	2.36%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	15.03%	5.99%	9.39%	11.88%	15.41%	9.63%
White Woman	0.01%	3.22%	3.38%	4.45%	1.41%	2.95%
TOTAL M/WBE	15.05%	9.21%	12.77%	16.34%	16.82%	12.58%
Non-M/WBE	84.95%	90.79%	87.23%	83.66%	83.18%	87.42%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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Table H-4: Average M/WBE Prime Spend in Professional Services (CCNA)
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Business Ownership Classification	Average Firm Spend
African American	\$ 10,737
Asian American	\$ 186,686
Hispanic American	\$ 61,630
Native American	\$ -
TOTAL MINORITY	\$ 105,073
White Woman	\$ 65,603
TOTAL M/WBE	\$ 100,688
Non-M/WBE	\$ 253,258
TOTAL FIRMS	\$ 200,445

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Table H-5: Number of Prime Professional Services (CCNA) Firms
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Business Ownership Classification	2019 (#)	2020 (#)	2021 (#)	2022 (#)	2023 (#)	Total Number of Unique Businesses (#)
African American	2	1	0	1	1	3
Asian American	2	2	3	4	1	4
Hispanic American	0	1	1	0	0	1
Native American	0	0	0	0	0	0
TOTAL MINORITY	4	4	4	5	2	8
White Woman	1	1	0	1	1	1
TOTAL M/WBE	5	5	4	6	3	9
Non-M/WBE	11	10	10	11	3	17
TOTAL FIRMS	16	15	14	17	6	26
Business Ownership Classification	2019 (%)	2020 (%)	2021 (%)	2022 (%)	2023 (%)	Total Number of Unique Businesses (%)
African American	12.50%	6.67%	0.00%	5.88%	16.67%	11.54%
Asian American	12.50%	13.33%	21.43%	23.53%	16.67%	15.38%
Hispanic American	0.00%	6.67%	7.14%	0.00%	0.00%	3.85%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	25.00%	26.67%	28.57%	29.41%	33.33%	30.77%
White Woman	6.25%	6.67%	0.00%	5.88%	16.67%	3.85%
TOTAL M/WBE	31.25%	33.33%	28.57%	35.29%	50.00%	34.62%
Non-M/WBE	68.75%	66.67%	71.43%	64.71%	50.00%	65.38%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table H-6: Utilization Analysis of Prime Professional Services (CCNA)
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 10,984	\$ 16,314	\$ 0	\$ 3,112	\$ 1,801	\$ 32,212
Asian American	\$ 91,715	\$ 209,084	\$ 242,374	\$ 74,608	\$ 128,962	\$ 746,743
Hispanic American	\$ 0	\$ 27,830	\$ 33,800	\$ 0	\$ 0	\$ 61,630
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 102,700	\$ 253,228	\$ 276,174	\$ 77,720	\$ 130,763	\$ 840,585
White Woman	\$ 20,703	\$ 38,896	\$ 0	\$ 2,500	\$ 3,504	\$ 65,603
TOTAL M/WBE	\$ 123,403	\$ 292,124	\$ 276,174	\$ 80,220	\$ 134,267	\$ 906,188
Non-M/WBE	\$ 971,213	\$ 1,698,694	\$ 935,720	\$ 528,314	\$ 171,452	\$ 4,305,391
TOTAL FIRMS	\$ 1,094,615	\$ 1,990,818	\$ 1,211,893	\$ 608,534	\$ 305,719	\$ 5,211,579
Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	1.00%	0.82%	0.00%	0.51%	0.59%	0.62%
Asian American	8.38%	10.50%	20.00%	12.26%	42.18%	14.33%
Hispanic American	0.00%	1.40%	2.79%	0.00%	0.00%	1.18%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	9.38%	12.72%	22.79%	12.77%	42.77%	16.13%
White Woman	1.89%	1.95%	0.00%	0.41%	1.15%	1.26%
TOTAL M/WBE	11.27%	14.67%	22.79%	13.18%	43.92%	17.39%
Non-M/WBE	88.73%	85.33%	77.21%	86.82%	56.08%	82.61%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table H-7: Average M/WBE Prime Spend in Professional Services (Non-CCNA)
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Average Firm Spend
African American	\$ 21,701
Asian American	\$ 217,802
Hispanic American	\$ 35,417
Native American	\$ -
TOTAL MINORITY	\$ 123,180
White Woman	\$ -
TOTAL M/WBE	\$ 123,180
Non-M/WBE	\$ 63,958
TOTAL FIRMS	\$ 73,069

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**Table H-8: Number of Prime Professional Services (Non-CCNA) Firms
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019 (#)	2020 (#)	2021 (#)	2022 (#)	2023 (#)	Total Number of Unique Businesses (#)
African American	0	0	0	0	1	1
Asian American	1	1	1	2	1	2
Hispanic American	1	1	1	1	1	1
Native American	0	0	0	0	0	0
TOTAL MINORITY	2	2	2	3	3	4
White Woman	0	0	0	0	0	0
TOTAL M/WBE	2	2	2	3	3	4
Non-M/WBE	12	10	4	6	2	22
TOTAL FIRMS	14	12	6	9	5	26
Business Ownership Classification	2019 (%)	2020 (%)	2021 (%)	2022 (%)	2023 (%)	Total Number of Unique Businesses (%)
African American	0.00%	0.00%	0.00%	0.00%	20.00%	3.85%
Asian American	7.14%	8.33%	16.67%	22.22%	20.00%	7.69%
Hispanic American	7.14%	8.33%	16.67%	11.11%	20.00%	3.85%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	14.29%	16.67%	33.33%	33.33%	60.00%	15.38%
White Woman	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL M/WBE	14.29%	16.67%	33.33%	33.33%	60.00%	15.38%
Non-M/WBE	85.71%	83.33%	66.67%	66.67%	40.00%	84.62%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table H-9: Utilization Analysis of Prime Professional Services (Non-CCNA)
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019 (\$)	2020 (\$)	2021 (\$)	2022 (\$)	2023 (\$)	TOTAL (\$)
African American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 21,701	\$ 21,701
Asian American	\$ 127,328	\$ 163,701	\$ 113,275	\$ 7,201	\$ 24,099	\$ 435,604
Hispanic American	\$ 9,142	\$ 13,675	\$ 4,367	\$ 7,509	\$ 724	\$ 35,417
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 136,470	\$ 177,376	\$ 117,642	\$ 14,710	\$ 46,524	\$ 492,722
White Woman	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL M/WBE	\$ 136,470	\$ 177,376	\$ 117,642	\$ 14,710	\$ 46,524	\$ 492,722
Non-M/WBE	\$ 1,189,082	\$ 61,977	\$ 100,245	\$ 36,083	\$ 19,693	\$ 1,407,079
TOTAL FIRMS	\$ 1,325,551	\$ 239,353	\$ 217,887	\$ 50,793	\$ 66,216	\$ 1,899,801
Business Ownership Classification	2019 (%)	2020 (%)	2021 (%)	2022 (%)	2023 (%)	TOTAL (%)
African American	0.00%	0.00%	0.00%	0.00%	32.77%	1.14%
Asian American	9.61%	68.39%	51.99%	14.18%	36.39%	22.93%
Hispanic American	0.69%	5.71%	2.00%	14.78%	1.09%	1.86%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	10.30%	74.11%	53.99%	28.96%	70.26%	25.94%
White Woman	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL M/WBE	10.30%	74.11%	53.99%	28.96%	70.26%	25.94%
Non-M/WBE	89.70%	25.89%	46.01%	71.04%	29.74%	74.06%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table H-10: Average M/WBE Prime Spend in Services
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Average Firm Spend
African American	\$ 50,980
Asian American	\$ -
Hispanic American	\$ 202,060
Native American	\$ -
TOTAL MINORITY	\$ 126,520
White Woman	\$ -
TOTAL M/WBE	\$ 129,935
Non-M/WBE	\$ 111,324
TOTAL FIRMS	\$ 114,278

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**Table H-11: Number of Prime Services Firms
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019 (#)	2020 (#)	2021 (#)	2022 (#)	2023 (#)	Total Number of Unique Businesses (#)
African American	3	4	3	3	0	5
Asian American	0	0	0	0	0	0
Hispanic American	3	3	5	5	4	5
Native American	0	0	0	0	0	0
TOTAL MINORITY	6	7	8	8	4	10
White Woman	3	2	1	0	0	0
TOTAL M/WBE	9	9	9	8	4	10
Non-M/WBE	33	24	21	21	13	53
TOTAL FIRMS	42	33	30	29	17	63
Business Ownership Classification	2019 (%)	2020 (%)	2021 (%)	2022 (%)	2023 (%)	Total Number of Unique Businesses (%)
African American	7.14%	12.12%	10.00%	10.34%	0.00%	7.94%
Asian American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic American	7.14%	9.09%	16.67%	17.24%	23.53%	7.94%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	14.29%	21.21%	26.67%	27.59%	23.53%	15.87%
White Woman	7.14%	6.06%	3.33%	0.00%	0.00%	0.00%
TOTAL M/WBE	21.43%	27.27%	30.00%	27.59%	23.53%	15.87%
Non-M/WBE	78.57%	72.73%	70.00%	72.41%	76.47%	84.13%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table H-12: Utilization Analysis of Prime Services
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019 (\$)	2020 (\$)	2021 (\$)	2022 (\$)	2023 (\$)	TOTAL (\$)
African American	\$ 88,806	\$ 92,600	\$ 46,907	\$ 26,588	\$ 0	\$ 254,901
Asian American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Hispanic American	\$ 112,356	\$ 305,964	\$ 259,986	\$ 255,780	\$ 76,214	\$ 1,010,301
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 201,162	\$ 398,564	\$ 306,893	\$ 282,368	\$ 76,214	\$ 1,265,201
White Woman	\$ 17,142	\$ 13,635	\$ 3,375	\$ 0	\$ 0	\$ 34,152
TOTAL M/WBE	\$ 218,304	\$ 412,199	\$ 310,268	\$ 282,368	\$ 76,214	\$ 1,299,353
Non-M/WBE	\$ 1,308,298	\$ 1,636,710	\$ 1,227,208	\$ 1,113,816	\$ 614,141	\$ 5,900,174
TOTAL FIRMS	\$ 1,526,602	\$ 2,048,910	\$ 1,537,476	\$ 1,396,184	\$ 690,355	\$ 7,199,527
Business Ownership Classification	2019 (%)	2020 (%)	2021 (%)	2022 (%)	2023 (%)	TOTAL (%)
African American	5.82%	4.52%	3.05%	1.90%	0.00%	3.54%
Asian American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic American	7.36%	14.93%	16.91%	18.32%	11.04%	14.03%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	13.18%	19.45%	19.96%	20.22%	11.04%	17.57%
White Woman	1.12%	0.67%	0.22%	0.00%	0.00%	0.47%
TOTAL M/WBE	14.30%	20.12%	20.18%	20.22%	11.04%	18.05%
Non-M/WBE	85.70%	79.88%	79.82%	79.78%	88.96%	81.95%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table H-13: Average M/WBE Prime Spend in Goods/Commodities
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	Average Firm Spend
African American	\$ 400
Asian American	\$ -
Hispanic American	\$ 2,169
Native American	\$ -
TOTAL MINORITY	\$ 1,579
White Woman	\$ 8,216
TOTAL M/WBE	\$ 6,225
Non-M/WBE	\$ 177,264
TOTAL FIRMS	\$ 150,950

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**Table H-14: Number of Prime Goods/Commodities Firms
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(#)	(#)	(#)	(#)	(#)	(#)
African American	1	0	0	0	0	1
Asian American	0	0	0	0	0	0
Hispanic American	1	0	1	1	0	2
Native American	0	0	0	0	0	0
TOTAL MINORITY	2	0	1	1	0	3
White Woman	6	4	4	1	1	7
TOTAL M/WBE	8	4	5	2	1	10
Non-M/WBE	40	35	30	26	13	55
TOTAL FIRMS	48	39	35	28	14	65
Business Ownership Classification	2019	2020	2021	2022	2023	Total Number of Unique Businesses
	(%)	(%)	(%)	(%)	(%)	(%)
African American	2.08%	0.00%	0.00%	0.00%	0.00%	1.54%
Asian American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic American	2.08%	0.00%	2.86%	3.57%	0.00%	3.08%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	4.17%	0.00%	2.86%	3.57%	0.00%	4.62%
White Woman	12.50%	10.26%	11.43%	3.57%	7.14%	10.77%
TOTAL M/WBE	16.67%	10.26%	14.29%	7.14%	7.14%	15.38%
Non-M/WBE	83.33%	89.74%	85.71%	92.86%	92.86%	84.62%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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**Table H-15: Utilization Analysis of Prime Goods/Commodities
in the Relevant Geographic Market Area
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 400	\$ 0	\$ 0	\$ 0	\$ 0	\$ 400
Asian American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
Hispanic American	\$ 458	\$ 0	\$ 2,305	\$ 1,575	\$ 0	\$ 4,338
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 858	\$ 0	\$ 2,305	\$ 1,575	\$ 0	\$ 4,738
White Woman	\$ 16,388	\$ 8,458	\$ 18,708	\$ 4,719	\$ 9,240	\$ 57,513
TOTAL M/WBE	\$ 17,246	\$ 8,458	\$ 21,013	\$ 6,294	\$ 9,240	\$ 62,251
Non-M/WBE	\$ 2,141,436	\$ 3,590,418	\$ 2,084,834	\$ 1,542,725	\$ 390,091	\$ 9,749,503
TOTAL FIRMS	\$ 2,158,682	\$ 3,598,876	\$ 2,105,847	\$ 1,549,019	\$ 399,331	\$ 9,811,754
Business Ownership Classification	2019	2020	2021	2022	2023	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%
Asian American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic American	0.02%	0.00%	0.11%	0.10%	0.00%	0.04%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	0.04%	0.00%	0.11%	0.10%	0.00%	0.05%
White Woman	0.76%	0.24%	0.89%	0.30%	2.31%	0.59%
TOTAL M/WBE	0.80%	0.24%	1.00%	0.41%	2.31%	0.63%
Non-M/WBE	99.20%	99.76%	99.00%	99.59%	97.69%	99.37%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

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Table H-16: Prime Vendor Utilization Disparity Analysis Summary
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Business Ownership Classification	Industry Categories				
	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities
African American	135.78	17.23	18.05	57.63	0.11
Asian American	0.00	415.53	3442.21	0.00	0.00
Hispanic American	53.18	23.82	93.29	576.75	2.46
Native American	-	-	0.00	-	-
TOTAL MINORITY	92.88	134.41	285.77	195.87	0.80
White Woman	105.40	36.51	0.00	25.57	14.70
TOTAL M/WBE	95.54	112.56	214.08	166.69	6.34
Non-M/WBE	100.68	97.71	84.27	91.90	110.42

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Legend:

* Statistically significant underutilization (Confidence interval of 95% and probability of error of less than 5%).

**Very small number to produce statistical significance

Statistically Significant Underutilization (Disparity percentage below 80%).

Disparity, but not Statistically Significant (Disparity percentage 80% to 99.9%).

Overutilization (Disparity percentage over 100%).

No color is Parity.

PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table H-17: Prime Disparity Indices by Race, Gender, Ethnicity – Construction
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Calendar Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	14.87%	5.36%	277.43	Overutilization		
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	0.16%	4.43%	3.59	Underutilization	*	
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	15.03%	10.37%	144.92	Overutilization		
	White Woman	0.01%	2.80%	0.44	Underutilization	*	
	TOTAL M/WBE	15.05%	13.17%	114.24	Overutilization		
	Non-M/WBE	84.95%	86.83%	97.84	Underutilization		
2020	African American	5.99%	5.36%	111.74	Overutilization		
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	0.00%	4.43%	0.00	Underutilization	*	
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	5.99%	10.37%	57.75	Underutilization	*	
	White Woman	3.22%	2.80%	115.21	Overutilization		
	TOTAL M/WBE	9.21%	13.17%	69.95	Underutilization	*	
	Non-M/WBE	90.79%	86.83%	104.56	Overutilization		
2021	African American	7.06%	5.36%	131.61	Overutilization		
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	2.33%	4.43%	52.69	Underutilization	*	
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	9.39%	10.37%	90.52	Underutilization		
	White Woman	3.38%	2.80%	120.77	Overutilization		
	TOTAL M/WBE	12.77%	13.17%	96.94	Underutilization		
	Non-M/WBE	87.23%	86.83%	100.46	Overutilization		
2022	African American	2.84%	5.36%	52.96	Underutilization	*	
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	9.04%	4.43%	204.19	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	11.88%	10.37%	114.56	Overutilization		
	White Woman	4.45%	2.80%	159.23	Overutilization		
	TOTAL M/WBE	16.34%	13.17%	124.04	Overutilization		
	Non-M/WBE	83.66%	86.83%	96.35	Underutilization		
2023	African American	15.22%	5.36%	283.83	Overutilization		
	Asian American	0.00%	0.58%	0.00	Underutilization	*	
	Hispanic American	0.19%	4.43%	4.35	Underutilization	*	
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	15.41%	10.37%	148.56	Overutilization		
	White Woman	1.41%	2.80%	50.25	Underutilization	*	
	TOTAL M/WBE	16.82%	13.17%	127.68	Overutilization		
	Non-M/WBE	83.18%	86.83%	95.80	Underutilization		
Total	African American	7.28%	5.36%	135.78	Overutilization		
	Asian American	0.00%	0.58%	0.00	Underutilization	*	p <.05
	Hispanic American	2.36%	4.43%	53.18	Underutilization	*	p <.05
	Native American	0.00%	0.00%	- n/a			-
	TOTAL MINORITY	9.63%	10.37%	92.88	Underutilization		
	White Woman	2.95%	2.80%	105.40	Overutilization		
	TOTAL M/WBE	12.58%	13.17%	95.54	Underutilization		
	Non-M/WBE	87.42%	86.83%	100.68	Overutilization		

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table H-18: Prime Disparity Indices by Race, Gender, Ethnicity –
Professional Services (CCNA)
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Calendar Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	1.00%	3.59%	27.98	Underutilization	*	
	Asian American	8.38%	3.45%	242.98	Overutilization		
	Hispanic American	0.00%	4.97%	0.00	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	9.38%	12.00%	78.19	Underutilization	*	
	White Woman	1.89%	3.45%	54.85	Underutilization	*	
	TOTAL M/WBE	11.27%	15.45%	72.98	Underutilization	*	
	Non-M/WBE	88.73%	84.55%	104.94	Overutilization		
2020	African American	0.82%	3.59%	22.85	Underutilization	*	
	Asian American	10.50%	3.45%	304.57	Overutilization		
	Hispanic American	1.40%	4.97%	28.15	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	12.72%	12.00%	106.00	Overutilization		
	White Woman	1.95%	3.45%	56.66	Underutilization	*	
	TOTAL M/WBE	14.67%	15.45%	94.99	Underutilization		
	Non-M/WBE	85.33%	84.55%	100.92	Overutilization		
2021	African American	0.00%	3.59%	0.00	Underutilization	*	
	Asian American	20.00%	3.45%	579.99	Overutilization		
	Hispanic American	2.79%	4.97%	56.17	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	22.79%	12.00%	189.91	Overutilization		
	White Woman	0.00%	3.45%	0.00	Underutilization	*	
	TOTAL M/WBE	22.79%	15.45%	147.52	Overutilization		
	Non-M/WBE	77.21%	84.55%	91.32	Underutilization		
2022	African American	0.51%	3.59%	14.26	Underutilization	*	
	Asian American	12.26%	3.45%	355.55	Overutilization		
	Hispanic American	0.00%	4.97%	0.00	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	12.77%	12.00%	106.43	Overutilization		
	White Woman	0.41%	3.45%	11.91	Underutilization	*	
	TOTAL M/WBE	13.18%	15.45%	85.33	Underutilization		
	Non-M/WBE	86.82%	84.55%	102.68	Overutilization		
2023	African American	0.59%	3.59%	16.43	Underutilization	*	
	Asian American	42.18%	3.45%	1223.31	Overutilization		
	Hispanic American	0.00%	4.97%	0.00	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	42.77%	12.00%	356.44	Overutilization		
	White Woman	1.15%	3.45%	33.24	Underutilization	*	
	TOTAL M/WBE	43.92%	15.45%	284.29	Overutilization		
	Non-M/WBE	56.08%	84.55%	66.33	Underutilization	*	
Total	African American	0.62%	3.59%	17.23	Underutilization	*	p < .05
	Asian American	14.33%	3.45%	415.53	Overutilization		
	Hispanic American	1.18%	4.97%	23.82	Underutilization	*	p < .05
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	16.13%	12.00%	134.41	Overutilization		
	White Woman	1.26%	3.45%	36.51	Underutilization	*	p < .05
	TOTAL M/WBE	17.39%	15.45%	112.56	Overutilization		
	Non-M/WBE	82.61%	84.55%	97.71	Underutilization		p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table H-19: Prime Disparity Indices by Race, Gender, Ethnicity –
Professional Services (Non-CCNA)
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Calendar Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	0.00%	6.33%	0.00	Underutilization	*	
	Asian American	9.61%	0.67%	1442.05	Overutilization		
	Hispanic American	0.69%	2.00%	34.51	Underutilization	*	
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	10.30%	9.08%	113.44	Overutilization		
	White Woman	0.00%	3.04%	0.00	Underutilization	*	
	TOTAL M/WBE	10.30%	12.11%	84.98	Underutilization		
2020	Non-M/WBE	89.70%	87.89%	102.07	Overutilization		
	African American	0.00%	6.33%	0.00	Underutilization	*	
	Asian American	68.39%	0.67%	10267.53	Overutilization		
	Hispanic American	5.71%	2.00%	285.90	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	74.11%	9.08%	816.53	Overutilization		
	White Woman	0.00%	3.04%	0.00	Underutilization	*	
2021	TOTAL M/WBE	74.11%	12.11%	611.70	Overutilization		
	Non-M/WBE	25.89%	87.89%	29.46	Underutilization	*	
	African American	0.00%	6.33%	0.00	Underutilization	*	
	Asian American	51.99%	0.67%	7804.69	Overutilization		
	Hispanic American	2.00%	2.00%	100.30	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	53.99%	9.08%	594.90	Overutilization		
2022	White Woman	0.00%	3.04%	0.00	Underutilization	*	
	TOTAL M/WBE	53.99%	12.11%	445.67	Overutilization		
	Non-M/WBE	46.01%	87.89%	52.35	Underutilization	*	
	African American	0.00%	6.33%	0.00	Underutilization	*	
	Asian American	14.18%	0.67%	2128.36	Overutilization		
	Hispanic American	14.78%	2.00%	739.79	Overutilization		
	Native American	0.00%	0.08%	0.00	Underutilization	*	
2023	TOTAL MINORITY	28.96%	9.08%	319.10	Overutilization		
	White Woman	0.00%	3.04%	0.00	Underutilization	*	
	TOTAL M/WBE	28.96%	12.11%	239.05	Overutilization		
	Non-M/WBE	71.04%	87.89%	80.83	Underutilization		
	African American	32.77%	6.33%	517.88	Overutilization		
	Asian American	36.39%	0.67%	5463.79	Overutilization		
	Hispanic American	1.09%	2.00%	54.71	Underutilization	*	
Total	Native American	0.00%	0.08%	0.00	Underutilization	*	
	TOTAL MINORITY	70.26%	9.08%	774.15	Overutilization		
	White Woman	0.00%	3.04%	0.00	Underutilization	*	
	TOTAL M/WBE	70.26%	12.11%	579.95	Overutilization		
	Non-M/WBE	29.74%	87.89%	33.84	Underutilization	*	
	African American	1.14%	6.33%	18.05	Underutilization	*	p < .05
	Asian American	22.93%	0.67%	3442.21	Overutilization		
Total	Hispanic American	1.86%	2.00%	93.29	Underutilization		FALSE
	Native American	0.00%	0.08%	0.00	Underutilization	*	FALSE
	TOTAL MINORITY	25.94%	9.08%	285.77	Overutilization		
	White Woman	0.00%	3.04%	0.00	Underutilization	*	p < .05
	TOTAL M/WBE	25.94%	12.11%	214.08	Overutilization		
Total	Non-M/WBE	74.06%	87.89%	84.27	Underutilization		p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table H-20: Prime Disparity Indices by Race, Gender, Ethnicity – Services
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Calendar Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	5.82%	6.14%	94.69	Underutilization		
	Asian American	0.00%	0.40%	0.00	Underutilization	*	
	Hispanic American	7.36%	2.43%	302.49	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	13.18%	8.97%	146.87	Overutilization		
	White Woman	1.12%	1.86%	60.52	Underutilization	*	
	TOTAL M/WBE	14.30%	10.83%	132.07	Overutilization		
2020	Non-M/WBE	85.70%	89.17%	96.11	Underutilization		
	African American	4.52%	6.14%	73.56	Underutilization	*	
	Asian American	0.00%	0.40%	0.00	Underutilization	*	
	Hispanic American	14.93%	2.43%	613.75	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	19.45%	8.97%	216.81	Overutilization		
	White Woman	0.67%	1.86%	35.87	Underutilization	*	
2021	TOTAL M/WBE	20.12%	10.83%	185.81	Overutilization		
	Non-M/WBE	79.88%	89.17%	89.58	Underutilization		
	African American	3.05%	6.14%	49.66	Underutilization	*	
	Asian American	0.00%	0.40%	0.00	Underutilization	*	
	Hispanic American	16.91%	2.43%	695.00	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	19.96%	8.97%	222.48	Overutilization		
2022	White Woman	0.22%	1.86%	11.83	Underutilization	*	
	TOTAL M/WBE	20.18%	10.83%	186.38	Overutilization		
	Non-M/WBE	79.82%	89.17%	89.51	Underutilization		
	African American	1.90%	6.14%	31.00	Underutilization	*	
	Asian American	0.00%	0.40%	0.00	Underutilization	*	
	Hispanic American	18.32%	2.43%	752.95	Overutilization		
	Native American	0.00%	0.00%	- n/a			
2023	TOTAL MINORITY	20.22%	8.97%	225.41	Overutilization		
	White Woman	0.00%	1.86%	0.00	Underutilization	*	
	TOTAL M/WBE	20.22%	10.83%	186.79	Overutilization		
	Non-M/WBE	79.78%	89.17%	89.46	Underutilization		
	African American	0.00%	6.14%	0.00	Underutilization	*	
	Asian American	0.00%	0.40%	0.00	Underutilization	*	
	Hispanic American	11.04%	2.43%	453.74	Overutilization		
Total	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	11.04%	8.97%	123.05	Overutilization		
	White Woman	0.00%	1.86%	0.00	Underutilization	*	
	TOTAL M/WBE	11.04%	10.83%	101.96	Overutilization		
	Non-M/WBE	88.96%	89.17%	99.76	Underutilization		
	African American	3.54%	6.14%	57.63	Underutilization	*	p < .05
	Asian American	0.00%	0.40%	0.00	Underutilization	*	p < .05
Total	Hispanic American	14.03%	2.43%	576.75	Overutilization		
	Native American	0.00%	0.00%	- n/a			
	TOTAL MINORITY	17.57%	8.97%	195.87	Overutilization		
	White Woman	0.47%	1.86%	25.57	Underutilization	*	p < .05
	TOTAL M/WBE	18.05%	10.83%	166.69	Overutilization		
Total	Non-M/WBE	81.95%	89.17%	91.90	Underutilization		p < .05

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PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

**Table H-21: Prime Disparity Indices by Race, Gender, Ethnicity – Goods/Commodities
(Using State Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study**

Calendar Year	Business Ownership	Percent of Dollars	Percent of Available Firms	Disparity Index	Disparate Impact of Utilization	Less than 80%	Statistical Significance
2019	African American	0.02%	3.69%	0.50	Underutilization	*	
	Asian American	0.00%	0.53%	0.00	Underutilization	*	
	Hispanic American	0.02%	1.80%	1.18	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	0.04%	6.03%	0.66	Underutilization	*	
	White Woman	0.76%	3.99%	19.04	Underutilization	*	
	TOTAL M/WBE	0.80%	10.01%	7.98	Underutilization	*	
2020	Non-M/WBE	99.20%	89.99%	110.24	Overutilization		
	African American	0.00%	3.69%	0.00	Underutilization	*	
	Asian American	0.00%	0.53%	0.00	Underutilization	*	
	Hispanic American	0.00%	1.80%	0.00	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	0.00%	6.03%	0.00	Underutilization	*	
	White Woman	0.24%	3.99%	5.90	Underutilization	*	
2021	TOTAL M/WBE	0.24%	10.01%	2.35	Underutilization	*	
	Non-M/WBE	99.76%	89.99%	110.87	Overutilization		
	African American	0.00%	3.69%	0.00	Underutilization	*	
	Asian American	0.00%	0.53%	0.00	Underutilization	*	
	Hispanic American	0.11%	1.80%	6.09	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	0.11%	6.03%	1.82	Underutilization	*	
2022	White Woman	0.89%	3.99%	22.29	Underutilization	*	
	TOTAL M/WBE	1.00%	10.01%	9.96	Underutilization	*	
	Non-M/WBE	99.00%	89.99%	110.02	Overutilization		
	African American	0.00%	3.69%	0.00	Underutilization	*	
	Asian American	0.00%	0.53%	0.00	Underutilization	*	
	Hispanic American	0.10%	1.80%	5.65	Underutilization	*	
	Native American	0.00%	0.00%	-	n/a		
2023	TOTAL MINORITY	0.10%	6.03%	1.69	Underutilization	*	
	White Woman	0.30%	3.99%	7.64	Underutilization	*	
	TOTAL M/WBE	0.41%	10.01%	4.06	Underutilization	*	
	Non-M/WBE	99.59%	89.99%	110.68	Overutilization		
	African American	0.00%	3.69%	0.00	Underutilization	*	
	Asian American	0.00%	0.53%	0.00	Underutilization	*	
	Hispanic American	0.00%	1.80%	0.00	Underutilization	*	
2024	Native American	0.00%	0.00%	-	n/a		
	TOTAL MINORITY	0.00%	6.03%	0.00	Underutilization	*	
	White Woman	2.31%	3.99%	58.05	Underutilization	*	
	TOTAL M/WBE	2.31%	10.01%	23.11	Underutilization	*	
	Non-M/WBE	97.69%	89.99%	108.56	Overutilization		
	African American	0.00%	3.69%	0.11	Underutilization	*	p < .05
	Asian American	0.00%	0.53%	0.00	Underutilization	*	p < .05
Total	Hispanic American	0.04%	1.80%	2.46	Underutilization	*	p < .05
	Native American	0.00%	0.00%	-	n/a		-
	TOTAL MINORITY	0.05%	6.03%	0.80	Underutilization	*	p < .05
	White Woman	0.59%	3.99%	14.70	Underutilization	*	p < .05
	TOTAL M/WBE	0.63%	10.01%	6.34	Underutilization	*	p < .05
	Non-M/WBE	99.37%	89.99%	110.42	Overutilization		

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APPENDIX I

OVERCONCENTRATION ANALYSIS

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX I: OVERCONCENTRATION ANALYSIS

Appendix I presents the Overconcentration Analysis conducted for Palm Beach County, focused exclusively on Construction and Professional Services (CCNA). This analysis examines prime payment Utilization by North American Industry Classification System (NAICS) codes, disaggregated by Study Groups. NAICS codes were assigned using a combination of D&B Hoovers business classification data and manual verification for unmatched firms.

The purpose of this analysis is to identify whether participation within a given NAICS code is disproportionately concentrated among a single group, potentially limiting the ability of other groups to participate meaningfully in that line of work. While this project is not governed by federal regulations, the concept of overconcentration draws on guidance from 49 CFR Part 26.33 of the U.S. Department of Transportation's Disadvantaged Business Enterprise (DBE) program, which states:

If you determine that DBE firms are so overconcentrated in a certain type of work as to unduly burden the opportunity of non-DBE firms to participate in this type of work, you must devise appropriate measures to address this overconcentration.

Although thirty-two NAICS codes were initially analyzed using County payment data and Dun & Bradstreet data to compare prime utilization to availability, none were ultimately retained in this analysis because payment distributions appeared relatively balanced across groups, suggesting no undue dominance by one group. G&S found that there was no significant overconcentration of M/WBEs or Non-M/WBEs present.⁵⁸

⁵⁸ It should be noted that there were numerous NAICS codes where Non-MWBEs dominated the field, but there was also little or no M/WBE availability in those areas.



APPENDIX J

SUBCONTRACTOR UTILIZATION BY RACE/ETHNICITY/GENDER

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX J: SUBCONTRACTOR UTILIZATION BY RACE/ETHNICITY/GENDER

In the Quantitative Analysis chapter, G&S conducted a Total Utilization analysis to observe what percentage of all dollars overall went to M/WBEs. The analysis in this appendix is of subcontractor utilization only, using subcontractor payments associated with locally funded awards.

Table J-1 indicates that Palm Beach County Subcontracting totaled \$225,217,650 across all five Industry Categories during the Study Period. Of this, \$84,666,423 (37.59%) was allocated to M/WBE firms and \$140,551,227 (62.41%) to Non-M/WBE-owned firms.

- **Construction:** M/WBE firms received \$33,391,058 (24.70%) in Subcontractor Utilization, while Non-M/WBE-owned firms received \$101,788,747 (75.30%). Within M/WBEs, MBE firms received \$21,440,052 (15.86%), and White Woman-owned firms received \$11,951,007 (8.84%).
- **Professional Services (CCNA):** Non-M/WBE-owned firms received \$17,499,661 (41.83%), and M/WBE firms were paid \$24,337,863 (58.17%). In Subcontractor Utilization, Asian American-owned firms received the largest total payment amount in the Professional Services (CCNA) Industry Category amongst all M/WBE groups.
- **Professional Services (Non-CCNA):** M/WBE and Non-M/WBE-owned firms in Subcontractor Utilization received similar payments, with \$7,292,858 (50.11%) and \$7,261,393 (49.89%), respectively.
- **Services:** Non-M/WBE-owned firms received \$2,861,398 (14.40%) while M/WBE firms received \$17,004,378 (85.60%). Among all five Industry Categories for Subcontractor Utilization, M/WBE firms achieved by far their largest percentage share of subcontractor payments in Services.
- **Goods/Commodities:** M/WBE firms were paid \$2,640,265 (19.16%), and Non-M/WBE-owned firms received \$11,140,028 (80.84%).

Table J-1: Subcontractor Utilization Analysis
in the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Industry Category
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Disparity Study

Business Ownership Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 10,982,940	\$ 5,640,441	\$ 5,149,720	\$ 519,009	\$ 1,298,852	\$ 23,590,961
Asian American	\$ 0	\$ 12,929,136	\$ 398,541	\$ 4,287,916	\$ 90,690	\$ 17,706,282
Hispanic American	\$ 10,457,112	\$ 4,279,336	\$ 101,115	\$ 11,388,171	\$ 593,452	\$ 26,819,186
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 21,440,052	\$ 22,848,912	\$ 5,649,375	\$ 16,195,096	\$ 1,982,993	\$ 68,116,428
White Women	\$ 11,951,007	\$ 1,488,951	\$ 1,643,483	\$ 809,283	\$ 657,272	\$ 16,549,995
TOTAL MWBE	\$ 33,391,058	\$ 24,337,863	\$ 7,292,858	\$ 17,004,378	\$ 2,640,265	\$ 84,666,423
White Males	\$ 101,788,747	\$ 17,499,661	\$ 7,261,393	\$ 2,861,398	\$ 11,140,028	\$ 140,551,227
TOTAL FIRMS	\$ 135,179,805	\$ 41,837,524	\$ 14,554,251	\$ 19,865,776	\$ 13,780,293	\$ 225,217,650
Business Ownership Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	8.12%	13.48%	35.38%	2.61%	9.43%	10.47%
Asian American	0.00%	30.90%	2.74%	21.58%	0.66%	7.86%
Hispanic American	7.74%	10.23%	0.69%	57.33%	4.31%	11.91%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	15.86%	54.61%	38.82%	81.52%	14.39%	30.24%
White Women	8.84%	3.56%	11.29%	4.07%	4.77%	7.35%
TOTAL MWBE	24.70%	58.17%	50.11%	85.60%	19.16%	37.59%
White Males	75.30%	41.83%	49.89%	14.40%	80.84%	62.41%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Griffin & Strong, 2025

Note: G&S uses full decimal numbers, so automatic rounding may cause differences within the tables.



APPENDIX K

EXPANDED REGRESSION ANALYSIS

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX K: EXPANDED REGRESSION ANALYSIS

Appendix K reports additional regression results (Tables 2- – 22). The regression specifications and parameter estimates attempt to identify the possibly causal role that M/WBE certification status, race, ethnicity, and gender of firm owners have on relevant private and public sector outcomes related to public contracting success in Palm Beach County. The results of the G&S regression-based disparity analysis provide a framework to rationalize observed disparities in public contracting outcomes/success with Palm Beach County between M/WBEs (firms that are certified as MBE or WBE) and Non-M/WBE owned firms (firms not certified as MBE or WBE). The regression permits an assessment of the extent to which any observed disparities in public contracting outcomes between M/WBEs and Non-M/WBE owned firms cannot be explained by differential capacities for public contracting success with Palm Beach County. The regression specifications control for a firm's public contracting capacity by including measures such as the education level of the firm owner, the age and market tenure of the firm, the size of the firm with respect to the number of employees and revenues, firm bonding capacity, willingness and ability to do business with Palm Beach County, registration status, and firm financial standing. The inclusion of these control covariates in the regression specifications permit an assessment of public contracting success/failure and related outcomes conditional on common M/WBE and Non-M/WBE owned firms public contracting capacity. As such, the regression specifications control for race-similar capacity factors across M/WBEs and Non-M/WBE owned firms. In this context, the existence of disparities in public contracting and related private sector outcomes between M/WBEs and Non-M/WBE owned firms— even after controlling for capacity— would be suggestive of M/WBE status alone being a barrier in securing public contracts and subcontracts with Palm Beach County.

Perhaps most indicative of racial/ethnic/gender conditioned disparities in public contracting outcomes in Palm Beach County, is the finding that relative to Non-M/WBEs, firms owned by African Americans, Hispanic Americans, and Asian Americans are more likely to agree that informal public contracting networks have constrained their success in winning prime awards from Palm Beach County. This indicative finding is underscored by the finding that relative to non-minority owned firms, firms owned by Women, were more likely to have never been awarded a prime or subcontract award from Palm Beach County. Firms owned by Women, African Americans, and Other Race Americans were also relatively more likely to have never had a Palm Beach County subcontract. To the extent that M/WBE compliance can raise public procurement cost on prime contracts, G&S find that firms owned by African Americans and Other Race have relatively lower compliance costs, suggesting more awards to these type of M/WBEs could be beneficial in lowering the total costs of public procurement in Palm Beach County.

A. Statistical and Econometric Framework

Methodologically, the G&S statistical and econometric analysis of possible M/WBE public contracting disparities with Palm Beach County utilizes both a standard Regression Model framework and a Categorical Regression Model (CRM) framework.⁵⁹ As the covariates measuring public contracting activity, outcomes, and other respondent characteristics in Table 1 are categorical responses to questionnaire items (e.g., public contracting bid ranges, yes, no), a CRM specifies the categories as latent variables with likelihood

⁵⁹ For overview of the CRM, See: Richard D. McKelvey and William Zavoina. 1975. "A Statistical Model for the Analysis of Ordinal Level Dependent Variables," *Journal of Mathematical Sociology*, 4: pp. 103 - 120.

thresholds that are conditioned on other conditioning covariates. In the case where there are more than two categories and the succession of categories have a natural ranking, a CRM permits a determination as to how particular covariates condition the likelihood/probability of being in the highest valued category relative to the lower-valued categories. In the case of just two categorical but not naturally ordered categories, the CRM reduces to a Binary Regression Model (BRM).⁶⁰

This analysis first uses a relevant CRM/BRM to estimate the linear predictions of particular ordinal-ranked outcomes as a function of the presumably “race-neutral” capacity of the firm. These race neutral capacity factors include for each firm: education level of the firm owner, the age of the firm, the size of the firm with respect to the number of employees and revenues, firm bonding capacity, and firm financial standing. The motivation here is to control for particular market and public sector contracting outcomes that are determined by factors other than the ethnicity/race/gender and M/WBE classification status of the firm. The estimated linear predictions are then standardized and utilized in regression specification where the regressors are the binary ethnicity/race/gender and M/WBE indicators for individuals. To control for omitted variables in the regression specifications that undermine a causal interpretation of estimated parameters, G&S estimate Fixed Effects regression specifications, that condition the unobservables on the firm’s primary line of business.⁶¹ The estimated coefficients inform the extent to which ethnicity/race/gender and M/WBE status impact the likelihood of an outcome, on average, relative to White Male -owned firms and firms not certified as M/WBEs⁶²

As survey data can be characterized by low response rates, and non-random selection into the sample which can lead to biased parameter estimates, the G&S econometric methodology accounts for this by constructing sampling weights for nonresponse and selection into the sample.⁶³ For the probability of selection into the

⁶⁰ More formally, if the latent realization of an outcome is Y^*_i ranging from $-\infty$ to $+\infty$, a structural and conditional specification is $Y^*_i = X_i \beta + \varepsilon_i$ where x is a vector of exogenous covariates, β is a vector of coefficients measuring the effects of particular covariates on the realization of Y^* , and ε_i is a random error. For categorical and ordinal outcomes $m = 1 \dots J$, $Y_i = m$ if $\tau_{m-1} \leq Y^*_i \leq \tau_m$, where the τ_i are thresholds for particular realizations $Y^*_i = m$. Conditional on X the likelihood/probability that Y takes on a particular realization is $Pr(Y_i = m | X) = \Phi(\tau_m - X\beta) - \Phi(\tau_{m-1} - X\beta)$, where Φ is the cumulative density function of ε . The G&S methodology utilizes covariates that control and/or proxy for the education level of the firm owner, the age of the firm, the size of the firm with respect to the number of employees and revenues, firm bonding capacity, and firm financial standing.

⁶¹ The primary line of business indicates one of 5 sectors in which the respondent’s firm operates in: Construction, Architecture & Engineering, Professional Services, Non-Professional Services/Other Services, and Goods. Sector membership is a firm/respondent characteristic that is a plausible source of unobserved heterogeneity, as each sector is distinct and the individual selection characteristics within each sector is likely stable. For an overview of Fixed Effects regression and their utility in enabling causal interpretations of parameter estimates, see: Matthias Breuer and Ed Dehaan, 2024. "Using and Interpreting Fixed Effects Models." *Journal of Accounting Research* 62(4): pp. 1183 - 1226.

⁶² In particular, let y^{p_i} be the predicted linear probability for a particular ordinal outcome estimate from a CRM or BRM, the regressand in the regression model is $p_i = [y^{p_i} - \mu_y]/\sigma_y$, where μ_y is the mean of y^{p_i} , and σ_y is the standard deviation of y^{p_i} .

⁶³ For an overview of nonresponse and sample selection bias in survey data, see: Robert M. Groves. 2006. "Nonresponse rates and Nonresponse Bias in Household Surveys," *International Journal of Public Opinion Quarterly* 70(5): pp. 646-675., Peytchev, Andy Peytchev. 2013. "Consequences of Survey n=Nonresponse," *ANNALS of the American Academy of Political and Social Science* 645(1): pp. 88-111.

survey, G&S estimate via probit, the probability that the respondent was referred to the G&S survey via one of six websites or digital devices. This is motivated by the plausible assumption that selection into the sample is proportional to the likelihood of being referred to complete the survey from particular websites/digital devices. The probability of nonresponse was estimated similarly based upon the probability of a respondent not providing an answer to the question identifying their North American Industry Classification (NAICS) code for their firm business classification. This is motivated by the plausible assumption that the likelihood of missingness for the NAICS code is proportional to the probability of nonresponse. Both the nonresponse and selection probabilities were estimated via probit specifications as a function of the following individual characteristics: The age of their business, race/ethnicity, and whether or not their firm is in the construction sector. The final sample weight to be deployed in the relevant regressions is the cross-product of both estimated probabilities—which assumes nonresponse and selection into the sample are independent of each other.

Statistical significance is determined on the basis of the estimated parameter/coefficient probability value—or P-value. The P-value measures the probability of obtaining the estimated parameter/coefficient assuming that the null hypothesis of the parameter/coefficient having a zero effect is true. The lower the P-value, the more credible the evidence that the parameter/coefficient evidences a non-zero effect. As a convention, G&S rejects the null hypothesis of no effect, and concludes the estimated coefficient is statistically significant as long as $P\text{-value} \leq .05$, which are highlighted in bold for all parameter estimates. In all instances, the estimated standard errors are “robust” with respect to heteroskedasticity. The R^2 is also reported as a goodness-of-fit measure.

The regression strategy also reports on two different specifications of the outcome of interest. The first one includes a broad classification of non-White firms as measured by whether or not they are certified and/or deemed as M/WBEs. Each category in this regression approach will have overlap of firms owned by particular racial/ethnic groups and Women. As this overlap might mask differences in outcomes for particular non-White minorities, Women, and non-White firms without M/WBE certifications, the second specification disaggregates the broad categories by specific racial/ethnic/gender groups. The exposition and discussion of the results are, in general, couched in terms of whether the outcome of interest suggests that broad M/WBE and race/ethnicity/gender/ status characteristics of a firm is a possible driver, or not, of public contracting and other relevant disparities with respect to non-minority owned businesses and M/WBEs in Palm Beach County. In particular, G&S does not necessarily exposit upon the statistical insignificance or significance of M/WBE or racial/ethnic/gender status in a regression if it does not inform a possible pathway for explaining any disparities in relevant private and public sector outcomes between M/WBEs and non-minority owned businesses in Palm Beach County.

B. G&S Survey of Business Owners Data

The Palm Beach County, FL, disparity analysis is based on survey data compiled by G&S, and constitutes a sample of firms from various government vendor lists and other anecdotal lists gathered during the Study process. The G&S survey was a questionnaire that captured data on firm and individual owner characteristics in Palm Beach County. Respondents completed an online survey.

Table 1 reports, for the 368 survey responses captured, a statistical summary of the variables that are relevant to the G&S regression-based analysis of outcomes relevant to, and informative of, public procurement disparities in Palm Beach County. The variables marked with an asterisk are those utilized as factors determining a firm's "race-neutral capacity to compete in both the private and public sector of Palm Beach County. All responses are relevant for the 1/1/19 – 12/31/23 time period.

**Table 1: Statistical Summary of Variables
Palm Beach County 2025 Disparity Study**

Variable	Description	Mean	Standard Deviation	Number of Observations
Firm entered market within past five years	Binary Variable: 1 = yes	.177	.382	368
Number of times denied a commercial bank loan since 2019	Ordinal Variable: 1 = 0; 2 = 1 – 10; 3 = 11 – 25; 4 = 26 – 50; 5 = 51 – 100; 6 = Over 100	1.147	.631	368
Number of prime bids submitted on Palm Beach County projects since 2019	Ordinal Variable: 1 = 0; 2 = 1 – 10; 3 = 11 – 25; 4 = 26 – 50; 5 = 51 – 100; 6 = Over 100	1.351	.973	368
Number of Palm Beach County prime contracts awarded since 2019	Ordinal Variable: 1 = 0; 2 = 1 – 10; 3 = 11 – 25; 4 = 26 – 50; 5 = 51 – 100; 6 = Over 100	1.125	.742	368
Number of Palm Beach County subcontracts awarded since 2019	Ordinal Variable: 1 = 0; 2 = 1 – 10; 3 = 11 – 25; 4 = 26 – 50; 5 = 51 – 100; 6 = Over 100	1.19	.813	368
Neither Prime or Subcontract awarded since 2019	Binary Variable: 1 = Yes	.614	.487	368
Firm has experienced perceived private sector discrimination	Binary Variable: 1 = Yes	.120	.325	368
Firm has experienced perceived discrimination at Palm Beach County	Binary Variable: 1 = Yes	.190	.393	368
Owner has more than 20 years of experience	Binary Variable: 1 = Yes	.644	.479	368
Firm has more than 10 employees*	Binary Variable: 1 = Yes	.190	.393	368
Firm owner has a baccalaureate/post-graduate degree*	Binary Variable: 1 = Yes	.416	.494	368
Firm gross revenue greater than \$1,500,000*	Binary Variable: 1 = Yes	.120	.325	368
Firm bonding limit greater than \$2,500,000*	Binary Variable: 1 = Yes	.016	.127	368
Financing is a Barrier to Submitting* Bids and Securing Contracts From Palm Beach County	Binary Variable: 1 = Yes	.881	.325	368
Performance Bonds are a Barrier to Submitting* Bids and Securing Contracts From Palm Beach County	Binary Variable: 1 = Yes	.905	.294	368
Firm is in the Construction Sector	Binary Variable: 1 = Yes	.114	.318	368
Firm is registered with Palm Beach County*	Binary Variable: 1 = Yes	.897	.305	368
Firm is a certified Minority Business Enterprise	Binary Variable: 1 = Yes	.319	.467	188
Firm is a certified Woman Business enterprise	Binary Variable: 1 = Yes	.037	.19	188
Firm is a certified Small Business Enterprise	Binary Variable: 1 = Yes	.106	.309	188
Majority Firm Owner is African American	Binary Variable: 1 = Yes	.299	.458	368
Majority Firm Owner is Hispanic American	Binary Variable: 1 = Yes	.166	.372	368
Majority Firm Owner is Asian American	Binary Variable: 1 = Yes	.031	.171	368
Majority Firm Owner is Multi-racial	Binary Variable: 1 = Yes	.033	.178	368
Majority Firm Owner is Other Race	Binary Variable: 1 = Yes	.027	.163	368
Majority Firm Owner is a Woman	Binary Variable: 1 = Yes	.582	.494	368
Majority Firm Owner is White	Binary Variable: 1 = Yes	.446	.498	368
Firms utilize M/WBEs on contracts only when required	Binary Variable: 1 = Yes	.41	.493	368
Prime Contractors ask M/WBEs for subcontract quotes but don't review them	Binary Variable: 1 = Yes	.353	.479	368
Exclusion from informal contracting networks prevents winning prime awards	Binary Variable: 1 = Yes	.493	.501	201
Had to bid more on prime contract to comply with M/WBE guidelines	Binary Variable: 1 = Yes	.122	.328	115
Had to take higher bid for subcontract to comply with M/WBE guidelines	Binary Variable: 1 = Yes	.043	.205	115

*Covariate utilized as a proxy for firm capacity
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C. M/WBE Status and Firm Entry in Palm Beach County

To determine if M/WBE status is a barrier to the formation of new businesses in Palm Beach County, Tables 2 and 3 report, for each of the distinct M/WBEs and owner self-reported race/ethnicity in the G&S sample, the estimated parameters of an Ordinary Least Squares (OLS) Regression with the standardized linear probability of being a new firm as the dependent variable.

The statistically significant parameter estimates in Table 2 suggest that certified Women-owned firms are relatively less likely to be new firms in Palm Beach County. When disaggregated by race/gender/ethnicity status, the statistical significance for the estimated coefficients in Table 3 suggest that except for firms owned by Asian Americans—who are relatively less likely to be new entrants—firms owned by African Americans and Hispanic Americans are relatively more likely to be new firms. This suggests that any public contracting disparities between Non-M/WBEs and WBEs, and those firms owned by African Americans and Hispanic Americans can possibly be explained by lower levels of market experience necessary for competing successfully for public procurement.

**Table 2: Fixed Effects Regression Parameter Estimates-Firm Entry:
Firm Certification Type and New Firm Entry Probabilities
in Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction that firm is a new entrant to market		
Firm is a Certified Minority business enterprise: (Binary)	0.1673	0.4061
Firm is a Certified Woman business enterprise: (Binary)	-0.6869	0.0201
Firm is a Certified Small business enterprise: (Binary)	-0.0527	0.0689
Constant	-0.1469	0.0415
Number of Observations	183	
R ²	0.0754	

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**Table 3: Fixed Effects Regression Parameter Estimates-Firm Entry:
Firm Owner Race/Ethnicity/Gender and New Firm Entry Probabilities
in Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction that firm is a new entrant to market		
Firm is African American-owned: (Binary)	0.5637	0.0091
Firm is Hispanic American-owned: (Binary)	0.3395	0.0309
Firm is Asian American-owned: (Binary)	-0.1591	0.0321
Firm is Bi/Multiracial-owned: (Binary)	0.3268	0.3272
Firm is other race-owned: (Binary)	0.2976	0.2113
Firm is Woman-owned: (Binary)	0.0553	0.6481
Constant	-0.2823	0.0241
Number of Observations	362	
R ²	0.0949	

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D. M/WBE Status and Number of Prime Bid Submissions in Palm Beach County

One reason disparities in public contracting outcomes between M/WBEs and Non-M/WBEs could exist is that relative to Non-M/WBEs is that M/WBEs may be less interested in, and/or less likely to submit bids for public contracts. To determine if this is the case in Palm Beach County, Tables 4 and 5 report regression parameter estimates with the linear prediction of number of prime bid submissions as the dependent variable.

The statistically insignificant parameter estimates in Table 4 suggest that there are no differences in the relative likelihood of M/WBEs to submit prime bids in Palm Beach County. When disaggregating by race/ethnicity/gender/status, the statistically significant parameter estimates in Table 5 indicate that firms owned by Hispanic Americans are more likely to submit prime bids relative to Non-M/WBEs. This suggests that any disparities in public procurement outcomes between firms owned by these type of M/WBEs and non-minority owned firms in Palm Beach County cannot be explained, at least in part, by their relatively lower prime bid submission rates.

**Table 4: Fixed Effects Regression Parameter Estimates-Prime Submissions:
Firm Certification Type and Number of Prime Bid Submissions
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of number of prime bid submissions		
Firm is a Certified Minority business enterprise: (Binary)	0.1489	0.4916
Firm is a Certified Woman business enterprise: (Binary)	0.4150	0.5406
Firm is a Certified Small business enterprise: (Binary)	0.2031	0.4562
Constant	0.1465	0.0395
Number of Observations	188	
R^2	0.0846	

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**Table 5: Fixed Effects Regression Parameter Estimates -Prime Submissions:
Firm Owner Race/Ethnicity/Gender and Number of Prime Bid Submissions
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of number of prime bid submissions		
Firm is African American-owned: (Binary)	0.0665	0.7115
Firm is Hispanic American-owned: (Binary)	0.2104	0.0387
Firm is Asian American-owned: (Binary)	0.0867	0.4473
Firm is Bi/Multiracial-owned: (Binary)	0.0657	0.9042
Firm is other race-owned: (Binary)	0.0597	0.6708
Firm is Woman-owned: (Binary)	-0.2909	0.0344
Constant	0.1299	0.3532
Number of Observations	368	
R^2	0.0564	

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E. M/WBE Status and Number of Prime Contracts Awarded in Palm Beach County

As the submission of prime bids is an input to prime bid success, notwithstanding any disparities in prime bid submission rates between M/WBEs and non-minority owned businesses, are there disparities in public contracting success conditional upon unobserved submission rates? To explore this in the case in the Palm Beach County, Tables 6 and 7 report regression parameter estimates where the dependent variable is the linear prediction of number of prime contracts awarded.

Relative to Non-M/WBEs, the parameter estimates in Table 6 suggest that firms classified/certified as M/WBE are neither more or less likely to win prime contracts in with Palm Beach County. When disaggregating by the race/ethnicity/gender status of firm owners in Table 7, the estimated parameters with statistical significance suggest that relative to non-minority owned firms, firms owned by Women are less likely to win prime contract awards from Palm Beach County. This suggests that at least for M/WBEs in general, there are no prime contract award disparities between them and Non-M/WBEs with Palm Beach County.

**Table 6: Fixed Effects Regression Parameter Estimates -Prime Awards:
Firm Certification Type and Number of Prime Contracts Awarded
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of number of prime contracts awarded		
Firm is a Certified Minority business enterprise: (Binary)	0.1273	0.5632
Firm is a Certified Woman business enterprise: (Binary)	0.5283	0.4473
Firm is a Certified Small business enterprise: (Binary)	0.2022	0.5261
Constant	0.1752	0.0313
Number of Observations	188	
R^2	0.0933	

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**Table 7: Fixed Effects Regression Parameter Estimates Prime Awards:
Firm Owner Race/Ethnicity/Gender and Number of Prime Contracts Awarded
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of number of prime contracts awarded		
Firm is African American-owned: (Binary)	-0.1187	0.4083
Firm is Hispanic American-owned: (Binary)	0.0949	0.4686
Firm is Asian American-owned: (Binary)	0.0704	0.6030
Firm is Bi/Multiracial-owned: (Binary)	0.0844	0.8525
Firm is other race-owned: (Binary)	-0.0686	0.6373
Firm is Woman-owned: (Binary)	-0.2676	0.0216
Constant	0.1993	0.0329
Number of Observations	368	
R^2	0.0638	

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F. M/WBE Status and Number of Subcontracts Awarded in Palm Beach County

To the extent that submitting and winning public contract bids requires experience, which can also be gained through subcontracting with lead prime firms with Palm Beach County contracts, M/WBEs can potentially become more frequent and successful prime contract bidders by acquiring experience as subcontractors. As such, the low-frequency of prime bid submission and lower likelihood of being a prime contractor by M/WBEs need not be a concern if they are gaining valuable subcontracting experience that will translate into high frequency contract bids and success later. To explore if this is the case in Palm Beach County, Tables 8 and 9 report regression parameter estimates where the dependent variable is the linear prediction of number of subcontracts awarded.

Relative to Non-M/WBEs, the parameter estimates in Table 8 suggest that certified Woman-owned firms are relatively more likely to win subcontractor awards with Palm Beach County. When disaggregating by the race/ethnicity/gender status of firm owners in Table 9, the estimated parameters with statistical significance suggest that relative to White Male-owned firms, firms owned by African Americans, Other Race Americans, and Women are less likely to win a subcontract award from Palm Beach County. This suggests that at least for these types of Minority- and Woman-owned firms—that are not certified—any disparities between them and White Male-owned firms in public contracting awards can be explained, at least in part, by less contracting experience acquired through subcontracting.

**Table 8: Fixed Effects Regression Parameter Estimates-Subcontract Awards:
Firm Certification Type and Number of Subcontracts Awarded
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of number of subcontracts awarded		
Firm is a Certified Minority business enterprise: (Binary)	-0.0737	0.6142
Firm is a Certified Woman business enterprise: (Binary)	0.0931	0.0367
Firm is a Certified Small business enterprise: (Binary)	-0.0620	0.8310
Constant	0.1728	0.0149
Number of Observations	188	
R^2	0.1023	

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**Table 9: Fixed Effects Regression Parameter Estimates-Subcontract Awards:
Firm Owner Race/Ethnicity/Gender and Number of Subcontracts Awarded
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of number of subcontracts awarded		
Firm is African American-owned: (Binary)	-0.4630	0.0414
Firm is Hispanic American-owned: (Binary)	-0.1263	0.2374
Firm is Asian American-owned: (Binary)	-0.2132	0.2118
Firm is Bi/Multiracial-owned: (Binary)	-0.1322	0.6988
Firm is other race-owned: (Binary)	-0.4874	0.0314
Firm is Woman-owned: (Binary)	-0.2006	0.0023
Constant	0.3060	0.0019
Number of Observations	368	
R ²	0.0935	

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G. M/WBE Status and No Prime or Subcontract Awarded in Palm Beach County

As the results in Tables 8 and 9 reflect only the effect of M/WBE status on the number of Palm Beach County contracts and subcontracts, it may obscure the effects and distribution of zero outcomes (i.e., never having secured a Palm Beach County prime contract and subcontract). Tables 10 and 11 report Logit parameter estimates where the dependent variable is whether the firm “never” won since 2017 a prime contract or subcontract from Palm Beach County. The estimated parameters with statistical significance in Table 10 suggest that relative to Non-M/WBEs, certified M/WBEs⁶⁴ are neither more or less likely to have never won a prime contract or subcontract with Palm Beach County. Disaggregating by race/ethnicity/gender status, the parameter estimates with statistical significance in Table 11 suggest that firms owned by Women are more likely to have “never” been a prime contractor or subcontractor with Palm Beach County. To the extent that success in public contracting is proportional to having prior prime contracts or subcontracts, the parameter estimates in Tables 10 and 11 suggest that for firms owned by certified WBEs, any contracting disparities between such firms and White Male-owned firms can possibly be explained by their relative disadvantage in having secured prior prime contracts or subcontracts from Palm Beach County.

**Table 10: Fixed Effects Regression Parameter Estimates:
Firm Certification Type and No Prime or Subcontracts Awarded In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of no prime or subcontracts awarded		
Firm is a Certified Minority business enterprise: (Binary)	-0.0303	0.5922
Firm is a Certified Woman business enterprise: (Binary)	-0.2631	0.1308
Firm is a Certified Small business enterprise: (Binary)	-0.0710	0.5027
Constant	0.2567	0.0003
Number of Observations	188	
R ²	0.0873	

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⁶⁴ G&S queried by self-identified as Minority- and Woman-owned and also requested whether firms were certified as MBE or WBE.

**Table 11: Fixed Effects Regression Parameter Estimates:
Firm Owner Race/Ethnicity/Gender and No Prime or Subcontracts Awarded
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of no prime or subcontracts awarded		
Firm is African American-owned: (Binary)	0.0341	0.5304
Firm is Hispanic American-owned: (Binary)	-0.0081	0.8121
Firm is Asian American-owned: (Binary)	-0.0337	0.3614
Firm is Bi/Multiracial-owned: (Binary)	-0.0549	0.6598
Firm is other race-owned: (Binary)	0.0073	0.8759
Firm is Woman-owned: (Binary)	0.0696	0.0313
Constant	0.2433	0.0013
Observations	368	
R^2	0.0487	

Griffin & Strong, 2025

H. M/WBE Status and Perceived Discrimination in the Palm Beach County Private Sector

Disparate contracting and subcontracting outcomes between Minority- and Women-owned firms and White Male-owned firms could reflect, at least in part, the effects of discrimination against them by private sector firms, which discourages their entry into the market, and/or undermines their capacity to compete for public sector projects. In Tables 12 and 13, G&S reports OLS parameter estimates of the effects of M/WBE status on the standardized probability having experienced discrimination—in particular the perception of having experienced discrimination in the private sector of Palm Beach County.

If perceptions of discrimination correlate positively with actual discrimination in the private sector, the estimated parameters with statistical significance in Table 12 suggest that relative to Non-M/WBEs, certified M/WBEs are neither more or less likely to experience perceived discrimination in the private sector of Palm Beach County. When disaggregated by the race/ethnicity/gender status of firm owners, the estimated parameters with statistical significance in Table 13 suggest that relative to White Male-owned, firms owned by Bi/Multiracial Americans are more likely to experience perceived discrimination in the private sector of Palm Beach County. To the extent that private sector discrimination can undermine the capacity of M/WBEs to compete for public sector procurement, this suggests that, at least for firms owned by Bi/Multiracial Americans, private sector discrimination may explain, at least in part, public contracting disparities between these type of M/WBEs and White Male-owned firms.

Table 12: Fixed Effects Regression Parameter Estimates-Private Sector Discrimination Firm Certification Type and Perceived Discrimination in the Palm Beach County Private Sector

Palm Beach County 2025 Disparity Study

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of experiencing perceived discrimination in the private sector		
Firm is a Certified Minority business enterprise: (Binary)	0.1947	0.3837
Firm is a Certified Woman business enterprise: (Binary)	-1.1044	0.4071
Firm is a Certified Small business enterprise: (Binary)	-0.0472	0.8682
Constant	-0.0152	0.8923
Number of Observations	188	
R^2	0.0472	

Griffin & Strong, 2025

Table 13: Fixed Effects Regression Parameter Estimates-Private Sector Discrimination Firm Owner Race/Ethnicity/Gender and Perceived Discrimination in the Palm Beach County Private Sector

Palm Beach County 2025 Disparity Study

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of experiencing perceived discrimination in the private sector		
Firm is African American-owned: (Binary)	0.0371	0.6846
Firm is Hispanic American-owned: (Binary)	-0.2185	0.3971
Firm is Asian American-owned: (Binary)	-0.1358	0.4522
Firm is Bi/Multiracial-owned: (Binary)	0.4094	0.0257
Firm is other race-owned: (Binary)	0.1552	0.3573
Firm is Woman-owned: (Binary)	-0.0864	0.4374
Constant	0.0732	0.4305
Number of Observations	368	
R^2	0.0153	

Griffin & Strong, 2025

I. M/WBE Status and Perceived Discrimination at Palm Beach County

Disparate contracting and subcontracting outcomes between White Male-owned firms and Minority and Women-owned firms could reflect, at least in part, the effects of discrimination against them by Palm Beach County, which conditions their entry into the market and opportunities for success at Palm Beach County.⁶⁵ In Tables 14 and 15, G&S reports OLS parameter estimates of the the effects of Minority and Woman-owned

⁶⁵ For the effects that discrimination can have upon the entry and performance of minority-owned firms. See: Borjas, George J., and Stephen G. Bronars. 1989. "Consumer Discrimination and Self-employment." *Journal of Political Economy*, 97: pp. 581-605.

status on the standardized probability of having experienced discrimination—in particular the perception of having experienced discrimination at Palm Beach County.

If perceptions of discrimination correlate positively with actual discrimination at Palm Beach County, the estimated parameters with statistical significance in Table 14 suggest that relative to non-minority owned firms, certified Small business enterprises are less likely to experience perceived discrimination at Palm Beach County. When disaggregated by the race/ethnicity/gender status of firm owners, the estimated parameters with statistical significance in Table 15 suggest that relative to White Male-owned firms, firms owned by African Americans, Hispanic Americans, and Bi/Multiracial Americans are more likely to experience perceived discrimination at Palm Beach County. To the extent that discrimination at Palm Beach County can undermine the capacity and willingness of Minority- and Woman-owned firms to compete for public sector procurement, this suggests that discrimination at Palm Beach County can explain, at least in part, public contracting disparities between White Male-owned firms and those owned by African Americans, Hispanic Americans, and Bi/Multiracial Americans.

**Table 14: Fixed Effects Regression Parameter Estimates-Palm Beach County, FL
Discrimination
Firm Certification Type and Perceived Discrimination at Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of experiencing perceived discrimination at Palm Beach County, FL		
Firm is a Certified Minority business enterprise: (Binary)	0.2564	0.2381
Firm is a Certified Woman business enterprise: (Binary)	0.2546	0.4512
Firm is a Certified Small business enterprise: (Binary)	-0.2426	0.0089
Constant	0.0621	0.3930
Number of Observations	188	
R ²	0.0496	

Griffin & Strong, 2025

**Table 15: Fixed Effects Regression Parameter Estimates-Palm Beach County, FL
Discrimination
Firm Owner Race/Ethnicity/Gender and Perceived Discrimination at Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of experiencing perceived discrimination at Palm Beach County, FL		
Firm is African American-owned: (Binary)	0.3016	0.0393
Firm is Hispanic American-owned: (Binary)	0.2954	0.0230
Firm is Asian American-owned: (Binary)	-0.2319	0.1327
Firm is Bi/Multiracial-owned: (Binary)	0.7424	0.0029
Firm is other race-owned: (Binary)	-0.0790	0.6910
Firm is Woman-owned: (Binary)	0.0795	0.5899
Constant	-0.1477	0.2047
Number of Observations	368	
R ²	0.0508	

Griffin & Strong, 2025

J. Non-Minority Prime Contractor Use of M/WBEs in Palm Beach County

To the extent that Palm Beach County requires prime contractors to utilize M/WBEs as subcontractors, a counterfactual worth considering is how effective such a requirement is. In particular, in the absence of such a policy, M/WBE subcontractors in Palm Beach County could fare worse, as Lovaton et al (2012) found in the case of New Jersey's implementation of a race-neutral public procurement program.⁶⁶ To explore this, Tables 16 and 17 report OLS parameter estimates where the dependent variable is the standardized linear probability that the firm owner agrees that non-minority prime contractors only use M/WBEs when required.

The estimated parameters with statistical significance in Table 16 suggest that that relative to Non-M/WBEs-, firms certified Minority-owned are more or less likely to agree that Non-Minority prime contractors only use M/WBEs when required. When disaggregated by the race/ethnicity/gender status of firm owners, the the estimated parameters with statistical significance in Table 17 suggest that relative to White Male-owned, firms owned by Hispanic Americans and Bi/Multiracial Americans are more likely to agree that Non-Minority prime contractors only use M/WBEs when required. This suggests that, at least for these type of M/WBEs, subcontracting disparities between them and non-minority owned firms can be explained, at least in part, by the lack of enforcing M/WBE participation requirements on Palm Beach County public contract awards to non-minority owned firms.

**Table 16: Fixed Effects Regression Parameter Estimates:
Firm Certification Type and Solicitation/Use of M/WBEs By Non-Minority Prime
Contractors
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of agreeing that non-minority prime contractors only use M/WBEs when required		
Firm is a Certified Minority business enterprise: (Binary)	0.2299	0.0408
Firm is a Certified Woman business enterprise: (Binary)	0.3380	0.2152
Firm is a Certified Small business enterprise: (Binary)	-0.0049	0.9853
Constant	0.1176	0.0358
Number of Observations	188	
R^2	0.0656	

Griffin & Strong, 2025

⁶⁶ See: Lovaton Davila, R., Ha, Inhyuck S., and Myers, Samuel L, 2012. Affirmative Action Retrenchment in Public Procurement and Contracting. *Applied Economics Letters*, 19(18), pp.1857-1860.

**Table 17: Fixed Effects Regression Parameter Estimates:
Firm Owner Race/Ethnicity/Gender and Solicitation/Use of M/WBEs By Non-Minority
Prime Contractors In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of agreeing that non-minority prime contractors only use M/WBEs when required		
Firm is African American-owned: (Binary)	0.1933	0.2151
Firm is Hispanic American-owned: (Binary)	0.3444	0.0117
Firm is Asian American-owned: (Binary)	-0.2479	0.1094
Firm is Bi/Multiracial-owned: (Binary)	0.5633	0.0429
Firm is other race-owned: (Binary)	-0.0700	0.7253
Firm is Woman-owned: (Binary)	-0.1739	0.1965
Constant	0.0129	0.9057
Number of Observations	368	
R^2	0.0555	

Griffin & Strong, 2025

K. M/WBE Status and Formal/Informal Contracting Networks in Palm Beach County

Similar to discrimination at Palm Beach County, the existence of formal/informal public contracting networks that confer advantages to insiders in securing public contracts and subcontracts, and exclude M/WBEs, could possibly have an adverse effect on M/WBEs ability to secure public contracts and subcontracts with Palm Beach County.⁶⁷ To explore the role of such formal/informal networks, Tables 18 and 19 report OLS parameter estimates where the dependent variable is the standardized linear probability that the firm owner agrees that exclusion from informal contracting networks prevented them from winning prime awards with Palm Beach County.

Relative to non-minority owned firms, the parameter estimates in Table 18 suggest that firms certified as M/WBEs are more likely to perceive that informal network access matters for contracting success with Palm Beach County. When disaggregated by the race/ethnicity/gender status of firm owners, the estimated parameters in Table 19 suggest that relative to White Male-owned firms, firms owned by African Americans, Hispanic Americans, and Asian Americans are more likely to agree informal networks are important for public contracting success with Palm Beach County. This suggests that, at least for these type of M/WBEs, contracting disparities between them and White Male-owned firms can be explained, at least in part, by their exclusion from Palm Beach County public contracting networks that reduces their ability to secure prime contracts and subcontracts.

⁶⁷ For evidence that access to informal networks can increase the likelihood of success in securing public contracting See: Sedita, Silvia Rita, and Roberta Apa. 2015. "The Impact of Inter-organizational Relationships on Contractors' Success in Winning Public Procurement Projects: The Case of the Construction Industry in the Veneto Region." *International Journal of Project Management*, 33: pp. 1548-1562.

**Table 18: Fixed Effects Regression Parameter Estimates:
Firm Certification Type and Solicitation/Use of M/WBEs By Non-Minority Prime
Contractors
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of agreeing that exclusion from informal contracting networks prevents winning prime awards		
Firm is a Certified Minority business enterprise: (Binary)	0.3248	0.0174
Firm is a Certified Woman business enterprise: (Binary)	0.3320	0.2691
Firm is a Certified Small business enterprise: (Binary)	-0.0900	0.7293
Constant	0.1291	0.0240
Number of Observations	183	
R^2	0.0436	

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**Table 19: Fixed Effects Regression Parameter Estimates:
Firm Owner Race/Ethnicity/Gender and Solicitation/Use of M/WBEs By Non-Minority
Prime Contractors In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of agreeing that exclusion from informal contracting networks prevents winning prime awards		
Firm is African American-owned: (Binary)	0.3322	0.0361
Firm is Hispanic American-owned: (Binary)	0.2475	0.0354
Firm is Asian American-owned: (Binary)	0.2799	0.0287
Firm is Bi/Multiracial-owned: (Binary)	0.4804	0.3286
Firm is other race-owned: (Binary)	0.1097	0.4525
Firm is Woman-owned: (Binary)	-0.0379	0.6205
Constant	-0.0737	0.2464
Number of Observations	362	
R^2	0.0272	

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L. M/WBE Compliance and Prime Contracting Cost In Palm Beach County

To the extent that compliance with M/WBE public procurement programs causes prime bidders to markup and or ultimately use M/WBE contractors—as a result of additional search costs associated with finding M/WBE subcontractors—M/WBE compliance could cause higher prime bids, which increase the cost of public procurement.⁶⁸ To explore this possibility Tables 20 and 21 report OLS parameter estimates where the dependent variable is the standardized linear probability that the firm owner had to bid more on prime contracts to comply with M/WBE guidelines at Palm Beach County.

Relative to Non-M/WBEs- the parameter estimates in Table 20 suggest that there is no difference between Non-M/WBE and certified M/WBEs that compliance with M/WBE goals increases their prime bids on Palm Beach County projects. When disaggregated by the race/ethnicity/gender status of firm owners, the estimated parameters in Table 21 suggest that relative to White Male-owned firms, firms owned by African Americans and Other Race Americans are less likely to agree that compliance with M/WBE goals increases their prime bids on Palm Beach County projects. This suggests that to the extent that White Male-owned firms actually increase their bids to comply with M/WBE guidelines, prime awards to M/WBEs, such as those owned by African Americans and Other Race Americans, can reduce any costs of public procurement associated with M/WBE compliance in Palm Beach County.

**Table 20: Fixed Effects Regression Parameter Estimates:
Firm Certification Type and Effect of M/WBE Compliance On Prime Bids
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of firm owner had to bid more on prime contracts to comply with M/WBE guidelines		
Firm is a Certified Minority business enterprise: (Binary)	0.1077	0.6089
Firm is a Certified Woman business enterprise: (Binary)	0.8211	0.2081
Firm is a Certified Small business enterprise: (Binary)	-0.0501	0.8845
Constant	0.0703	0.0411
Number of Observations	188	
R^2	0.0433	

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⁶⁸ For a consideration of how the cost of procurement costs can be sensitive to compliance with M/WBE subcontracting requirements, See: Benjamin V. Rosa. 2024. "Subcontracting Requirements and the Cost of Government Procurement," *RAND Journal of Economics* 55(1): pp. 3-32.

**Table 21: Fixed Effects Regression Parameter Estimates:
Firm Owner Race/Ethnicity/Gender and the Effect of M/WBE Compliance On Prime Bids
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of firm owner had to bid more on prime contracts to comply with M/WBE guidelines		
Firm is African American-owned: (Binary)	-0.3767	0.0472
Firm is Hispanic American-owned: (Binary)	-0.1602	0.4051
Firm is Asian American-owned: (Binary)	0.0570	0.3282
Firm is Bi/Multiracial-owned: (Binary)	0.0411	0.8741
Firm is other race-owned: (Binary)	-0.4181	0.0415
Firm is Woman-owned: (Binary)	0.0342	0.7751
Constant	0.1314	0.2721
Number of Observations	368	
R^2	0.0521	

Griffin & Strong, 2025

M. M/WBE Compliance and Subcontracting Cost In Palm Beach County

To the extent that compliance with M/WBE public procurement programs causes winners of prime contracts to markup and or ultimately use M/WBE contractors—as a result of additional search costs associated with finding M/WBE subcontractors—M/WBE compliance could cause prime contractors to pay more for subcontractors. This could increase their operating expenses, causing them to place higher bids in subsequent pursuit of public contracts, which increases the cost of public procurement. To explore this possibility, Tables 22 and 23 report OLS parameter estimates where the dependent variable is the standardized linear probability that the firm owner had to make a higher bid on subcontracts to comply with M/WBE guidelines at Palm Beach County

Relative to non-minority owned firms, the parameter estimates in Table 22 suggest that there is no difference between Non-M/WBE and certified M/WBEs that compliance with M/WBE goals increases their subcontracting costs on Palm Beach County projects. When disaggregated by the race/ethnicity/gender status of firm owners, the estimated parameters in Table 23 suggest that relative to White Male-owned firms, firms owned by Hispanic Americans are more likely to agree that compliance with M/WBE goals increases their subcontracting costs on Palm Beach County projects. This suggests that in Palm Beach County, only firms owned by Hispanic Americans are cost-burdened by M/WBE compliance guidelines in their subcontracting costs.

**Table 22: Fixed Effects Regression Parameter Estimates:
Firm Certification Type and Solicitation/Use of M/WBEs By Non-Minority Prime
Contractors
In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of firm owner making higher bid for subcontract to comply with M/WBE guidelines		
Firm is a Certified Minority business enterprise: (Binary)	0.1410	0.7423
Firm is a Certified Woman business enterprise: (Binary)	0.1290	0.4750
Firm is a Certified Small business enterprise: (Binary)	0.0962	0.7112
Constant	0.1031	0.0374
Number of Observations	81	
R^2	0.0177	

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**Table 23: Fixed Effects Regression Parameter Estimates:
Firm Owner Race/Ethnicity/Gender and Solicitation/Use of M/WBEs By Non-Minority
Prime Contractors In Palm Beach County
Palm Beach County 2025 Disparity Study**

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of firm owner making higher bid for subcontract to comply with M/WBE guidelines		
Firm is African American-owned: (Binary)	0.2146	0.2682
Firm is Hispanic American-owned: (Binary)	0.4014	0.0039
Firm is Asian American-owned: (Binary)	-0.1511	0.6948
Firm is Bi/Multiracial-owned: (Binary)	0.1008	0.6928
Firm is other race-owned: (Binary)	0.3159	0.1998
Firm is Woman-owned: (Binary)	-0.0448	0.7828
Constant	-0.0332	0.0171
Number of Observations	166	
R^2	0.0318	

Griffin & Strong, 2025



APPENDIX L

SURVEY OF BUSINESS OWNERS

**PALM BEACH COUNTY, FL
2025 DISPARITY STUDY**

APPENDIX L: PALM BEACH COUNTY 2025 DISPARITY STUDY SURVEY OF BUSINESS OWNERS

A brief note on how tables are calculated

Duplicate responses have been removed. Duplicate responses were removed based on businesses having either the same email address or same business name.

The total count of responses for each question includes only those participants who responded to that question. Participants who skipped or were not given a question are not included.

Table 1. Is your company a not-for-profit organization or a government entity?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
No	114	12	9	61	5	1	65	101	368
	100 %	100 %	100 %	100 %	100 %	100 %	100 %	100 %	100 %
Total	114	12	9	61	5	1	65	101	368

Table 2. Do you believe your firm is ready, willing, and able to do business as a prime contractor/vendor with Palm Beach County?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	108	9	8	53	5	1	52	87	323
	94.7 %	75 %	88.9 %	86.9 %	100 %	100 %	80 %	86.1 %	87.8 %
No	6	3	1	8	0	0	13	14	45
	5.3 %	25 %	11.1 %	13.1 %	0 %	0 %	20 %	13.9 %	12.2 %
Total	114	12	9	61	5	1	65	101	368

Table 3. Do you believe your firm is ready, willing, and able to do business as a subcontractor with prime contractors/vendors of Palm Beach County?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	111	10	8	54	4	1	52	87	327
	97.4 %	83.3 %	88.9 %	88.5 %	80 %	100 %	80 %	86.1 %	88.9 %
No	3	2	1	7	1	0	13	14	41
	2.6 %	16.7 %	11.1 %	11.5 %	20 %	0 %	20 %	13.9 %	11.1 %
Total	114	12	9	61	5	1	65	101	368

Table 4. In which of the following industry categories would you place your business?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Construction (horizontal or vertical construction)	17	0	0	9	1	0	11	4	42
	14.9 %	0 %	0 %	14.8 %	20 %	0 %	16.9 %	4 %	11.4 %
Professional Services (CCNA)	4	2	1	6	0	1	8	7	29
	3.5 %	16.7 %	11.1 %	9.8 %	0 %	100 %	12.3 %	6.9 %	7.9 %
Professional Services (non-CCNA)	45	2	4	10	2	0	8	21	92
	39.5 %	16.7 %	44.4 %	16.4 %	40 %	0 %	12.3 %	20.8 %	25 %
Services (all services not listed above)	39	8	3	29	0	0	27	38	144
	34.2 %	66.7 %	33.3 %	47.5 %	0 %	0 %	41.5 %	37.6 %	39.1 %
Goods/Commodities (all tangible items)	9	0	1	7	2	0	11	31	61
	7.9 %	0 %	11.1 %	11.5 %	40 %	0 %	16.9 %	30.7 %	16.6 %
Total	114	12	9	61	5	1	65	101	368

Table 5. How long has your company been in operation?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Under 1 year	3	0	0	0	0	0	2	2	7
	2.6 %	0 %	0 %	0 %	0 %	0 %	3.1 %	2 %	1.9 %
1-5 years	34	1	3	9	2	0	7	9	65
	29.8 %	8.3 %	33.3 %	14.8 %	40 %	0 %	10.8 %	8.9 %	17.7 %
6-10 years	38	1	4	20	0	1	10	16	90
	33.3 %	8.3 %	44.4 %	32.8 %	0 %	100 %	15.4 %	15.8 %	24.5 %
11-15 years	15	2	1	13	0	0	12	14	57
	13.2 %	16.7 %	11.1 %	21.3 %	0 %	0 %	18.5 %	13.9 %	15.5 %
16-20 years	6	3	1	6	1	0	5	10	32
	5.3 %	25 %	11.1 %	9.8 %	20 %	0 %	7.7 %	9.9 %	8.7 %
Over 20 years	18	5	0	13	2	0	29	50	117
	15.8 %	41.7 %	0 %	21.3 %	40 %	0 %	44.6 %	49.5 %	31.8 %
Total	114	12	9	61	5	1	65	101	368

Table 6. Is at least 51% percent of your company owned and controlled by a person(s) who identifies as a woman?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	67	6	5	32	3	0	0	101	214
	58.8 %	50 %	55.6 %	52.5 %	60 %	0 %	0 %	100 %	58.2 %
No	47	6	4	29	2	1	65	0	154
	41.2 %	50 %	44.4 %	47.5 %	40 %	100 %	100 %	0 %	41.8 %
Total	114	12	9	61	5	1	65	101	368

PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table 7. Which of the following categories would you consider to be the race or ethnic origin of the person(s) that owns at least 51% of the company identify as? Please note that "Bi-racial" means that the single majority owner is of mixed race. "Multiple Minority

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
White	0	0	0	0	0	0	64	100	164
	0 %	0 %	0 %	0 %	0 %	0 %	98.5 %	99 %	44.6 %
African American	110	0	0	0	0	0	0	0	110
	96.5 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	29.9 %
Asian American	0	11	0	0	0	0	0	0	11
	0 %	91.7 %	0 %	0 %	0 %	0 %	0 %	0 %	3 %
Hispanic American	0	0	0	61	0	0	0	0	61
	0 %	0 %	0 %	100 %	0 %	0 %	0 %	0 %	16.6 %
Native American	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Bi-racial	0	0	7	0	0	0	0	0	7
	0 %	0 %	77.8 %	0 %	0 %	0 %	0 %	0 %	1.9 %
Multiple Minority Owners	0	0	0	0	5	0	0	0	5
	0 %	0 %	0 %	0 %	100 %	0 %	0 %	0 %	1.4 %
Publicly Traded Company	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Other Minority (specify):	4	1	2	0	0	1	1	1	10
	3.5 %	8.3 %	22.2 %	0 %	0 %	100 %	1.5 %	1 %	2.7 %
Total	114	12	9	61	5	1	65	101	368

PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table 8. What is your current single project bonding limit?

				Owners' Minority Status					
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	Total
\$100,000 or less	21	1	1	9	1	0	10	19	62
	18.4 %	8.3 %	11.1 %	14.8 %	20 %	0 %	15.4 %	18.8 %	16.8 %
\$100,001 - \$250,000	3	1	0	2	0	0	1	1	8
	2.6 %	8.3 %	0 %	3.3 %	0 %	0 %	1.5 %	1 %	2.2 %
\$250,001 - \$500,000	1	0	0	3	0	0	3	3	10
	0.9 %	0 %	0 %	4.9 %	0 %	0 %	4.6 %	3 %	2.7 %
\$500,001 - \$750,000	3	0	0	3	0	0	2	2	10
	2.6 %	0 %	0 %	4.9 %	0 %	0 %	3.1 %	2 %	2.7 %
\$750,001 - \$1,000,000	14	0	0	6	0	0	4	0	24
	12.3 %	0 %	0 %	9.8 %	0 %	0 %	6.2 %	0 %	6.5 %
\$1,000,001 - \$2,500,000	7	1	1	6	0	0	4	10	29
	6.1 %	8.3 %	11.1 %	9.8 %	0 %	0 %	6.2 %	9.9 %	7.9 %
\$2,500,001 - \$5,000,000	5	0	0	2	1	0	3	2	13
	4.4 %	0 %	0 %	3.3 %	20 %	0 %	4.6 %	2 %	3.5 %
\$5,000,001 to \$10,000,000	0	0	0	2	0	0	0	1	3
	0 %	0 %	0 %	3.3 %	0 %	0 %	0 %	1 %	0.8 %
Over \$10 million	1	0	0	1	0	0	1	0	3
	0.9 %	0 %	0 %	1.6 %	0 %	0 %	1.5 %	0 %	0.8 %
Don't Know/NA	59	9	7	27	3	1	37	63	206
	51.8 %	75 %	77.8 %	44.3 %	60 %	100 %	56.9 %	62.4 %	56 %
Total	114	12	9	61	5	1	65	101	368

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Table 9. What is the largest single contract your firm has been awarded during the Study Period (January 1, 2019, through December 31, 2023)?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
\$10,000 or less	22	1	2	10	1	0	8	19	63
	19.3 %	8.3 %	22.2 %	16.4 %	20 %	0 %	12.3 %	18.8 %	17.1 %
\$10,001 - \$99,999	17	3	1	13	1	0	9	19	63
	14.9 %	25 %	11.1 %	21.3 %	20 %	0 %	13.8 %	18.8 %	17.1 %
\$100,000 - \$499,999	17	2	0	6	0	0	9	9	43
	14.9 %	16.7 %	0 %	9.8 %	0 %	0 %	13.8 %	8.9 %	11.7 %
\$500,000 - \$999,999	5	0	1	5	0	0	2	4	17
	4.4 %	0 %	11.1 %	8.2 %	0 %	0 %	3.1 %	4 %	4.6 %
\$1,000,000 - \$1,999,999	6	1	3	4	0	0	7	5	26
	5.3 %	8.3 %	33.3 %	6.6 %	0 %	0 %	10.8 %	5 %	7.1 %
\$2,000,000 - \$2,499,999	2	0	0	1	0	0	1	0	4
	1.8 %	0 %	0 %	1.6 %	0 %	0 %	1.5 %	0 %	1.1 %
\$2,500,000 - \$4,999,999	3	0	0	3	0	0	2	3	11
	2.6 %	0 %	0 %	4.9 %	0 %	0 %	3.1 %	3 %	3 %
\$5,000,000 or more	1	0	0	1	0	0	3	1	6
	0.9 %	0 %	0 %	1.6 %	0 %	0 %	4.6 %	1 %	1.6 %
Don't Know/NA	41	5	2	18	3	1	24	41	135
	36 %	41.7 %	22.2 %	29.5 %	60 %	100 %	36.9 %	40.6 %	36.7 %
Total	114	12	9	61	5	1	65	101	368

Table 10. Have you provided any of the following services on any public or private contract since January 1, 2019?

Responses	Owners' Minority Status							Woman	Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White		
Prime Contractor and Subcontractor	23	4	1	16	1	0	13	22	80
	20.2 %	33.3 %	11.1 %	26.2 %	20 %	0 %	20 %	21.8 %	21.7 %
Prime Contractor	17	2	3	8	0	0	7	10	47
	14.9 %	16.7 %	33.3 %	13.1 %	0 %	0 %	10.8 %	9.9 %	12.8 %
Subcontractor	16	3	0	6	0	0	13	11	49
	14 %	25 %	0 %	9.8 %	0 %	0 %	20 %	10.9 %	13.3 %
Neither	58	3	5	31	4	1	32	58	192
	50.9 %	25 %	55.6 %	50.8 %	80 %	100 %	49.2 %	57.4 %	52.2 %
Total	114	12	9	61	5	1	65	101	368

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Table 11. On average, how many employees and regular independent contractors does your company keep on the payroll, including full-time and part-time staff? (Number of Employees)

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	13	4	3	4	0	0	14	13	51
	11.4 %	33.3 %	33.3 %	6.6 %	0 %	0 %	21.5 %	12.9 %	13.9 %
1-10	82	4	3	46	3	1	36	72	247
	71.9 %	33.3 %	33.3 %	75.4 %	60 %	100 %	55.4 %	71.3 %	67.1 %
11-30	8	2	3	8	1	0	11	11	44
	7 %	16.7 %	33.3 %	13.1 %	20 %	0 %	16.9 %	10.9 %	12 %
31-50	8	1	0	0	0	0	2	1	12
	7 %	8.3 %	0 %	0 %	0 %	0 %	3.1 %	1 %	3.3 %
51-75	1	0	0	0	1	0	0	1	3
	0.9 %	0 %	0 %	0 %	20 %	0 %	0 %	1 %	0.8 %
76-100	0	1	0	1	0	0	2	2	6
	0 %	8.3 %	0 %	1.6 %	0 %	0 %	3.1 %	2 %	1.6 %
101-300	2	0	0	2	0	0	0	1	5
	1.8 %	0 %	0 %	3.3 %	0 %	0 %	0 %	1 %	1.4 %
Over 300	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Total	114	12	9	61	5	1	65	101	368

Table 12. What is the highest level of education completed by the owner of your company?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Some High School	2	0	0	1	0	0	2	0	5
	1.8 %	0 %	0 %	1.6 %	0 %	0 %	3.1 %	0 %	1.4 %
High School Graduate	7	0	0	7	0	0	8	8	30
	6.1 %	0 %	0 %	11.5 %	0 %	0 %	12.3 %	7.9 %	8.2 %
Some College	14	4	0	12	2	1	16	15	64
	12.3 %	33.3 %	0 %	19.7 %	40 %	100 %	24.6 %	14.9 %	17.4 %
College Graduate	45	4	6	30	2	0	24	42	153
	39.5 %	33.3 %	66.7 %	49.2 %	40 %	0 %	36.9 %	41.6 %	41.6 %
Post Graduate Degree	40	4	2	11	1	0	10	28	96
	35.1 %	33.3 %	22.2 %	18 %	20 %	0 %	15.4 %	27.7 %	26.1 %
Trade or Technical Certificate	6	0	1	0	0	0	5	8	20
	5.3 %	0 %	11.1 %	0 %	0 %	0 %	7.7 %	7.9 %	5.4 %
Total	114	12	9	61	5	1	65	101	368

Table 13. How many years of experience in your company's line of business does the primary owner of your company have?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	0	1	0	0	0	0	1	0	2
	0 %	8.3 %	0 %	0 %	0 %	0 %	1.5 %	0 %	0.5 %
1-5	12	0	0	1	0	0	3	4	20
	10.5 %	0 %	0 %	1.6 %	0 %	0 %	4.6 %	4 %	5.4 %
6-10	18	1	2	7	0	0	2	6	36
	15.8 %	8.3 %	22.2 %	11.5 %	0 %	0 %	3.1 %	5.9 %	9.8 %
11-15	14	0	1	5	0	0	6	6	32
	12.3 %	0 %	11.1 %	8.2 %	0 %	0 %	9.2 %	5.9 %	8.7 %
16-20	14	0	2	13	1	1	3	7	41
	12.3 %	0 %	22.2 %	21.3 %	20 %	100 %	4.6 %	6.9 %	11.1 %
More than 20	56	10	4	35	4	0	50	78	237
	49.1 %	83.3 %	44.4 %	57.4 %	80 %	0 %	76.9 %	77.2 %	64.4 %
Total	114	12	9	61	5	1	65	101	368

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Table 14. Which of the following categories best approximates your company's gross revenues for calendar year 2023. Your best estimate will suffice.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
\$100,000 or less	43	2	4	12	1	0	12	19	93
	37.7 %	16.7 %	44.4 %	19.7 %	20 %	0 %	18.5 %	18.8 %	25.3 %
\$100,001 - \$250,000	21	5	3	11	0	1	8	22	71
	18.4 %	41.7 %	33.3 %	18 %	0 %	100 %	12.3 %	21.8 %	19.3 %
\$250,001 - \$500,000	16	2	0	10	1	0	6	20	55
	14 %	16.7 %	0 %	16.4 %	20 %	0 %	9.2 %	19.8 %	14.9 %
\$500,001 - \$750,000	4	0	0	6	0	0	1	9	20
	3.5 %	0 %	0 %	9.8 %	0 %	0 %	1.5 %	8.9 %	5.4 %
\$750,001 - \$1,000,000	5	0	0	7	1	0	8	5	26
	4.4 %	0 %	0 %	11.5 %	20 %	0 %	12.3 %	5 %	7.1 %
\$1,000,001 - \$1,320,000	4	1	0	0	0	0	5	4	14
	3.5 %	8.3 %	0 %	0 %	0 %	0 %	7.7 %	4 %	3.8 %
\$1,320,001 - \$1,500,000	4	0	0	4	0	0	0	4	12
	3.5 %	0 %	0 %	6.6 %	0 %	0 %	0 %	4 %	3.3 %
\$1,500,001 - \$4,000,000	5	0	0	8	2	0	13	4	32
	4.4 %	0 %	0 %	13.1 %	40 %	0 %	20 %	4 %	8.7 %
\$4,000,001 - \$5,000,000	1	0	0	1	0	0	1	3	6
	0.9 %	0 %	0 %	1.6 %	0 %	0 %	1.5 %	3 %	1.6 %
\$5,000,001 - \$9,000,000	1	1	0	0	0	0	2	2	6
	0.9 %	8.3 %	0 %	0 %	0 %	0 %	3.1 %	2 %	1.6 %
\$9,000,001 - \$15,000,000	0	1	0	1	0	0	2	2	6
	0 %	8.3 %	0 %	1.6 %	0 %	0 %	3.1 %	2 %	1.6 %
\$15,000,001 - \$20,000,000	0	0	0	0	0	0	1	0	1
	0 %	0 %	0 %	0 %	0 %	0 %	1.5 %	0 %	0.3 %
\$20,000,001 - \$45,000,000	0	0	0	0	0	0	1	1	2
	0 %	0 %	0 %	0 %	0 %	0 %	1.5 %	1 %	0.5 %
Over \$45,000,000	0	0	1	0	0	0	1	1	3
	0 %	0 %	11.1 %	0 %	0 %	0 %	1.5 %	1 %	0.8 %
Don't Know/NA	10	0	1	1	0	0	4	5	21
	8.8 %	0 %	11.1 %	1.6 %	0 %	0 %	6.2 %	5 %	5.7 %
Total	114	12	9	61	5	1	65	101	368

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Table 15. Is your company registered to do business with Palm Beach County?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	108	12	8	55	3	1	60	83	330
	94.7 %	100 %	88.9 %	90.2 %	60 %	100 %	92.3 %	82.2 %	89.7 %
No	6	0	1	6	2	0	5	18	38
	5.3 %	0 %	11.1 %	9.8 %	40 %	0 %	7.7 %	17.8 %	10.3 %
Total	114	12	9	61	5	1	65	101	368

Table 16. If you answered "No" above, why is your company not registered to do business with Palm Beach County? Indicate all that apply: Do not know how to register.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	2	0	1	4	1	0	3	16	27
	33.3 %	0 %	100 %	66.7 %	50 %	0 %	60 %	88.9 %	71.1 %
Selected	4	0	0	2	1	0	2	2	11
	66.7 %	0 %	0 %	33.3 %	50 %	0 %	40 %	11.1 %	28.9 %
Total	6	0	1	6	2	0	5	18	38

Table 17. Did not know there was a registry.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	5	0	1	5	1	0	1	10	23
	83.3 %	0 %	100 %	83.3 %	50 %	0 %	20 %	55.6 %	60.5 %
Selected	1	0	0	1	1	0	4	8	15
	16.7 %	0 %	0 %	16.7 %	50 %	0 %	80 %	44.4 %	39.5 %
Total	6	0	1	6	2	0	5	18	38

Table 18. Do not see any benefit in registering.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	6	0	1	6	2	0	4	16	35
	100 %	0 %	100 %	100 %	100 %	0 %	80 %	88.9 %	92.1 %
Selected	0	0	0	0	0	0	1	2	3
	0 %	0 %	0 %	0 %	0 %	0 %	20 %	11.1 %	7.9 %
Total	6	0	1	6	2	0	5	18	38

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Table 19. Do not want to do business with government.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	6	0	1	6	2	0	5	17	37
	100 %	0 %	100 %	100 %	100 %	0 %	100 %	94.4 %	97.4 %
Selected	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	5.6 %	2.6 %
Total	6	0	1	6	2	0	5	18	38

Table 20. Do not want to do business with Palm Beach County.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	6	0	1	6	2	0	5	16	36
	100 %	0 %	100 %	100 %	100 %	0 %	100 %	88.9 %	94.7 %
Selected	0	0	0	0	0	0	0	2	2
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	11.1 %	5.3 %
Total	6	0	1	6	2	0	5	18	38

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Table 21. Do not see opportunities in my field of work.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	5	0	1	5	2	0	3	14	30
	83.3 %	0 %	100 %	83.3 %	100 %	0 %	60 %	77.8 %	78.9 %
Selected	1	0	0	1	0	0	2	4	8
	16.7 %	0 %	0 %	16.7 %	0 %	0 %	40 %	22.2 %	21.1 %
Total	6	0	1	6	2	0	5	18	38

Table 22. Do not believe firm would be awarded contract.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	5	0	1	6	2	0	3	17	34
	83.3 %	0 %	100 %	100 %	100 %	0 %	60 %	94.4 %	89.5 %
Selected	1	0	0	0	0	0	2	1	4
	16.7 %	0 %	0 %	0 %	0 %	0 %	40 %	5.6 %	10.5 %
Total	6	0	1	6	2	0	5	18	38

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Table 23. Have not gotten around to it.

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Not Selected	6	0	0	5	1	0	5	15	32
	100 %	0 %	0 %	83.3 %	50 %	0 %	100 %	83.3 %	84.2 %
Selected	0	0	1	1	1	0	0	3	6
	0 %	0 %	100 %	16.7 %	50 %	0 %	0 %	16.7 %	15.8 %
<i>Total</i>	6	0	1	6	2	0	5	18	38

Table 24. Other (fill in blank):

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Not Selected	4	0	1	5	2	0	5	15	32
	66.7 %	0 %	100 %	83.3 %	100 %	0 %	100 %	83.3 %	84.2 %
Selected	2	0	0	1	0	0	0	3	6
	33.3 %	0 %	0 %	16.7 %	0 %	0 %	0 %	16.7 %	15.8 %
<i>Total</i>	6	0	1	6	2	0	5	18	38

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Table 25. For participants who responded 'Other' to the question above and provided an explanation why, responses fell in the following categories.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Did not find it necessary	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Do not see opportunities in my field of work.	0	0	0	0	0	0	0	2	2
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	66.7 %	33.3 %
Do not want to do business with Palm Beach County.	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
I meant to register but have not gotten around to it yet.	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Does not know	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Other	2	0	0	1	0	0	0	0	3
	100 %	0 %	0 %	100 %	0 %	0 %	0 %	0 %	50 %
Not applicable	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Registered in Broward	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Not worth the cost	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	33.3 %	16.7 %
Not aware business was eligible	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Total	2	0	0	1	0	0	0	3	6

Table 26. Is your company registered to do business with any other government entity including but not limited to: State of Florida, Florida Department of Transportation (FDOT), City of West Palm Beach, School District of Palm Beach, Solid Waste Authority, Broward

Responses	Owners' Minority Status							Woman	Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White		
Yes	76	11	4	36	3	0	28	52	210
	66.7 %	91.7 %	44.4 %	59 %	60 %	0 %	43.1 %	51.5 %	57.1 %
No	38	1	5	25	2	1	37	49	158
	33.3 %	8.3 %	55.6 %	41 %	40 %	100 %	56.9 %	48.5 %	42.9 %
Total	114	12	9	61	5	1	65	101	368

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Table 27. From January 1, 2019, through December 31, 2023, how many times has your company submitted bids, proposals, or other solicitations for projects as a prime contractor/vendor on: Palm Beach County Public Projects

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	68	6	4	35	2	1	38	64	218
	59.6 %	50 %	44.4 %	57.4 %	40 %	100 %	58.5 %	63.4 %	59.2 %
1-10	36	4	4	16	1	0	13	20	94
	31.6 %	33.3 %	44.4 %	26.2 %	20 %	0 %	20 %	19.8 %	25.5 %
11-25	2	1	0	2	0	0	0	2	7
	1.8 %	8.3 %	0 %	3.3 %	0 %	0 %	0 %	2 %	1.9 %
26-50	2	0	0	1	0	0	2	1	6
	1.8 %	0 %	0 %	1.6 %	0 %	0 %	3.1 %	1 %	1.6 %
51-100	0	0	0	0	0	0	1	1	2
	0 %	0 %	0 %	0 %	0 %	0 %	1.5 %	1 %	0.5 %
Over 100	1	0	0	1	0	0	2	2	6
	0.9 %	0 %	0 %	1.6 %	0 %	0 %	3.1 %	2 %	1.6 %
Do Not Know/NA	5	1	1	6	2	0	9	11	35
	4.4 %	8.3 %	11.1 %	9.8 %	40 %	0 %	13.8 %	10.9 %	9.5 %
Total	114	12	9	61	5	1	65	101	368

Table 28. Private Sector Projects

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	56	5	5	25	1	0	30	57	179
	49.1 %	41.7 %	55.6 %	41 %	20 %	0 %	46.2 %	56.4 %	48.6 %
1-10	40	2	0	13	1	1	7	12	76
	35.1 %	16.7 %	0 %	21.3 %	20 %	100 %	10.8 %	11.9 %	20.7 %
11-25	5	1	0	7	0	0	3	5	21
	4.4 %	8.3 %	0 %	11.5 %	0 %	0 %	4.6 %	5 %	5.7 %
26-50	3	0	1	4	0	0	4	3	15
	2.6 %	0 %	11.1 %	6.6 %	0 %	0 %	6.2 %	3 %	4.1 %
51-100	1	0	1	3	2	0	2	1	10
	0.9 %	0 %	11.1 %	4.9 %	40 %	0 %	3.1 %	1 %	2.7 %
Over 100	3	1	1	3	0	0	8	9	25
	2.6 %	8.3 %	11.1 %	4.9 %	0 %	0 %	12.3 %	8.9 %	6.8 %
Do Not Know/NA	6	3	1	6	1	0	11	14	42
	5.3 %	25 %	11.1 %	9.8 %	20 %	0 %	16.9 %	13.9 %	11.4 %
Total	114	12	9	61	5	1	65	101	368

Table 29. Other Public Sector (non-Palm Beach County Projects)

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	69	5	5	37	2	1	32	56	207
	60.5 %	41.7 %	55.6 %	60.7 %	40 %	100 %	49.2 %	55.4 %	56.2 %
1-10	31	4	1	9	1	0	9	16	71
	27.2 %	33.3 %	11.1 %	14.8 %	20 %	0 %	13.8 %	15.8 %	19.3 %
11-25	3	1	0	4	0	0	4	5	17
	2.6 %	8.3 %	0 %	6.6 %	0 %	0 %	6.2 %	5 %	4.6 %
26-50	4	1	0	2	0	0	2	2	11
	3.5 %	8.3 %	0 %	3.3 %	0 %	0 %	3.1 %	2 %	3 %
51-100	1	0	0	1	0	0	0	5	7
	0.9 %	0 %	0 %	1.6 %	0 %	0 %	0 %	5 %	1.9 %
Over 100	1	0	0	1	0	0	5	3	10
	0.9 %	0 %	0 %	1.6 %	0 %	0 %	7.7 %	3 %	2.7 %
Do Not Know/NA	5	1	3	7	2	0	13	14	45
	4.4 %	8.3 %	33.3 %	11.5 %	40 %	0 %	20 %	13.9 %	12.2 %
Total	114	12	9	61	5	1	65	101	368

Table 30. Have you ever had to bid more with Palm Beach County because you had to satisfy a S/M/WBE goal?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	5	1	1	3	0	0	0	4	14
	12.2 %	20 %	25 %	15 %	0 %	0 %	0 %	15.4 %	12.2 %
No	36	4	3	17	1	0	18	22	101
	87.8 %	80 %	75 %	85 %	100 %	0 %	100 %	84.6 %	87.8 %
Total	41	5	4	20	1	0	18	26	115

Table 31. Can you estimate how much more?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
1-5%	1	0	0	1	0	0	0	2	4
	20 %	0 %	0 %	33.3 %	0 %	0 %	0 %	50 %	28.6 %
6-10%	1	0	0	0	0	0	0	1	2
	20 %	0 %	0 %	0 %	0 %	0 %	0 %	25 %	14.3 %
11-15%	1	1	0	2	0	0	0	0	4
	20 %	100 %	0 %	66.7 %	0 %	0 %	0 %	0 %	28.6 %
16-20%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
21-25%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
More than 25%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Don't Know/NA	2	0	1	0	0	0	0	1	4
	40 %	0 %	100 %	0 %	0 %	0 %	0 %	25 %	28.6 %
Total	5	1	1	3	0	0	0	4	14

Table 32. Did you win any of the awards where that applied?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	1	1	1	0	0	0	0	2	5
	20 %	100 %	100 %	0 %	0 %	0 %	0 %	50 %	35.7 %
No	4	0	0	3	0	0	0	2	9
	80 %	0 %	0 %	100 %	0 %	0 %	0 %	50 %	64.3 %
Total	5	1	1	3	0	0	0	4	14

Table 33. Would you be willing to provide documentation to G&S as evidence of this?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	4	1	1	1	0	0	0	0	7
	80 %	100 %	100 %	33.3 %	0 %	0 %	0 %	0 %	50 %
No	1	0	0	2	0	0	0	4	7
	20 %	0 %	0 %	66.7 %	0 %	0 %	0 %	100 %	50 %
Total	5	1	1	3	0	0	0	4	14

Table 34. Have you ever had to take higher bids from S/M/WBE subcontractors for a project with Palm Beach County because you had to satisfy an S/M/WBE goal?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	0	2	0	1	0	0	0	2	5
	0 %	40 %	0 %	5 %	0 %	0 %	0 %	7.7 %	4.3 %
No	41	3	4	19	1	0	18	24	110
	100 %	60 %	100 %	95 %	100 %	0 %	100 %	92.3 %	95.7 %
Total	41	5	4	20	1	0	18	26	115

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Table 35. Can you estimate how much more?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
1-5%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
6-10%	0	1	0	0	0	0	0	1	2
	0 %	50 %	0 %	0 %	0 %	0 %	0 %	50 %	40 %
11-15%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
16-20%	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	50 %	20 %
21-25%	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	100 %	0 %	0 %	0 %	0 %	20 %
More than 25%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Don't Know/NA	0	1	0	0	0	0	0	0	1
	0 %	50 %	0 %	0 %	0 %	0 %	0 %	0 %	20 %
Total	0	2	0	1	0	0	0	2	5

Table 36. Did you win any of the awards where that applied?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	0	2	0	0	0	0	0	1	3
	0 %	100 %	0 %	0 %	0 %	0 %	0 %	50 %	60 %
No	0	0	0	1	0	0	0	1	2
	0 %	0 %	0 %	100 %	0 %	0 %	0 %	50 %	40 %
Total	0	2	0	1	0	0	0	2	5

Table 37. Would you be willing to provide documentation to G&S as evidence of this?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	0	1	0	0	0	0	0	0	1
	0 %	50 %	0 %	0 %	0 %	0 %	0 %	0 %	20 %
No	0	1	0	1	0	0	0	2	4
	0 %	50 %	0 %	100 %	0 %	0 %	0 %	100 %	80 %
Total	0	2	0	1	0	0	0	2	5

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Table 38. From January 1, 2019, through December 31, 2023, how many times has your company been awarded contracts to perform as a prime contractor: Palm Beach County Public Projects

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	90	10	5	45	2	1	44	78	275
	78.9 %	83.3 %	55.6 %	73.8 %	40 %	100 %	67.7 %	77.2 %	74.7 %
1-10	17	2	2	10	0	0	8	9	48
	14.9 %	16.7 %	22.2 %	16.4 %	0 %	0 %	12.3 %	8.9 %	13 %
11-25	1	0	0	0	0	0	1	2	4
	0.9 %	0 %	0 %	0 %	0 %	0 %	1.5 %	2 %	1.1 %
26-50	0	0	0	0	0	0	0	2	2
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	2 %	0.5 %
51-100	0	0	0	0	0	0	1	0	1
	0 %	0 %	0 %	0 %	0 %	0 %	1.5 %	0 %	0.3 %
Over 100	0	0	0	1	0	0	1	1	3
	0 %	0 %	0 %	1.6 %	0 %	0 %	1.5 %	1 %	0.8 %
Do Not Know/NA	6	0	2	5	3	0	10	9	35
	5.3 %	0 %	22.2 %	8.2 %	60 %	0 %	15.4 %	8.9 %	9.5 %
Total	114	12	9	61	5	1	65	101	368

Table 39. Private Sector Projects

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	73	9	4	31	2	0	32	64	215
	64 %	75 %	44.4 %	50.8 %	40 %	0 %	49.2 %	63.4 %	58.4 %
1-10	28	1	0	16	0	1	5	12	63
	24.6 %	8.3 %	0 %	26.2 %	0 %	100 %	7.7 %	11.9 %	17.1 %
11-25	3	0	1	1	0	0	3	4	12
	2.6 %	0 %	11.1 %	1.6 %	0 %	0 %	4.6 %	4 %	3.3 %
26-50	1	1	1	3	2	0	2	2	12
	0.9 %	8.3 %	11.1 %	4.9 %	40 %	0 %	3.1 %	2 %	3.3 %
51-100	0	0	0	3	0	0	3	1	7
	0 %	0 %	0 %	4.9 %	0 %	0 %	4.6 %	1 %	1.9 %
Over 100	1	0	1	2	0	0	5	8	17
	0.9 %	0 %	11.1 %	3.3 %	0 %	0 %	7.7 %	7.9 %	4.6 %
Do Not Know/NA	8	1	2	5	1	0	15	10	42
	7 %	8.3 %	22.2 %	8.2 %	20 %	0 %	23.1 %	9.9 %	11.4 %
Total	114	12	9	61	5	1	65	101	368

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Table 40. Other Public Sector (non-Palm Beach County Projects)

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	82	9	5	39	1	1	35	66	238
	71.9 %	75 %	55.6 %	63.9 %	20 %	100 %	53.8 %	65.3 %	64.7 %
1-10	21	1	1	11	1	0	6	14	55
	18.4 %	8.3 %	11.1 %	18 %	20 %	0 %	9.2 %	13.9 %	14.9 %
11-25	4	0	0	3	0	0	2	3	12
	3.5 %	0 %	0 %	4.9 %	0 %	0 %	3.1 %	3 %	3.3 %
26-50	0	2	0	1	0	0	1	4	8
	0 %	16.7 %	0 %	1.6 %	0 %	0 %	1.5 %	4 %	2.2 %
51-100	0	0	0	1	0	0	2	2	5
	0 %	0 %	0 %	1.6 %	0 %	0 %	3.1 %	2 %	1.4 %
Over 100	0	0	0	0	0	0	3	3	6
	0 %	0 %	0 %	0 %	0 %	0 %	4.6 %	3 %	1.6 %
Do Not Know/NA	7	0	3	6	3	0	16	9	44
	6.1 %	0 %	33.3 %	9.8 %	60 %	0 %	24.6 %	8.9 %	12 %
Total	114	12	9	61	5	1	65	101	368

Table 41. What is the amount of time that it typically takes to receive payment from Palm Beach County from the time you submit your invoice for your services on Palm Beach County projects?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
1-30 days	12	0	2	5	0	0	4	4	27
	66.7 %	0 %	100 %	45.5 %	0 %	0 %	36.4 %	28.6 %	46.6 %
31-60 days	3	1	0	2	0	0	3	5	14
	16.7 %	50 %	0 %	18.2 %	0 %	0 %	27.3 %	35.7 %	24.1 %
61-90 days	1	0	0	1	0	0	2	2	6
	5.6 %	0 %	0 %	9.1 %	0 %	0 %	18.2 %	14.3 %	10.3 %
91-120 days	0	0	0	0	0	0	1	2	3
	0 %	0 %	0 %	0 %	0 %	0 %	9.1 %	14.3 %	5.2 %
Over 120 days	0	0	0	0	0	0	1	1	2
	0 %	0 %	0 %	0 %	0 %	0 %	9.1 %	7.1 %	3.4 %
Don't Know/NA	2	1	0	3	0	0	0	0	6
	11.1 %	50 %	0 %	27.3 %	0 %	0 %	0 %	0 %	10.3 %
Total	18	2	2	11	0	0	11	14	58

Table 42. Approximately how many times did you serve as a subcontractor on a Palm Beach County project from January 1, 2019, through December 31, 2023?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	89	9	8	44	4	1	44	71	270
	78.1 %	75 %	88.9 %	72.1 %	80 %	100 %	67.7 %	70.3 %	73.4 %
1-10	17	1	0	10	0	0	10	13	51
	14.9 %	8.3 %	0 %	16.4 %	0 %	0 %	15.4 %	12.9 %	13.9 %
11-25	1	1	0	0	0	0	1	3	6
	0.9 %	8.3 %	0 %	0 %	0 %	0 %	1.5 %	3 %	1.6 %
26-50	0	0	0	2	1	0	0	1	4
	0 %	0 %	0 %	3.3 %	20 %	0 %	0 %	1 %	1.1 %
51-100	0	0	0	1	0	0	2	1	4
	0 %	0 %	0 %	1.6 %	0 %	0 %	3.1 %	1 %	1.1 %
Over 100	0	1	0	0	0	0	1	0	2
	0 %	8.3 %	0 %	0 %	0 %	0 %	1.5 %	0 %	0.5 %
Don't Know/NA	7	0	1	4	0	0	7	12	31
	6.1 %	0 %	11.1 %	6.6 %	0 %	0 %	10.8 %	11.9 %	8.4 %
Total	114	12	9	61	5	1	65	101	368

Table 43. What is the amount of time that it takes to receive payment from prime contractors/vendors from the time you submit your invoice for your services on Palm Beach County projects?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
15 days or less	2	0	0	1	0	0	1	2	6
	11.1 %	0 %	0 %	7.7 %	0 %	0 %	7.1 %	11.1 %	9 %
16-30 days	2	0	0	3	0	0	1	2	8
	11.1 %	0 %	0 %	23.1 %	0 %	0 %	7.1 %	11.1 %	11.9 %
31-60 days	6	0	0	4	1	0	3	6	20
	33.3 %	0 %	0 %	30.8 %	100 %	0 %	21.4 %	33.3 %	29.9 %
61-90 days	4	0	0	2	0	0	4	3	13
	22.2 %	0 %	0 %	15.4 %	0 %	0 %	28.6 %	16.7 %	19.4 %
91-120 days	1	1	0	0	0	0	2	1	5
	5.6 %	33.3 %	0 %	0 %	0 %	0 %	14.3 %	5.6 %	7.5 %
Over 120 days	2	0	0	0	0	0	2	1	5
	11.1 %	0 %	0 %	0 %	0 %	0 %	14.3 %	5.6 %	7.5 %
Don't Know/NA	1	2	0	3	0	0	1	3	10
	5.6 %	66.7 %	0 %	23.1 %	0 %	0 %	7.1 %	16.7 %	14.9 %
Total	18	3	0	13	1	0	14	18	67

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Table 44. In your experience, have any of the following been a barrier to your firm obtaining work on projects for Palm Beach County?: Pre-qualification requirements

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	89	9	6	49	4	1	61	92	311
	78.1 %	75 %	66.7 %	80.3 %	80 %	100 %	93.8 %	91.1 %	84.5 %
Selected	25	3	3	12	1	0	4	9	57
	21.9 %	25 %	33.3 %	19.7 %	20 %	0 %	6.2 %	8.9 %	15.5 %
Total	114	12	9	61	5	1	65	101	368

Table 45. Performance bond requirements

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	99	11	8	54	4	1	60	97	334
	86.8 %	91.7 %	88.9 %	88.5 %	80 %	100 %	92.3 %	96 %	90.8 %
Selected	15	1	1	7	1	0	5	4	34
	13.2 %	8.3 %	11.1 %	11.5 %	20 %	0 %	7.7 %	4 %	9.2 %
Total	114	12	9	61	5	1	65	101	368

Table 46. Excessive paperwork

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	91	11	6	47	2	1	54	85	297
	79.8 %	91.7 %	66.7 %	77 %	40 %	100 %	83.1 %	84.2 %	80.7 %
Selected	23	1	3	14	3	0	11	16	71
	20.2 %	8.3 %	33.3 %	23 %	60 %	0 %	16.9 %	15.8 %	19.3 %
Total	114	12	9	61	5	1	65	101	368

Table 47. Bid bond requirements

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	99	11	8	51	4	1	58	96	328
	86.8 %	91.7 %	88.9 %	83.6 %	80 %	100 %	89.2 %	95 %	89.1 %
Selected	15	1	1	10	1	0	7	5	40
	13.2 %	8.3 %	11.1 %	16.4 %	20 %	0 %	10.8 %	5 %	10.9 %
Total	114	12	9	61	5	1	65	101	368

Table 48. Financing

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	85	12	7	54	5	1	60	95	319
	74.6 %	100 %	77.8 %	88.5 %	100 %	100 %	92.3 %	94.1 %	86.7 %
Selected	29	0	2	7	0	0	5	6	49
	25.4 %	0 %	22.2 %	11.5 %	0 %	0 %	7.7 %	5.9 %	13.3 %
Total	114	12	9	61	5	1	65	101	368

Table 49. Insurance requirements

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	98	11	7	55	5	1	63	93	333
	86 %	91.7 %	77.8 %	90.2 %	100 %	100 %	96.9 %	92.1 %	90.5 %
Selected	16	1	2	6	0	0	2	8	35
	14 %	8.3 %	22.2 %	9.8 %	0 %	0 %	3.1 %	7.9 %	9.5 %
Total	114	12	9	61	5	1	65	101	368

Table 50. Bid specifications

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	95	12	5	53	5	1	60	93	324
	83.3 %	100 %	55.6 %	86.9 %	100 %	100 %	92.3 %	92.1 %	88 %
Selected	19	0	4	8	0	0	5	8	44
	16.7 %	0 %	44.4 %	13.1 %	0 %	0 %	7.7 %	7.9 %	12 %
Total	114	12	9	61	5	1	65	101	368

Table 51. Lack of access to competitive supplier pricing

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	97	10	8	52	5	1	63	96	332
	85.1 %	83.3 %	88.9 %	85.2 %	100 %	100 %	96.9 %	95 %	90.2 %
Selected	17	2	1	9	0	0	2	5	36
	14.9 %	16.7 %	11.1 %	14.8 %	0 %	0 %	3.1 %	5 %	9.8 %
Total	114	12	9	61	5	1	65	101	368

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Table 52. Limited time given to prepare bid package or quote

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	98	11	7	57	5	1	62	97	338
	86 %	91.7 %	77.8 %	93.4 %	100 %	100 %	95.4 %	96 %	91.8 %
Selected	16	1	2	4	0	0	3	4	30
	14 %	8.3 %	22.2 %	6.6 %	0 %	0 %	4.6 %	4 %	8.2 %
Total	114	12	9	61	5	1	65	101	368

Table 53. Limited knowledge of purchasing/contracting policies and procedures

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	89	12	7	52	4	0	63	92	319
	78.1 %	100 %	77.8 %	85.2 %	80 %	0 %	96.9 %	91.1 %	86.7 %
Selected	25	0	2	9	1	1	2	9	49
	21.9 %	0 %	22.2 %	14.8 %	20 %	100 %	3.1 %	8.9 %	13.3 %
Total	114	12	9	61	5	1	65	101	368

Table 54. Language Barriers

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Not Selected	112	12	9	58	5	1	65	101	363
	98.2 %	100 %	100 %	95.1 %	100 %	100 %	100 %	100 %	98.6 %
Selected	2	0	0	3	0	0	0	0	5
	1.8 %	0 %	0 %	4.9 %	0 %	0 %	0 %	0 %	1.4 %
Total	114	12	9	61	5	1	65	101	368

Table 55. Lack of experience

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Not Selected	100	11	6	59	4	1	61	97	339
	87.7 %	91.7 %	66.7 %	96.7 %	80 %	100 %	93.8 %	96 %	92.1 %
Selected	14	1	3	2	1	0	4	4	29
	12.3 %	8.3 %	33.3 %	3.3 %	20 %	0 %	6.2 %	4 %	7.9 %
Total	114	12	9	61	5	1	65	101	368

Table 56. Lack of personnel

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	102	12	9	61	5	1	61	99	350
	89.5 %	100 %	100 %	100 %	100 %	100 %	93.8 %	98 %	95.1 %
Selected	12	0	0	0	0	0	4	2	18
	10.5 %	0 %	0 %	0 %	0 %	0 %	6.2 %	2 %	4.9 %
Total	114	12	9	61	5	1	65	101	368

Table 57. Contract too large

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	93	11	9	58	5	1	62	97	336
	81.6 %	91.7 %	100 %	95.1 %	100 %	100 %	95.4 %	96 %	91.3 %
Selected	21	1	0	3	0	0	3	4	32
	18.4 %	8.3 %	0 %	4.9 %	0 %	0 %	4.6 %	4 %	8.7 %
Total	114	12	9	61	5	1	65	101	368

Table 58. Contract too expensive to bid

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	98	12	7	56	5	1	64	97	340
	86 %	100 %	77.8 %	91.8 %	100 %	100 %	98.5 %	96 %	92.4 %
Selected	16	0	2	5	0	0	1	4	28
	14 %	0 %	22.2 %	8.2 %	0 %	0 %	1.5 %	4 %	7.6 %
Total	114	12	9	61	5	1	65	101	368

Table 59. Unfair Selection process

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	99	11	9	53	5	1	60	94	332
	86.8 %	91.7 %	100 %	86.9 %	100 %	100 %	92.3 %	93.1 %	90.2 %
Selected	15	1	0	8	0	0	5	7	36
	13.2 %	8.3 %	0 %	13.1 %	0 %	0 %	7.7 %	6.9 %	9.8 %
Total	114	12	9	61	5	1	65	101	368

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Table 60. Not certified

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	Total
Not Selected	98	12	8	55	4	1	62	95	335
	86 %	100 %	88.9 %	90.2 %	80 %	100 %	95.4 %	94.1 %	91 %
Selected	16	0	1	6	1	0	3	6	33
	14 %	0 %	11.1 %	9.8 %	20 %	0 %	4.6 %	5.9 %	9 %
Total	114	12	9	61	5	1	65	101	368

Table 61. Unfair competition with large firms.

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	Total
Not Selected	82	11	6	43	4	1	59	89	295
	71.9 %	91.7 %	66.7 %	70.5 %	80 %	100 %	90.8 %	88.1 %	80.2 %
Selected	32	1	3	18	1	0	6	12	73
	28.1 %	8.3 %	33.3 %	29.5 %	20 %	0 %	9.2 %	11.9 %	19.8 %
Total	114	12	9	61	5	1	65	101	368

Table 62. Other (fill in blank):

Responses	Owners' Minority Status								<i>Total</i>
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	100	7	8	52	5	1	56	77	306
	87.7 %	58.3 %	88.9 %	85.2 %	100 %	100 %	86.2 %	76.2 %	83.2 %
Selected	14	5	1	9	0	0	9	24	62
	12.3 %	41.7 %	11.1 %	14.8 %	0 %	0 %	13.8 %	23.8 %	16.8 %
Total	114	12	9	61	5	1	65	101	368

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Table 63. For participants who responded 'Other' to the question above and provided an explanation why, responses fell in the following categories.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Bid specifications	0	0	1	0	0	0	2	1	4
	0 %	0 %	100 %	0 %	0 %	0 %	22.2 %	4.3 %	6.8 %
Does not know	0	0	0	1	0	0	0	2	3
	0 %	0 %	0 %	11.1 %	0 %	0 %	0 %	8.7 %	5.1 %
Informal networks/Same firms get contracts	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	11.1 %	0 %	0 %	0 %	0 %	1.7 %
Lack of knowledge of available opportunities	2	1	0	0	0	0	0	3	6
	15.4 %	25 %	0 %	0 %	0 %	0 %	0 %	13 %	10.2 %
Lack of personnel	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Limited knowledge of purchasing/contracting policies and procedures	1	0	0	0	0	0	0	0	1
	7.7 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	1.7 %
Same firms get the contracts over and over	0	1	0	0	0	0	1	0	2
	0 %	25 %	0 %	0 %	0 %	0 %	11.1 %	0 %	3.4 %
Selection process	0	0	0	0	0	0	1	1	2
	0 %	0 %	0 %	0 %	0 %	0 %	11.1 %	4.3 %	3.4 %
Unfair competition with large firms	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	4.3 %	1.7 %
No Barriers	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %

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Table 63. For participants who responded 'Other' to the question above and provided an explanation why, responses fell in the following categories.

Responses	Owners' Minority Status							Woman	Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White		
Projects are too large	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	4.3 %	1.7 %
No work given after award	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	4.3 %	1.7 %
Other	3	0	0	2	0	0	2	2	9
	23.1 %	0 %	0 %	22.2 %	0 %	0 %	22.2 %	8.7 %	15.3 %
Not applicable	0	0	0	1	0	0	3	4	8
	0 %	0 %	0 %	11.1 %	0 %	0 %	33.3 %	17.4 %	13.6 %
Product/service not typically used by county	3	0	0	2	0	0	0	2	7
	23.1 %	0 %	0 %	22.2 %	0 %	0 %	0 %	8.7 %	11.9 %
Lack of communication from county	0	0	0	0	0	0	0	2	2
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	8.7 %	3.4 %
Have never bid	3	1	0	2	0	0	0	1	7
	23.1 %	25 %	0 %	22.2 %	0 %	0 %	0 %	4.3 %	11.9 %
Certification Criteria	0	1	0	0	0	0	0	1	2
	0 %	25 %	0 %	0 %	0 %	0 %	0 %	4.3 %	3.4 %
Not registered	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	4.3 %	1.7 %
Not enough time to bid	1	0	0	0	0	0	0	0	1
	7.7 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	1.7 %
Total	13	4	1	9	0	0	9	23	59

Table 64. No Barriers

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Not Selected	89	8	6	43	3	1	34	66	250
	78.1 %	66.7 %	66.7 %	70.5 %	60 %	100 %	52.3 %	65.3 %	67.9 %
Selected	25	4	3	18	2	0	31	35	118
	21.9 %	33.3 %	33.3 %	29.5 %	40 %	0 %	47.7 %	34.7 %	32.1 %
Total	114	12	9	61	5	1	65	101	368

Table 65. Is your company a certified Small, Minority or Woman-owned Business Enterprise? (collectively "S/M/WBE")

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Yes	80	7	5	28	2	1	16	49	188
	70.2 %	58.3 %	55.6 %	45.9 %	40 %	100 %	24.6 %	48.5 %	51.1 %
No	34	5	4	33	3	0	49	52	180
	29.8 %	41.7 %	44.4 %	54.1 %	60 %	0 %	75.4 %	51.5 %	48.9 %
Total	114	12	9	61	5	1	65	101	368

Table 66. SBE (Small-owned Business Enterprise)

Responses	Owners' Minority Status							Woman	Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White		
Yes	74	6	4	23	2	1	14	40	164
	92.5 %	85.7 %	80 %	82.1 %	100 %	100 %	87.5 %	81.6 %	87.2 %
No	3	0	1	2	0	0	0	5	11
	3.8 %	0 %	20 %	7.1 %	0 %	0 %	0 %	10.2 %	5.9 %
N/A	3	1	0	3	0	0	2	4	13
	3.8 %	14.3 %	0 %	10.7 %	0 %	0 %	12.5 %	8.2 %	6.9 %
Total	80	7	5	28	2	1	16	49	188

Table 67. MBE (Minority-owned Business Enterprise)

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	75	6	3	23	2	1	1	10	121
	93.8 %	85.7 %	60 %	82.1 %	100 %	100 %	6.2 %	20.4 %	64.4 %
No	3	0	2	1	0	0	9	32	47
	3.8 %	0 %	40 %	3.6 %	0 %	0 %	56.2 %	65.3 %	25 %
N/A	2	1	0	4	0	0	6	7	20
	2.5 %	14.3 %	0 %	14.3 %	0 %	0 %	37.5 %	14.3 %	10.6 %
Total	80	7	5	28	2	1	16	49	188

Table 68. WBE (Women-owned Business Enterprise)

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	40	3	3	6	1	0	0	43	96
	50 %	42.9 %	60 %	21.4 %	50 %	0 %	0 %	87.8 %	51.1 %
No	27	2	1	13	1	1	10	3	58
	33.8 %	28.6 %	20 %	46.4 %	50 %	100 %	62.5 %	6.1 %	30.9 %
N/A	13	2	1	9	0	0	6	3	34
	16.2 %	28.6 %	20 %	32.1 %	0 %	0 %	37.5 %	6.1 %	18.1 %
Total	80	7	5	28	2	1	16	49	188

Table 69. Why is your company not certified as an S/M/WBE?: I do not understand the certification process.

Responses	Owners' Minority Status							Woman	Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White		
Not Selected	18	4	3	14	0	0	39	36	114
	52.9 %	80 %	75 %	42.4 %	0 %	0 %	79.6 %	69.2 %	63.3 %
Selected	16	1	1	19	3	0	10	16	66
	47.1 %	20 %	25 %	57.6 %	100 %	0 %	20.4 %	30.8 %	36.7 %
Total	34	5	4	33	3	0	49	52	180

Table 70. We do not meet one or more of the requirements for certification.

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Not Selected	32	4	4	31	3	0	35	51	160
	94.1 %	80 %	100 %	93.9 %	100 %	0 %	71.4 %	98.1 %	88.9 %
Selected	2	1	0	2	0	0	14	1	20
	5.9 %	20 %	0 %	6.1 %	0 %	0 %	28.6 %	1.9 %	11.1 %
Total	34	5	4	33	3	0	49	52	180

Table 71. I have not had time to get certified.

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Not Selected	24	4	2	29	1	0	45	40	145
	70.6 %	80 %	50 %	87.9 %	33.3 %	0 %	91.8 %	76.9 %	80.6 %
Selected	10	1	2	4	2	0	4	12	35
	29.4 %	20 %	50 %	12.1 %	66.7 %	0 %	8.2 %	23.1 %	19.4 %
Total	34	5	4	33	3	0	49	52	180

Table 72. The certification process is too time-consuming.

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Not Selected	28	4	4	32	2	0	45	44	159
	82.4 %	80 %	100 %	97 %	66.7 %	0 %	91.8 %	84.6 %	88.3 %
Selected	6	1	0	1	1	0	4	8	21
	17.6 %	20 %	0 %	3 %	33.3 %	0 %	8.2 %	15.4 %	11.7 %
Total	34	5	4	33	3	0	49	52	180

Table 73. Certification does not benefit my firm.

	<i>Owners' Minority Status</i>								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Not Selected	32	4	4	29	3	0	42	47	161
	94.1 %	80 %	100 %	87.9 %	100 %	0 %	85.7 %	90.4 %	89.4 %
Selected	2	1	0	4	0	0	7	5	19
	5.9 %	20 %	0 %	12.1 %	0 %	0 %	14.3 %	9.6 %	10.6 %
Total	34	5	4	33	3	0	49	52	180

Table 74. Certification will negatively impact my company.

	Owners' Minority Status								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	Total
Not Selected	34	5	4	33	3	0	49	52	180
	100 %	100 %	100 %	100 %	100 %	0 %	100 %	100 %	100 %
Selected	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Total	34	5	4	33	3	0	49	52	180

Table 75. I do not understand how certification can benefit my firm.

	Owners' Minority Status								
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	Total
Not Selected	25	4	2	26	3	0	39	38	137
	73.5 %	80 %	50 %	78.8 %	100 %	0 %	79.6 %	73.1 %	76.1 %
Selected	9	1	2	7	0	0	10	14	43
	26.5 %	20 %	50 %	21.2 %	0 %	0 %	20.4 %	26.9 %	23.9 %
Total	34	5	4	33	3	0	49	52	180

Table 76. Other (fill in blank):

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Not Selected	30	3	4	29	3	0	41	40	150
	88.2 %	60 %	100 %	87.9 %	100 %	0 %	83.7 %	76.9 %	83.3 %
Selected	4	2	0	4	0	0	8	12	30
	11.8 %	40 %	0 %	12.1 %	0 %	0 %	16.3 %	23.1 %	16.7 %
Total	34	5	4	33	3	0	49	52	180

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Table 77. For participants who responded 'Other' to the question above and provided an explanation why, responses fell in the following categories.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Did not find it necessary	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Do not see opportunities in my field of work.	0	0	0	0	0	0	0	2	2
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	66.7 %	33.3 %
Do not want to do business with Palm Beach County.	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
I meant to register but have not gotten around to it yet.	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Does not know	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Other	2	0	0	1	0	0	0	0	3
	100 %	0 %	0 %	100 %	0 %	0 %	0 %	0 %	50 %
Not applicable	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Registered in Broward	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Not worth the cost	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	33.3 %	16.7 %
Not aware business was eligible	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Total	2	0	0	1	0	0	0	3	6

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Table 78. How many times have you been denied a commercial (business) bank loan from January 1, 2019, through December 31, 2023?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	60	5	7	37	4	1	53	73	240
	52.6 %	41.7 %	77.8 %	60.7 %	80 %	100 %	81.5 %	72.3 %	65.2 %
1-10	37	4	2	19	0	0	6	12	80
	32.5 %	33.3 %	22.2 %	31.1 %	0 %	0 %	9.2 %	11.9 %	21.7 %
11-25	6	0	0	0	0	0	0	0	6
	5.3 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	1.6 %
26-50	1	0	0	0	0	0	0	0	1
	0.9 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0.3 %
51-100	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Over 100	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Don't Know/NA	10	3	0	5	1	0	6	16	41
	8.8 %	25 %	0 %	8.2 %	20 %	0 %	9.2 %	15.8 %	11.1 %
Total	114	12	9	61	5	1	65	101	368

Table 79. Do you feel as though you experienced discriminatory behavior from the private sector (i.e., non-governmental entities) from January 1, 2019, through December 31, 2023?

Responses	Owners' Minority Status								<i>Total</i>
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	43	2	0	12	2	0	2	9	70
	37.7 %	16.7 %	0 %	19.7 %	40 %	0 %	3.1 %	8.9 %	19 %
No	39	5	5	36	3	1	52	67	208
	34.2 %	41.7 %	55.6 %	59 %	60 %	100 %	80 %	66.3 %	56.5 %
Do Not Know	32	5	4	13	0	0	11	25	90
	28.1 %	41.7 %	44.4 %	21.3 %	0 %	0 %	16.9 %	24.8 %	24.5 %
<i>Total</i>	114	12	9	61	5	1	65	101	368

Table 80. Do you feel as though you experienced discriminatory behavior from Palm Beach County government from January 1, 2019, through December 31, 2023?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	21	2	0	5	1	0	4	11	44
	18.4 %	16.7 %	0 %	8.2 %	20 %	0 %	6.2 %	10.9 %	12 %
No	61	5	5	34	3	1	51	65	225
	53.5 %	41.7 %	55.6 %	55.7 %	60 %	100 %	78.5 %	64.4 %	61.1 %
Do Not Know	32	5	4	22	1	0	10	25	99
	28.1 %	41.7 %	44.4 %	36.1 %	20 %	0 %	15.4 %	24.8 %	26.9 %
Total	114	12	9	61	5	1	65	101	368

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Table 81. For participants who provided an explanation to the question above, responses fell in the following categories.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Selected but never utilized	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	12.5 %	3.3 %
No notification of open solicitations	1	0	0	0	0	0	0	0	1
	6.7 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	3.3 %
Bid retracted without communication	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Unfair competition with large firms	2	0	0	0	0	0	0	3	5
	13.3 %	0 %	0 %	0 %	0 %	0 %	0 %	37.5 %	16.7 %
Broken promises	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	33.3 %	0 %	0 %	0 %	0 %	3.3 %
Lack of communication or response from county	1	0	0	0	0	0	0	2	3
	6.7 %	0 %	0 %	0 %	0 %	0 %	0 %	25 %	10 %
Informal networks	2	0	0	0	0	0	0	0	2
	13.3 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	6.7 %
Retaliation or blackballing	1	0	0	0	0	0	0	0	1
	6.7 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	3.3 %
County decides who will win prior to bidding process	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	33.3 %	0 %	0 %	0 %	0 %	3.3 %
Physical address requirement	1	0	0	0	0	0	0	0	1
	6.7 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	3.3 %
Other	2	1	0	0	0	0	1	1	5
	13.3 %	100 %	0 %	0 %	0 %	0 %	33.3 %	12.5 %	16.7 %
	0	0	0	1	0	0	0	0	1

PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table 81. For participants who provided an explanation to the question above, responses fell in the following categories.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Excessive paperwork	0 %	0 %	0 %	33.3 %	0 %	0 %	0 %	0 %	3.3 %
Negative performance report	1	0	0	0	0	0	0	0	1
	6.7 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	3.3 %
Discriminatory requirements	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Never selected	2	0	0	0	0	0	0	0	2
	13.3 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	6.7 %
General experience of discrimination	1	0	0	0	0	0	0	0	1
	6.7 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	3.3 %
Suspensions regarding selection process	0	0	0	0	0	0	1	0	1
	0 %	0 %	0 %	0 %	0 %	0 %	33.3 %	0 %	3.3 %
African American firms unfairly prioritized among minority firms	0	0	0	0	0	0	1	0	1
	0 %	0 %	0 %	0 %	0 %	0 %	33.3 %	0 %	3.3 %
Misaligned requirements	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Misclassified by county	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	12.5 %	3.3 %
Prime decides who will win prior to bidding process	1	0	0	0	0	0	0	0	1
	6.7 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	3.3 %
Total	15	1	0	3	0	0	3	8	30

Table 82. Do you believe there is an informal network (a closed group of businesses that have existing relationships with County purchasing) of prime contractors/vendors and subcontractors doing business with Palm Beach County that monopolizes the public contracting process?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	82	6	6	33	4	1	19	50	201
	71.9 %	50 %	66.7 %	54.1 %	80 %	100 %	29.2 %	49.5 %	54.6 %
No	32	6	3	28	1	0	46	51	167
	28.1 %	50 %	33.3 %	45.9 %	20 %	0 %	70.8 %	50.5 %	45.4 %
Total	114	12	9	61	5	1	65	101	368

Table 83. My company's exclusion from this informal network has prevented us from winning contracts with Palm Beach County.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	23	2	1	11	1	0	3	10	51
	28 %	33.3 %	16.7 %	33.3 %	25 %	0 %	15.8 %	20 %	25.4 %
Agree	15	2	2	10	0	0	7	12	48
	18.3 %	33.3 %	33.3 %	30.3 %	0 %	0 %	36.8 %	24 %	23.9 %
Neither Agree or Disagree	37	2	3	10	3	0	7	26	88
	45.1 %	33.3 %	50 %	30.3 %	75 %	0 %	36.8 %	52 %	43.8 %
Disagree	6	0	0	0	0	1	0	1	8
	7.3 %	0 %	0 %	0 %	0 %	100 %	0 %	2 %	4 %
Strongly Disagree	1	0	0	2	0	0	2	1	6
	1.2 %	0 %	0 %	6.1 %	0 %	0 %	10.5 %	2 %	3 %
Total	82	6	6	33	4	1	19	50	201

Table 84. Prime contractor/vendors use double standards, or standards that are inequitably applied in qualifications or in work performance that make it more difficult for Minority, and Women-owned businesses to gain work as subcontractors.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	27	2	1	9	2	0	5	10	56
	23.7 %	16.7 %	11.1 %	14.8 %	40 %	0 %	7.7 %	9.9 %	15.2 %
Agree	24	3	2	16	1	0	9	16	71
	21.1 %	25 %	22.2 %	26.2 %	20 %	0 %	13.8 %	15.8 %	19.3 %
Neither Agree or Disagree	57	5	5	27	1	1	35	65	196
	50 %	41.7 %	55.6 %	44.3 %	20 %	100 %	53.8 %	64.4 %	53.3 %
Disagree	5	1	1	4	0	0	7	8	26
	4.4 %	8.3 %	11.1 %	6.6 %	0 %	0 %	10.8 %	7.9 %	7.1 %
Strongly Disagree	1	1	0	5	1	0	9	2	19
	0.9 %	8.3 %	0 %	8.2 %	20 %	0 %	13.8 %	2 %	5.2 %
Total	114	12	9	61	5	1	65	101	368

Table 85. Palm Beach County is generally accommodating to the language needs of its vendor community.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	16	2	1	7	1	0	14	10	51
	14 %	16.7 %	11.1 %	11.5 %	20 %	0 %	21.5 %	9.9 %	13.9 %
Agree	26	1	1	12	0	0	16	25	81
	22.8 %	8.3 %	11.1 %	19.7 %	0 %	0 %	24.6 %	24.8 %	22 %
Neither Agree or Disagree	66	9	6	32	4	1	32	61	211
	57.9 %	75 %	66.7 %	52.5 %	80 %	100 %	49.2 %	60.4 %	57.3 %
Disagree	4	0	1	7	0	0	1	4	17
	3.5 %	0 %	11.1 %	11.5 %	0 %	0 %	1.5 %	4 %	4.6 %
Strongly Disagree	2	0	0	3	0	0	2	1	8
	1.8 %	0 %	0 %	4.9 %	0 %	0 %	3.1 %	1 %	2.2 %
Total	114	12	9	61	5	1	65	101	368

Table 86. Sometimes, a prime contractor/vendor will contact a Small, Minority, or Woman-owned business to ask for quotes but never give the proposal sufficient review to consider giving that firm the award.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	24	1	0	14	1	0	6	12	58
	21.1 %	8.3 %	0 %	23 %	20 %	0 %	9.2 %	11.9 %	15.8 %
Agree	33	2	3	15	0	0	6	13	72
	28.9 %	16.7 %	33.3 %	24.6 %	0 %	0 %	9.2 %	12.9 %	19.6 %
Neither Agree or Disagree	55	8	6	26	3	1	47	72	218
	48.2 %	66.7 %	66.7 %	42.6 %	60 %	100 %	72.3 %	71.3 %	59.2 %
Disagree	2	1	0	2	0	0	2	1	8
	1.8 %	8.3 %	0 %	3.3 %	0 %	0 %	3.1 %	1 %	2.2 %
Strongly Disagree	0	0	0	4	1	0	4	3	12
	0 %	0 %	0 %	6.6 %	20 %	0 %	6.2 %	3 %	3.3 %
Total	114	12	9	61	5	1	65	101	368

Table 87. Sometimes, a prime contractor/vendor will include a Small, Minority, or Woman-owned subcontractor on a bid or other solicitations to meet participation goals, then drop the company as a subcontractor after winning the award.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	14	1	1	13	1	0	4	9	43
	12.3 %	8.3 %	11.1 %	21.3 %	20 %	0 %	6.2 %	8.9 %	11.7 %
Agree	26	2	1	9	0	0	9	8	55
	22.8 %	16.7 %	11.1 %	14.8 %	0 %	0 %	13.8 %	7.9 %	14.9 %
Neither Agree or Disagree	68	8	6	31	3	1	46	82	245
	59.6 %	66.7 %	66.7 %	50.8 %	60 %	100 %	70.8 %	81.2 %	66.6 %
Disagree	6	1	1	4	0	0	2	1	15
	5.3 %	8.3 %	11.1 %	6.6 %	0 %	0 %	3.1 %	1 %	4.1 %
Strongly Disagree	0	0	0	4	1	0	4	1	10
	0 %	0 %	0 %	6.6 %	20 %	0 %	6.2 %	1 %	2.7 %
Total	114	12	9	61	5	1	65	101	368

Table 88. In general, Minority and Women-owned firms tend to be viewed by the County and/or prime contractor/vendors as less competent than non-minority male-owned businesses.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	25	3	0	8	2	0	3	11	52
	21.9 %	25 %	0 %	13.1 %	40 %	0 %	4.6 %	10.9 %	14.1 %
Agree	27	2	1	15	0	0	8	23	76
	23.7 %	16.7 %	11.1 %	24.6 %	0 %	0 %	12.3 %	22.8 %	20.7 %
Neither Agree or Disagree	54	5	6	33	2	1	40	62	203
	47.4 %	41.7 %	66.7 %	54.1 %	40 %	100 %	61.5 %	61.4 %	55.2 %
Disagree	6	1	2	2	0	0	7	2	20
	5.3 %	8.3 %	22.2 %	3.3 %	0 %	0 %	10.8 %	2 %	5.4 %
Strongly Disagree	2	1	0	3	1	0	7	3	17
	1.8 %	8.3 %	0 %	4.9 %	20 %	0 %	10.8 %	3 %	4.6 %
Total	114	12	9	61	5	1	65	101	368

Table 89. I believe that some non-minority prime contractors/vendors only utilize small minority and women-owned companies when required to do so by Palm Beach County.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	40	2	0	14	2	0	6	16	80
	35.1 %	16.7 %	0 %	23 %	40 %	0 %	9.2 %	15.8 %	21.7 %
Agree	20	3	3	10	1	0	9	25	71
	17.5 %	25 %	33.3 %	16.4 %	20 %	0 %	13.8 %	24.8 %	19.3 %
Neither Agree or Disagree	53	7	5	29	1	1	45	55	196
	46.5 %	58.3 %	55.6 %	47.5 %	20 %	100 %	69.2 %	54.5 %	53.3 %
Disagree	1	0	1	5	0	0	3	3	13
	0.9 %	0 %	11.1 %	8.2 %	0 %	0 %	4.6 %	3 %	3.5 %
Strongly Disagree	0	0	0	3	1	0	2	2	8
	0 %	0 %	0 %	4.9 %	20 %	0 %	3.1 %	2 %	2.2 %
Total	114	12	9	61	5	1	65	101	368

Table 90. There is full transparency of Palm Beach County's procurement processes and its sharing of information.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	7	1	1	3	1	0	7	4	24
	6.1 %	8.3 %	11.1 %	4.9 %	20 %	0 %	10.8 %	4 %	6.5 %
Agree	24	1	1	8	0	0	8	14	56
	21.1 %	8.3 %	11.1 %	13.1 %	0 %	0 %	12.3 %	13.9 %	15.2 %
Neither Agree or Disagree	58	9	5	35	3	1	40	60	211
	50.9 %	75 %	55.6 %	57.4 %	60 %	100 %	61.5 %	59.4 %	57.3 %
Disagree	12	0	1	10	1	0	6	16	46
	10.5 %	0 %	11.1 %	16.4 %	20 %	0 %	9.2 %	15.8 %	12.5 %
Strongly Disagree	13	1	1	5	0	0	4	7	31
	11.4 %	8.3 %	11.1 %	8.2 %	0 %	0 %	6.2 %	6.9 %	8.4 %
Total	114	12	9	61	5	1	65	101	368

Table 91. Palm Beach County provides adequate outreach and supportive services to businesses interested in contracting with the County.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Strongly Agree	7	1	1	6	1	0	10	5	31
	6.1 %	8.3 %	11.1 %	9.8 %	20 %	0 %	15.4 %	5 %	8.4 %
Agree	27	0	1	7	0	1	14	9	59
	23.7 %	0 %	11.1 %	11.5 %	0 %	100 %	21.5 %	8.9 %	16 %
Neither Agree or Disagree	53	9	5	28	1	0	33	57	186
	46.5 %	75 %	55.6 %	45.9 %	20 %	0 %	50.8 %	56.4 %	50.5 %
Disagree	17	1	1	15	0	0	3	20	57
	14.9 %	8.3 %	11.1 %	24.6 %	0 %	0 %	4.6 %	19.8 %	15.5 %
Strongly Disagree	10	1	1	5	3	0	5	10	35
	8.8 %	8.3 %	11.1 %	8.2 %	60 %	0 %	7.7 %	9.9 %	9.5 %
Total	114	12	9	61	5	1	65	101	368

Table 92. Would you be willing to provide an interview with G&S to further clarify your responses to the survey?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	76	5	5	38	4	1	30	48	207
	66.7 %	41.7 %	55.6 %	62.3 %	80 %	100 %	46.2 %	47.5 %	56.2 %
No	38	7	4	23	1	0	35	53	161
	33.3 %	58.3 %	44.4 %	37.7 %	20 %	0 %	53.8 %	52.5 %	43.8 %
Total	114	12	9	61	5	1	65	101	368

PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table 93. For participants who provided a comment, responses fell in the following categories.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
No comment	15	0	1	5	0	0	9	7	37
	46.9 %	0 %	100 %	33.3 %	0 %	0 %	56.2 %	35 %	42 %
Will not bid again	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	5 %	1.1 %
Need more opportunities in professional fields	1	0	0	0	0	0	0	0	1
	3.1 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	1.1 %
Thank you	3	0	0	0	0	0	1	1	5
	9.4 %	0 %	0 %	0 %	0 %	0 %	6.2 %	5 %	5.7 %
No response when bid not won	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	5 %	1.1 %
Never won	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	6.7 %	0 %	0 %	0 %	0 %	1.1 %
Requested phone call/interview	1	1	0	1	0	0	0	1	4
	3.1 %	25 %	0 %	6.7 %	0 %	0 %	0 %	5 %	4.5 %
Discrimination against minority firms	2	0	0	1	0	0	0	0	3
	6.2 %	0 %	0 %	6.7 %	0 %	0 %	0 %	0 %	3.4 %
Excessive requirements	0	0	0	0	0	0	1	0	1
	0 %	0 %	0 %	0 %	0 %	0 %	6.2 %	0 %	1.1 %
Other	2	0	0	0	0	0	0	2	4
	6.2 %	0 %	0 %	0 %	0 %	0 %	0 %	10 %	4.5 %
Minority certification revenue cap is too low	0	1	0	0	0	0	0	0	1
	0 %	25 %	0 %	0 %	0 %	0 %	0 %	0 %	1.1 %
Discouraged from bidding as prime	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	6.7 %	0 %	0 %	0 %	0 %	1.1 %

PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table 93. For participants who provided a comment, responses fell in the following categories.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Interested in providing services	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	6.7 %	0 %	0 %	0 %	0 %	1.1 %
Procurement staff need training	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
New business	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	5 %	1.1 %
Need more information on small jobs	0	0	0	0	0	0	1	0	1
	0 %	0 %	0 %	0 %	0 %	0 %	6.2 %	0 %	1.1 %
Work in a field not used by county	0	0	0	0	0	0	1	1	2
	0 %	0 %	0 %	0 %	0 %	0 %	6.2 %	5 %	2.3 %
Denied business loans	1	0	0	0	0	0	0	0	1
	3.1 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	1.1 %
Payment delays	2	0	0	0	0	0	1	1	4
	6.2 %	0 %	0 %	0 %	0 %	0 %	6.2 %	5 %	4.5 %
Heard about discrimination	1	0	0	1	0	0	0	0	2
	3.1 %	0 %	0 %	6.7 %	0 %	0 %	0 %	0 %	2.3 %
Palm Beach businesses prioritized over Broward	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Need further review of studies	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
May relocate to Palm Beach if more bids won	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Survey not applicable to business	0	1	0	0	0	0	0	3	4
	0 %	25 %	0 %	0 %	0 %	0 %	0 %	15 %	4.5 %

PALM BEACH COUNTY, FL 2025 DISPARITY STUDY

Table 93. For participants who provided a comment, responses fell in the following categories.

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Don't know how to bid	0	1	0	0	0	0	1	1	3
	0 %	25 %	0 %	0 %	0 %	0 %	6.2 %	5 %	3.4 %
Portal prioritizes construction projects	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	6.7 %	0 %	0 %	0 %	0 %	1.1 %
Survey wastes time	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Need Spanish language version of survey	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	6.7 %	0 %	0 %	0 %	0 %	1.1 %
Contracted below formal bidding requirement	1	0	0	0	0	0	0	0	1
	3.1 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	1.1 %
Awards are predetermined	1	0	0	1	0	0	1	0	3
	3.1 %	0 %	0 %	6.7 %	0 %	0 %	6.2 %	0 %	3.4 %
Informal networks	1	0	0	0	0	0	0	0	1
	3.1 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	1.1 %
Unfair selection process for new businesses	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	6.7 %	0 %	0 %	0 %	0 %	1.1 %
County wanted a larger firm based on language barriers	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Unfair lowest bid requirement	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Need business mentoring	1	0	0	0	0	0	0	0	1
	3.1 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	1.1 %
Total	32	4	1	15	0	0	16	20	88

PALM BEACH COUNTY

Economic Impact Study
Final Report

September 2025



**GRIFFIN
STRONG**

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I. INTRODUCTION

In addition to the Disparity Study, Palm Beach County (“County”) requested that Griffin & Strong (“G&S”) conduct an Economic Impact Study. This Economic Impact Study is broken down into two major sections: the S/M/WBE (Small, Minority, and Woman-owned Business Enterprise) Cost Differential Analysis and the Economic Impact Analysis.

The S/M/WBE Cost Differential Analysis presents a statistical examination of procurement outcomes for County projects awarded between January 1, 2019, and December 31, 2023. The analysis focuses on identifying the financial impact associated with awarding contracts to vendors other than the lowest bidder, specifically where Affirmative Procurement Initiatives (APIs) were applied. The primary objective of this analysis is to assess whether—and to what extent—Palm Beach County incurred additional costs when contracts were awarded to firms that did not submit the lowest bid because of APIs.

In the Economic Impact Analysis, G&S considers the economic impact of Palm Beach County’s procurement spending with M/WBE and Non-M/WBE firms between January 1, 2019, and December 31, 2023, focusing on the spending’s impact on economic growth, earnings, and job creation for both prime contracts and subcontracts. G&S’s consideration of the disaggregated economic impacts can inform the extent to which increasing the representation of M/WBEs is beneficial for the economic impact of prime contract and subcontract procurement expenditures in Palm Beach County.

A. S/M/WBE Utilization

This is a foundational analysis to first show how the County has utilized Palm Beach County certified S/M/WBEs during the January 1, 2019, and December 31, 2023 (CY2019-2023) period.

G&S undertook an analysis to determine how many and what percentages of all payments made by the County went to Palm Beach County certified S/M/WBEs and how many Palm Beach County certified S/M/WBEs actually received business from the County.

Table 1 demonstrates that of all 1,016 Palm Beach County certified S/M/WBEs, 517 or 50.89%, did not receive an award as a prime or subcontractor between CY2019-2023.

**Table 1: Prime and Subcontractor – No Award
Palm Beach County Certified S/M/WBE Firms
Palm Beach County 2025 Economic Impact Study**

Participation Type	Number of Firms	Percentage of Total
Prime Contractor Only	202	19.88%
Subcontractor Only	175	17.22%
Prime and Subcontractor	122	12.01%
No Award	517	50.89%
TOTAL	1,016	100.00%

Griffin & Strong, 2025

Table 2 demonstrates that of all 1,892 prime and subcontractor payees in the Relevant Geographic Market Area, 498 or 26.32%, were certified as an S/M/WBE with Palm Beach County.

**Table 2: Palm Beach County Certification of all Prime and Subcontractors Who Received Work from the County
Palm Beach County 2025 Economic Impact Study**

Participation Type	Number of Firms	Percentage of Total
Certified S/M/WBE with Palm Beach County	498	26.32%
Not Certified with Palm Beach County	1,394	73.68%
TOTAL	1,892	100.00%

Griffin & Strong, 2025

Table 3 indicates that Palm Beach County Subcontracting totaled \$225,217,650 across all five Industry Categories between January 1, 2019, and December 31, 2023. Of this, \$84,666,423 (37.59%) was allocated to M/WBE firms and \$140,551,227 (62.41%) to White Male-owned firms.

- **Construction:** M/WBE firms received \$33,391,058 (24.70%) in Subcontractor Utilization, while White Male-owned firms received \$101,788,747 (75.30%). Within M/WBEs, MBE firms received \$21,440,052 (15.86%), and White Woman-owned firms received \$11,951,007 (8.84%).
- **Professional Services (CCNA):** White Male-owned firms received \$17,499,661 (41.83%), and M/WBE firms were paid \$24,337,863 (58.17%). In Subcontractor Utilization, Asian American-owned firms received the largest total payment amount in the Professional Services (CCNA) Industry Category amongst all M/WBE groups.

- **Professional Services (Non-CCNA):** M/WBE and White Male-owned firms in Subcontractor Utilization received similar payments, with \$7,292,858 (50.11%) and \$7,261,393 (49.89%), respectively.
- **Services:** White Male-owned firms received \$2,861,398 (14.40%) while M/WBE firms received \$17,004,378 (85.60%). Among all five Industry Categories for Subcontractor Utilization, M/WBE firms achieved by far their largest percentage share of subcontractor payments in Services.
- **Goods/Commodities:** M/WBE firms were paid \$2,640,265 (19.16%), and White Male-owned firms received \$11,140,028 (80.84%).

**Table 3: Subcontractor Utilization Analysis
in the Relevant Geographic Market Area
Distribution of Dollars by Business Ownership and Industry Category
(Using Local Payment Dollars, CY2019-CY2023)
Palm Beach County 2025 Economic Impact Study**

Business Ownership Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities	TOTAL
	(\$)	(\$)	(\$)	(\$)	(\$)	(\$)
African American	\$ 10,982,940	\$ 5,640,441	\$ 5,149,720	\$ 519,009	\$ 1,298,852	\$ 23,590,961
Asian American	\$ 0	\$ 12,929,136	\$ 398,541	\$ 4,287,916	\$ 90,690	\$ 17,706,282
Hispanic American	\$ 10,457,112	\$ 4,279,336	\$ 101,115	\$ 11,388,171	\$ 593,452	\$ 26,819,186
Native American	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0	\$ 0
TOTAL MINORITY	\$ 21,440,052	\$ 22,848,912	\$ 5,649,375	\$ 16,195,096	\$ 1,982,993	\$ 68,116,428
White Women	\$ 11,951,007	\$ 1,488,951	\$ 1,643,483	\$ 809,283	\$ 657,272	\$ 16,549,995
TOTAL MWBE	\$ 33,391,058	\$ 24,337,863	\$ 7,292,858	\$ 17,004,378	\$ 2,640,265	\$ 84,666,423
White Males	\$ 101,788,747	\$ 17,499,661	\$ 7,261,393	\$ 2,861,398	\$ 11,140,028	\$ 140,551,227
TOTAL FIRMS	\$ 135,179,805	\$ 41,837,524	\$ 14,554,251	\$ 19,865,776	\$ 13,780,293	\$ 225,217,650
Business Ownership Classification	Construction	Professional Services (CCNA)	Professional Services (Non-CCNA)	Services	Goods/Commodities	TOTAL
	(%)	(%)	(%)	(%)	(%)	(%)
African American	8.12%	13.48%	35.38%	2.61%	9.43%	10.47%
Asian American	0.00%	30.90%	2.74%	21.58%	0.66%	7.86%
Hispanic American	7.74%	10.23%	0.69%	57.33%	4.31%	11.91%
Native American	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
TOTAL MINORITY	15.86%	54.61%	38.82%	81.52%	14.39%	30.24%
White Women	8.84%	3.56%	11.29%	4.07%	4.77%	7.35%
TOTAL MWBE	24.70%	58.17%	50.11%	85.60%	19.16%	37.59%
White Males	75.30%	41.83%	49.89%	14.40%	80.84%	62.41%
TOTAL FIRMS	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%

Griffin & Strong, 2025

Note: G&S uses full decimal numbers, so automatic rounding may cause differences within the tables.

II. EXECUTIVE SUMMARY OF FINDINGS

This chapter presents the findings resulting from the Economic Impact Study for Palm Beach County, Florida (hereafter the “County”) for January 1, 2019 – December 31, 2023 (CY2019-CY2023).

A. S/M/WBE Cost Differential Analysis Findings

FINDING 1: AWARD OUTCOMES

While the majority of County projects are awarded to the lowest bidder, a notable share—approximately 16.5%—resulted in awards to firms other than the lowest-priced vendor. At 80%, non-API related causes such as being non-responsive, a Local Price Preference, bid withdrawn, or an unknown reason were the most common reason for the outcome of a low bidder not being awarded a project. For API related causes, SBE Price Preference accounted for the highest number of instances where the low-bidder was not awarded (16) but resulted in the smallest total cost difference among the three API-related causes. Failure to meet a Minimum Mandatory SBE Subcontracting Goal resulted in only five instances but carried the highest aggregate cost difference.

FINDING 2: COST DIFFERENTIAL SUMMARY OF API IMPACT USING AWARD DATA

Table 4 presents a cost differential analysis of projects where the low-bidder was not awarded the contract due to specific API-related preferences—namely, M/WBE Subcontracting Goal, SBE Price Preference, or failure to meet Minimum Mandatory SBE Subcontracting Goals.

For each project, the comparison of the bid amount submitted by the lowest bidders to the amount awarded to the selected vendor quantifies the financial impact of award decisions influenced by the County’s APIs. The totals shown reflect the aggregate cost differences associated with each policy type.

Table 4: Cost Differential by Project
Instances Where Low-Bidder Was Not Awarded Due to API-Related Preferences
Palm Beach County 2025 Economic Impact Study

Reason Low-Bidder Not Awarded	Number of Awards	Total Low-Bid Amount	Total Awarded Amount	Total Cost Difference	Total Cost Difference Percentage
M/WBE Subcontracting Goal	1	\$810,300	\$1,171,460	\$361,160	30.83%
SBE Price Preference	16	\$2,838,667	\$2,930,243	\$91,576	3.13%
Minimum Mandatory SBE Subcontracting Goal	5	\$32,447,968	\$36,003,738	\$3,555,770	9.88%
TOTAL	22	\$36,096,935	\$40,105,441	\$4,008,506	9.99%

Griffin & Strong, 2025

FINDING 3: PRIME AND SUBCONTRACTING COSTS SURVEY RESULTS

Based on the results of the Palm Beach County Survey of Business Owners, of the 115 respondents who have submitted bids, proposals, or other solicitations as a prime for County projects, fourteen responded in the affirmative that they have had to bid more (i.e. higher dollar value) with Palm Beach County due to having to satisfy an S/M/WBE goal on the project. Additionally, when asked if the respondent had ever had to take higher bids from S/M/WBE subcontractors for a County project because they had to satisfy an S/M/WBE goal, five of the 115 respondents selected "Yes". (Griffin & Strong, Survey of Business Owners)

These Survey results show that the County's S/M/WBE goals do not have a substantial cost impact on primes or the County.

FINDING 4 : SURVEY REGRESSION PARAMETER ESTIMATE RESULTS

There is no difference between Non-S/M/WBEs and certified S/M/WBEs that compliance with S/M/WBE goals increases their prime bids on Palm Beach County projects. Additionally there is no difference between Non-S/M/WBEs and certified S/M/WBEs that compliance with S/M/WBE goals increases their subcontracting costs on Palm Beach County projects.

B. Economic Impact Analysis Findings***FINDING 5: ECONOMIC IMPACT OF PRIME PROCUREMENT EXPENDITURE***

An Economic Impact Analysis of Palm Beach County prime procurement expenditure revealed that overall, for its expenditure of \$911,556,484, the total output, earnings and jobs impact were approximately \$1,504,805,613, \$452,059,682, and 7,604, respectively.

Per dollar of expenditure, prime procurement in Palm Beach County induced approximately 1.65 new units of output (goods/services), 0.4949 in earnings, and 0.000008 new jobs.

FINDING 6: ECONOMIC IMPACT OF SUBCONTRACT EXPENDITURE BY PRIME AWARDEES

For subcontract expenditures of \$315,255,494 by prime awardees, the total output, earnings and jobs impact were approximately \$512,289,797, \$132,786,232, and \$2,129, respectively.

Per dollar of expenditure, prime awardee subcontracting induced approximately 1.62 new units of output (goods/service), 0.4212 in earnings, and 0.000007 new jobs.

FINDING 7: OVERALL ECONOMIC IMPACT FOR M/WBE PRIME CONTRACT EXPENDITURES

An impact differential suggests that an M/WBE has a relatively higher economic impact per dollar of prime contract or subcontract award. In this context, reducing any prime contracting and subcontracting disparities between Non-M/WBEs and M/WBEs could result in larger economic impacts for Palm Beach County prime contract expenditures.

III. S/M/WBE COST DIFFERENTIAL ANALYSIS

A. API Impact Using Award Data

1. Introduction

This analysis presents a statistical examination of procurement outcomes for County projects awarded between January 1, 2019, and December 31, 2023. The analysis draws on bid tabulation data collected from all County departments and focuses on identifying the financial impact associated with awarding contracts to vendors other than the lowest bidder, specifically where Affirmative Procurement Initiatives (APIs) were applied.

The primary objective is to assess whether—and to what extent—Palm Beach County incurred additional costs when contracts were awarded to firms that did not submit the lowest bid because of APIs, which are tools and incentives used by the County to promote S/M/WBE participation in contracting, including mandatory subcontracting goals, price preferences, and sheltered markets.¹

Collectively, these tables and summaries offer insight into the financial implications of the County's award decisions and serve as a basis for evaluating the effectiveness and efficiency of related procurement policies.

It should be noted that goals are not applied on all projects and that there are three types of waivers for projects goals:

- (1) department pre-bid waivers, where departments can justify that a proposed goal is feasible;
- (2) good faith efforts waivers, where bidder cannot meet the goal; and
- (3) post-bid waivers, where an intended S/M/WBE subcontractor is no longer available and cannot be replaced.

Table 5 below reflects those waiver requests granted by the Office of Equal Business Opportunity (OEBO) from FY 2019 to the middle of FY 2024. As can be seen in the table, nearly half the waivers were granted in the first years of the S/M/WBE program, 95.5% were Departmental waivers, and only three were good faith efforts waivers.

¹ Palm Beach County Office of Equal Business Opportunity. *Equal Business Opportunity Program Ordinance*. Retrieved from <https://discover.pbc.gov/oebo/Pages/Documents.aspx>

Table 5: Goal Waivers Granted, FY 2019 through Second Quarter FY 2024**Palm Beach County 2025 Economic Impact Study**

Fiscal Year	Department	Good Faith Efforts	Post Bid	Total
FY 2019	144	0	0	144
FY 2020	61	0	1	62
FY 2021	32	1	1	34
FY 2022	32	2	1	35
FY 2023	25	0	5	30
FY 2024 (2 quarters)	6	0	3	9
Total Waivers	300	3	11	314

Source, OEBO, Number of Waivers Granted – FY 2019 – FY 2023, May 6, 2024

2. Methodology

This analysis draws upon bidder and award data sourced from project bid tabulations maintained by multiple Palm Beach County departments. Each bid record includes core elements such as the project number, vendor name, bid amount, and an indicator of whether the vendor won an award. Where available, the dataset was supplemented with information on participation in APIs and contextual procurement notes.

The study focuses on projects solicited and awarded between January 1, 2019, and December 31, 2023. Only those projects with complete and consistent bid and award records were included in the analysis. For example, if there was a bid where there was not a bid amount or bid date listed, then it was not included in the analysis.

To assess cost efficiency related to the County's award decisions, several key classifications were applied. A low bidder is defined as the vendor submitting the lowest bid dollar on a given project. If the low bidder was awarded, the project is categorized as a Low-Bidder Awarded case. If the low bidder was not among the awardees, it is classified as Low Bidder Not Awarded.

3. Key Terms and Affirmative Procurement Initiatives (APIs)

To support equitable participation in County contracting, during the Study Period, the County utilized several Affirmative Procurement Initiatives (APIs) designed to provide opportunities for certified small businesses. These initiatives may influence award outcomes and are defined below:

- **M/WBE Subcontracting Goal:** Certain solicitations may require prime bidders to commit to awarding a percentage of the contract value to certified Minority or Women-owned Business Enterprises (M/WBEs) as subcontractors. ²

² It should be noted that this API is was removed after the Study Period.

- **SBE Price Preference:** For solicitations evaluated on price, certified SBEs may be eligible for a price preference. If the SBE's bid is within 10% of the lowest non-SBE bid, the contract may be awarded to the SBE.
- **Minimum Mandatory SBE Subcontracting Goals³:** Certain solicitations require prime bidders to commit to awarding a minimum percentage of the contract value to certified Small Business Enterprises (SBEs) as subcontractors.

4. Summary of Award Outcomes and Cost Impacts

a) Award Outcomes

Table 6 provides a high-level overview of how frequently the lowest bidder was ultimately awarded a contract across all County projects during the Study Period (CY2019–CY2023). This measure serves as a key indicator of whether the County's procurement decisions typically aligned with cost minimization or whether other criteria, such as policy objectives or responsiveness, influenced final awards.

As shown in Table 6, the low bidder was awarded the contract in approximately 83.5% of projects. However, for 16.49% of all projects, the County selected a vendor that did not submit the lowest bid, suggesting the influence of other factors—such as responsiveness, certification status, API requirements, or programmatic goals—on award outcomes.

Table 6: Summary of Low-Bidder Receiving Awards
Palm Beach County 2025 Economic Impact Study

Award Results	Number of Awards	Percentage of Low Bid Awards
Low-Bidder Not Awarded	110	16.49%
Low-Bidder Awarded	557	83.51%
TOTAL	667	100.00%

Griffin & Strong, 2025

b) Low-Bidder Award Outcomes by API Related Cause

Table 7 further analyzes the 110 instances where the low bidder was not awarded a project to display the causes behind these occurrences. Each project in this summary reflects a case where the vendor offering the lowest price was not selected for award as a prime contractor. The reasons for these outcomes vary and include administrative disqualifications (such as non-responsiveness), bidder-driven decisions (such as bid withdrawals), and award decisions shaped by APIs, such as a M/WBE Subcontracting Goal, SBE Price Preference, or Minimum Mandatory SBE Subcontracting Goal.

³ Palm Beach County Office of Equal Business Opportunity. *Compliance Programs*. Retrieved from <https://discover.pbc.gov/oebo/pages/compliance-programs.aspx>.

Understanding the frequency and distribution of these reasons helps distinguish between cost-driven tradeoffs and procedural enforcement of the County's procurement policies. This breakdown provides critical context for interpreting the cost implications presented in subsequent tables.

Table 7: Summary of API Related Reasons Why Low-Bidder Was Not Awarded
Palm Beach County 2025 Economic Impact Study

Reason Low-Bidder Not Awarded	Number of Awards	Percentage of Total Awards
M/WBE Subcontracting Goal	1	0.91%
SBE Price Preference	16	14.55%
Minimum Mandatory SBE Subcontracting Goal	5	4.55%
Other Reasons	88	80.00%
TOTAL	110	100.00%

Griffin & Strong, 2025

Eighty percent (80%) of the time a low bidder was not awarded a project was due to non-API related causes—listed as Other Reasons—such as being non-responsive, a Local Price Preference, bid withdrawn, or an unknown reason. There was one instance, or 0.91%, where a M/WBE Subcontracting Goal caused a low bidder to not be awarded a project. SBE Price Preferences caused the low bidder not to be awarded a project 16 times, or 14.55%. Failure to meet a Minimum Mandatory SBE Subcontracting Goals caused five instances, or 4.55%.

c) Cost Differential Summary

Table 8 presents a cost differential analysis of projects where the low-bidder was not awarded the contract due to specific API-related preferences, namely, M/WBE Subcontracting Goal, SBE Price Preference, or failure to meet Minimum Mandatory SBE Subcontracting Goal. For each project, the table compares the bid amount submitted by the lowest bidder to the amount awarded to the selected vendor.

This comparison quantifies the financial impact of award decisions influenced by the County's APIs. The totals shown reflect the aggregate cost differences associated with each policy type.

As shown in Table 8, while SBE Price Preference accounted for the highest number of instances where the low bidder was not awarded, it resulted in the smallest total cost difference among the three API-related causes.

In contrast, failure to meet a Minimum Mandatory SBE Subcontracting Goal resulted in the fewest instances but carried the highest aggregate cost difference. This outcome is influenced in part by the size of the projects affected: the associated bid amounts for these cases ranged from \$1.5 million to \$16 million, significantly larger than those affected by SBE or Local Preference.

Table 8: Cost Differential by Project
Instances Where Low-Bidder Was Not Awarded Due to API-Related Preferences
Palm Beach County 2025 Economic Impact Study

Reason Low-Bidder Not Awarded	Number of Awards	Total Low-Bid Amount	Total Awarded Amount	Total Cost Difference	Total Cost Difference Percentage
M/WBE Subcontracting Goal	1	\$810,300	\$1,171,460	\$361,160	30.83%
SBE Price Preference	16	\$2,838,667	\$2,930,243	\$91,576	3.13%
Minimum Mandatory SBE Subcontracting Goal	5	\$32,447,968	\$36,003,738	\$3,555,770	9.88%
TOTAL	22	\$36,096,935	\$40,105,441	\$4,008,506	9.99%

Griffin & Strong, 2025

5. Office of Equal Business Opportunity (OEBO) Expense Summary

In addition to the direct contract differential costs, there is also a cost of running and maintaining the OEBO, excluding general overhead. Table 9 below outlines the budget and actual expenditure of the OEBO for FY 2019-2023, showing that the Office came in below their budgeted amount overall and on a yearly basis.

Table 9: Office of Equal Business Opportunity Expense Summary
Palm Beach County 2025 Economic Impact Study

Fiscal Year	Budgeted Amount	Expended Amount
FY 2019	\$ 207,875.00	\$ 204,437.11
FY 2020	\$ 209,110.00	\$ 162,409.29
FY 2021	\$ 338,425.00	\$ 137,815.19
FY 2022	\$ 335,410.00	\$ 206,181.38
FY 2023	\$ 304,461.00	\$ 208,218.70
TOTAL	\$ 1,395,281.00	\$ 919,061.67

Source: OEBO

6. Conclusion

The S/M/WBE Cost Differential Analysis reveals that while the majority of County projects are awarded to the lowest bidder, a notable share—approximately 16.5%—resulted in awards to firms other than the lowest-priced vendor. At 80%, non-API related causes were the most common reason for the outcome of a low bidder not being awarded a project.

When the decision to bypass the low bidder was tied to an API, the most frequently applied policy was the SBE Price Preference, followed by failure to meet a Minimum Mandatory SBE Subcontracting Goal, and finally an M/WBE Subcontracting Goal.

From a cost perspective, the data shows that while SBE Price Preference led to more award instances, it had relatively minor financial impact—resulting in aggregate cost differences of \$91,576. In contrast, failure to meet the Minimum Mandatory SBE Subcontracting Goal, though less common (4.55% of awards not awarded to the low-bidder), accounted for the highest total cost differential—exceeding \$3.5 million—largely due to the higher dollar value of the affected contracts.

B. S/M/WBE Program Compliance Costs Analysis in Palm Beach County, FL Using Survey Results and Regression Analysis

1. Prime Contracting Costs – Survey Results

Table 27 from the G&S Survey of Business Owners shows responses to the question of how many times the company submitted bids, proposals, or other solicitations for projects as a prime contractor/vendor on Palm Beach County projects. The results show that, of the 368 total respondents to the Study Survey, 115 respondents' companies submitted bids, proposals, or other solicitations for projects as a prime contractor/vendor on Palm Beach County projects.

Table 27. Palm Beach County Public Projects									
Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
None	68	6	4	35	2	1	38	64	218
	59.6 %	50 %	44.4 %	57.4 %	40 %	100 %	58.5 %	63.4 %	59.2 %
1-10	36	4	4	16	1	0	13	20	94
	31.6 %	33.3 %	44.4 %	26.2 %	20 %	0 %	20 %	19.8 %	25.5 %
11-25	2	1	0	2	0	0	0	2	7
	1.8 %	8.3 %	0 %	3.3 %	0 %	0 %	0 %	2 %	1.9 %
26-50	2	0	0	1	0	0	2	1	6
	1.8 %	0 %	0 %	1.6 %	0 %	0 %	3.1 %	1 %	1.6 %
51-100	0	0	0	0	0	0	1	1	2
	0 %	0 %	0 %	0 %	0 %	0 %	1.5 %	1 %	0.5 %
Over 100	1	0	0	1	0	0	2	2	6
	0.9 %	0 %	0 %	1.6 %	0 %	0 %	3.1 %	2 %	1.6 %
Do Not Know/NA	5	1	1	6	2	0	9	11	35
	4.4 %	8.3 %	11.1 %	9.8 %	40 %	0 %	13.8 %	10.9 %	9.5 %
Total	114	12	9	61	5	1	65	101	368

PALM BEACH COUNTY, FL 2025 ECONOMIC IMPACT STUDY

As shown in Table 30 of the Survey, of these 115 respondents who have submitted bids, proposals, or other solicitations as a prime for County projects, 14 responded in the affirmative that they have had to bid more (i.e. higher dollar value) with Palm Beach County due to having to satisfy an S/M/WBE goal on the project. Of those fourteen respondents, five identified as African American, four Women, three Hispanic American, one Asian American, and one Bi-racial.

Table 30. Have you ever had to bid more with Palm Beach County because you had to satisfy a S/M/WBE goal?									
Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	5	1	1	3	0	0	0	4	14
	12.2 %	20 %	25 %	15 %	0 %	0 %	0 %	15.4 %	12.2 %
No	36	4	3	17	1	0	18	22	101
	87.8 %	80 %	75 %	85 %	100 %	0 %	100 %	84.6 %	87.8 %
Total	41	5	4	20	1	0	18	26	115

When the fourteen “Yes” respondents from Table 30 were asked in Table 31 below if they could estimate a percentage of how much more they had to bid due to a goal, four respondents selected 1-5% more, two selected 6-10% more, four selected 11-15% more, and the remaining four selected “Don’t Know”.

Table 31. Can you estimate how much more?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
1-5%	1	0	0	1	0	0	0	2	4
	20 %	0 %	0 %	33.3 %	0 %	0 %	0 %	50 %	28.6 %
6-10%	1	0	0	0	0	0	0	1	2
	20 %	0 %	0 %	0 %	0 %	0 %	0 %	25 %	14.3 %
11-15%	1	1	0	2	0	0	0	0	4
	20 %	100 %	0 %	66.7 %	0 %	0 %	0 %	0 %	28.6 %
16-20%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
21-25%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
More than 25%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Don't Know/NA	2	0	1	0	0	0	0	1	4
	40 %	0 %	100 %	0 %	0 %	0 %	0 %	25 %	28.6 %
Total	5	1	1	3	0	0	0	4	14

When further asked if these fourteen respondents won any of the awards where this situation of bidding more due to a goal applied, Table 32 from the Survey shows that five responded “Yes” and nine responded “No.” Notably, four of the five African American respondents selected that they did not win, as well as two of the four Women respondents, and all three of the Hispanic American respondents.

Table 32. Did you win any of the awards where that applied?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	1	1	1	0	0	0	0	2	5
	20 %	100 %	100 %	0 %	0 %	0 %	0 %	50 %	35.7 %
No	4	0	0	3	0	0	0	2	9
	80 %	0 %	0 %	100 %	0 %	0 %	0 %	50 %	64.3 %
Total	5	1	1	3	0	0	0	4	14

a) *Construction Primes*

Out of the 368 total respondents to the Survey who were within the Relevant Geographic Market Area of Palm Beach County, 42 of those firms identified as Construction firms. Of the 42 Construction firms, eighteen of those firms responded in the affirmative that they have submitted bids, proposals, or other solicitations for projects as a prime contractor/vendor on Palm Beach County public projects. Of those eighteen Construction firms who have bid as a prime contractor on Palm Beach County projects, one firm responded “Yes” when asked if they have ever had to bid more with the County to satisfy a S/M/WBE goal. When that firm was further asked if they could estimate how much more they had to bid, they responded “Do not Know.”

2. Prime Contracting Costs – Survey Regression Parameter Estimates

To the extent that compliance with S/M/WBE public procurement programs causes prime bidders to markup and/or ultimately use S/M/WBE contractors—as a result of additional search costs associated with finding S/M/WBE subcontractors—S/M/WBE compliance could cause higher prime bids, which increase the cost of public procurement.⁴ To explore this possibility, Tables 10 and 11 report OLS (Ordinary Least Squares) parameter estimates where the dependent variable is the standardized linear probability that the firm owner had to bid more on prime contracts to comply with S/M/WBE guidelines at Palm Beach County.

⁴ For a consideration of how the cost of procurement costs can be sensitive to compliance with M/WBE subcontracting requirements, See: Benjamin V. Rosa. 2024. “Subcontracting Requirements and the Cost of Government Procurement,” *RAND Journal of Economics*, 55(1): pp. 3-32.

Relative to firms that are not certified as Small, Minority, or Women-owned businesses (Non-S/M/WBEs) the parameter estimates in Table 10 suggest that there is no difference between Non-S/M/WBE and certified S/M/WBEs that compliance with S/M/WBE goals increases their prime bids on Palm Beach County projects. When disaggregated by the race/ethnicity/gender status of firm owners, the estimated parameters in Table 11 suggest that relative to White Male-owned firms, firms owned by African Americans and Other Race Americans are less likely to agree that compliance with S/M/WBE goals increases their prime bids on Palm Beach County projects. This suggests that to the extent that White Male-owned firms actually increase their bids to comply with S/M/WBE guidelines, prime awards to S/M/WBEs, such as those owned by African Americans and Other Race Americans, can reduce any costs of public procurement associated with S/M/WBE compliance in Palm Beach County.

Table 10: Fixed Effects Regression Parameter Estimates: Firm Certification Type and Effect of S/M/WBE Compliance on Prime Bids
Palm Beach County 2025 Economic Impact Study

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of firm owner had to bid more on prime contracts to comply with S/M/WBE guidelines		
Firm is a Certified Minority business enterprise: (Binary)	0.1077	0.6089
Firm is a Certified Woman business enterprise: (Binary)	0.8211	0.2081
Firm is a Certified Small business enterprise: (Binary)	-0.0501	0.8845
Constant	0.0703	0.0411
Number of Observations	188	
R^2	0.0433	

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Table 11: Fixed Effects Regression Parameter Estimates: Firm Owner Race/Ethnicity/Gender and the Effect of S/M/WBE Compliance on Prime Bids
Palm Beach County 2025 Economic Impact Study

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of firm owner had to bid more on prime contracts to comply with S/M/WBE guidelines		
Firm is African American-owned: (Binary)	-0.3767	0.0472
Firm is Hispanic American-owned: (Binary)	-0.1602	0.4051
Firm is Asian American-owned: (Binary)	0.0570	0.3282
Firm is Bi/Multiracial-owned: (Binary)	0.0411	0.8741
Firm is other race-owned: (Binary)	-0.4181	0.0415
Firm is Woman-owned: (Binary)	0.0342	0.7751
Constant	0.1314	0.2721
Number of Observations	368	
R^2	0.0521	

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3. Subcontracting Costs – Survey Results

The 115 respondents from Table 27 who responded that they have submitted bids, proposals, or other solicitations as a prime vendor for Palm Beach County projects were then asked another set of questions. Table 34 shows that when asked if the respondent had ever had to take higher bids from S/M/WBE subcontractors for a County project because they had to satisfy an S/M/WBE goal, five of the 115 respondents selected “Yes.” Of note, two of these respondents were Asian American, 2 Women, and 1 Hispanic American.

Table 34. Have you ever had to take higher bids from S/M/WBE subcontractors for a project with Palm Beach County because you had to satisfy an S/M/WBE goal?									
<i>Owners' Minority Status</i>									
Responses	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	<i>Total</i>
Yes	0	2	0	1	0	0	0	2	5
	0 %	40 %	0 %	5 %	0 %	0 %	0 %	7.7 %	4.3 %
No	41	3	4	19	1	0	18	24	110
	100 %	60 %	100 %	95 %	100 %	0 %	100 %	92.3 %	95.7 %
<i>Total</i>	41	5	4	20	1	0	18	26	115

These five respondents were similarly asked if they could estimate a percentage for how much higher the bid was that they had to take from the S/M/WBE subcontractor for a County project with a goal. Table 35 from the Survey shows that two estimated between 6-10%, one selected 16-20%, and one selected "Don't Know".

Table 35. Can you estimate how much more?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
1-5%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
6-10%	0	1	0	0	0	0	0	1	2
	0 %	50 %	0 %	0 %	0 %	0 %	0 %	50 %	40 %
11-15%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
16-20%	0	0	0	0	0	0	0	1	1
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	50 %	20 %
21-25%	0	0	0	1	0	0	0	0	1
	0 %	0 %	0 %	100 %	0 %	0 %	0 %	0 %	20 %
More than 25%	0	0	0	0	0	0	0	0	0
	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %
Don't Know/NA	0	1	0	0	0	0	0	0	1
	0 %	50 %	0 %	0 %	0 %	0 %	0 %	0 %	20 %
Total	0	2	0	1	0	0	0	2	5

These five respondents were again further asked if they won any of the awards where this situation of having to accept a higher bid from an S/M/WBE subcontractor due to a goal applied. Three of the respondents selected “Yes” and two selected “No.”

Table 36. Did you win any of the awards where that applied?

Responses	Owners' Minority Status								Total
	African American	Asian American	Bi-racial	Hispanic American	Multiple Minority Owners	Other	White	Woman	
Yes	0	2	0	0	0	0	0	1	3
	0 %	100 %	0 %	0 %	0 %	0 %	0 %	50 %	60 %
No	0	0	0	1	0	0	0	1	2
	0 %	0 %	0 %	100 %	0 %	0 %	0 %	50 %	40 %
Total	0	2	0	1	0	0	0	2	5

4. Subcontracting Costs – Survey Regression Parameter Estimates

To the extent that compliance with S/M/WBE public procurement programs causes prime bidders to markup and or ultimately use S/M/WBE contractors—as a result of additional search costs associated with finding S/M/WBE subcontractors—S/M/WBE compliance could cause prime contractors to pay more for subcontractors. This could increase their operating expenses, causing them to place higher bids in subsequent pursuit of public contracts, which increases the cost of public procurement. To explore this possibility, Tables 12 and 13 report OLS parameter estimates where the dependent variable is the standardized linear probability that the firm owner had to take a higher bid from subcontractors to comply with S/M/WBE guidelines at Palm Beach County.

Relative to firms not certified as Small, Minority, or Women-owned businesses (Non-S/M/WBEs), the parameter estimates in Table 12 suggest that there is no difference between Non-S/M/WBEs and certified S/M/WBEs that compliance with S/M/WBE goals increases their subcontracting costs on Palm Beach County projects. When disaggregated by the race/ethnicity/gender status of firm owners, the estimated parameters in Table 13 suggest that relative to White Male-owned firms, firms owned by Hispanic Americans are more likely to agree that compliance with S/M/WBE goals increases their subcontracting costs on Palm Beach County projects. This suggests that in Palm Beach County, only firms owned by Hispanic Americans are cost-burdened by S/M/WBE compliance guidelines in their subcontracting costs.

Table 12: Fixed Effects Regression Parameter Estimates: Firm Certification Type and Solicitation/Use of S/M/WBEs By Non-Minority Prime Contractors

In Palm Beach County

Palm Beach County 2025 Economic Impact Study

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of firm owner taking higher bid from subcontractor to comply with S/M/WBE guidelines		
Firm is a Certified Minority business enterprise: (Binary)	0.1410	0.7423
Firm is a Certified Woman business enterprise: (Binary)	0.1290	0.4750
Firm is a Certified Small business enterprise: (Binary)	0.0962	0.7112
Constant	0.1031	0.0374
Number of Observations	81	
R^2	0.0177	

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Table 13: Fixed Effects Regression Parameter Estimates: Firm Owner Race/Ethnicity/Gender and Solicitation/Use of S/M/WBEs By Non-Minority Prime Contractors in Palm Beach County

Palm Beach County 2025 Economic Impact Study

	Coefficient	P-value
<i>Regressand:</i> Standardized linear prediction of firm owner taking higher bid from subcontractor to comply with S/M/WBE guidelines		
Firm is African American-owned: (Binary)	0.2146	0.2682
Firm is Hispanic American-owned: (Binary)	0.4014	0.0039
Firm is Asian American-owned: (Binary)	-0.1511	0.6948
Firm is Bi/Multiracial-owned: (Binary)	0.1008	0.6928
Firm is other race-owned: (Binary)	0.3159	0.1998
Firm is Woman-owned: (Binary)	-0.0448	0.7828
Constant	-0.0332	0.0171
Number of Observations	166	
R^2	0.0318	

Griffin & Strong, 2025

5. Conclusion

These Survey results in this section show that the County's S/M/WBE goals do not have a substantial cost impact on primes or the County. The regression results show that there is no difference between Non-S/M/WBE and certified S/M/WBEs that compliance with S/M/WBE goals increases their prime bids or subcontracting costs on Palm Beach County projects.

IV. THE ECONOMIC IMPACT OF PRIME CONTRACT AND SUBCONTRACT PROCUREMENT SPENDING IN PALM BEACH COUNTY, FL

A. Methodology and Data

In this section, G&S considers the economic impact of Palm Beach County's procurement spending on M/WBE and Non-M/WBE firms from January 1, 2019, to December 31, 2023, focusing on its impact on economic growth, earnings, and job creation in five industry sectors, for both prime contracts and subcontracts. As prime procurement constitutes expenditures in an economy, it can induce other economic activity that can increase the output of additional goods/service, and increase labor market earnings/employment. The G&S Economic Impact Analysis considers the economic impact of prime contract and subcontract procurement expenditures for Palm Beach County overall, and the disaggregated effects attributed to M/WBEs. G&S's consideration of the disaggregated economic impacts can inform the extent to which increasing the representation of M/WBEs is beneficial for the economic impact of prime contract and subcontract procurement expenditures in Palm Beach County.

Methodologically, the G&S Economic Impact Analysis utilizes the Regional Input-Output Modeling System (RIMS II), which is developed and maintained by the US Bureau of Economic Analysis.⁵ The core idea informing RIMS II is that an increase in economic expenditure results in additional rounds of spending. Building a new road, for example, can lead to increased production of asphalt and concrete, or an increased production of asphalt and concrete can lead to more mining. Workers hired from these induced changes in economic activity will spend more, inducing additional rounds of spending/production. RIMS II provides the multipliers which enable estimates of how increases in particular economic activity in a region impacts other industries located in the region with respect to output, value added, earnings, and employment.⁶ This analysis considers changes in economic activity induced by Palm Beach County prime procurement expenditure.⁷

The Palm Beach County prime and subcontract expenditure data is from the January 1, 2019, to December 31, 2023, time period (Study Period). The expenditure data was disaggregated across five categories: (1) Construction, (2) Professional Services—Consultants' Competitive Negotiation Act (CCNA)—Compliant, (3) Professional Services (Non-CCNA), (4) Professional, Scientific & Technical Services, and (5) Good and

⁵ See: <https://www.bea.gov/resources/methodologies/RIMSII-user-guide>.

⁶ Let X = some measure of economic activity, Y = change in some expenditure, the RIMS II framework views the economy as $X = AX + Y$ or $X = (I - A)^{-1} Y$, such that $\Delta X = (I - A)^{-1} \Delta Y$. This is a characterization of the economy in which total output (X) is equal to the sum of intermediate products plus final output/demand Y . The vector $=(I - A)^{-1}$ contains the multipliers informing the economic impact (ΔX) of a change in new expenditure (ΔY).

⁷ RIMS II requires six crucial assumptions to rationalize its economic impact framework: (1) Backward linkages, (2) Fixed purchase patterns, (3) Industry homogeneity, (4) No supply constraints, (5) No regional feedback, and (6), No time dimension. In a backward-linkage model, an increase in demand for output results in an increase in the demand for inputs. Fixed purchase patterns assume that industries do not change the relative mix of inputs used to produce output. Industry homogeneity assumes that all businesses in an industry use the same production process. No supply constraints assume no price adjustment in response to supply constraints. No regional feedback assumes the absence of any feedback among regions—multipliers are region-specific. No time dimension assumes the length of time that it takes for the total impact of an initial change in economic activity to be completely realized is unclear.

Commodities.⁸ Total prime expenditure across all these categories was approximately \$911,556,484. Of this total, approximately 12%, or \$104,850,088, was spent on prime awards to M/WBEs.

RIMS II provides multipliers for both detailed industries and aggregate industries. In general, the level of industry detail used in an Economic Impact Study is often determined by practical considerations, namely utilizing a level of detail that provides at least an approximation to the industry responsible for the change in demand (ΔY). The G&S approach to the Economic Impact Analysis subscribes to the notion that multipliers for the detailed industries are more likely to capture the true structure of the industry and are less subject to aggregation bias.

To best align with the five Industry Categories used in this Disparity Study which are Construction, CCNA Professional Services, Non-CCNA Professional Services, Services, and Goods/Commodities, G&S determined that three Type II multipliers relevant for the expenditure categories were (1) Construction; (2) Professional, Scientific, and Technical Services, which represents the combined expenditures across Palm Beach County's prime contracts in Professional Services both CCNA and Non-CCNA and Other Services; and (3) Wholesale Trade, used to represent Goods/Commodities procurements.⁹ The economic impacts estimated are (1) Change in Total Output (newly produced goods and services), (2) Change in Earnings, and (3) Change in Employment. G&S treats the total prime contracting expenditures by Palm Beach County, as a change in final demand, and similarly for the amount allocated to disaggregated M/WBEs and Non-M/WBEs.¹⁰

B. Economic Impact Findings

The results of the G&S Economic Impact Analysis for prime contract procurement expenditures are reported in Table 14. In addition to the relevant economic impacts, G&S also reports the impact ratio for each impact which informs how effective the economic impact is across the disaggregated groupings. In particular, the impact ratio measures the relevant economic impact (e.g. output, earnings, employment) per dollar of expenditure. For example, the first row indicates that for the aggregate prime contracting expenditures by Palm Beach County of \$911,556,484 the total output, earnings, and jobs impact were \$1,504,805,613, \$452,059,682, and \$7,604, respectively. Per dollar of expenditure, this induced approximately \$1.65 new units of output, 0.4949 in earnings, and 0.000008 new jobs.

⁸ The CCNA was enacted by the Florida Legislature in 1973. It governs the processes required for procurement of professional design services for certain public sector projects, and is a practice adopted by many political jurisdictions across the US in their procurement processes.

⁹ RIMS II provides two types of multipliers: Type I and Type II. G&S utilizes Type II multipliers. In contrast to Type I multipliers Type II multipliers not only account for the interindustry effect, but they also account for the induced impact of a final-demand change. The induced impact related to the spending of workers whose earnings are affected by a final-demand change. This allows for estimating a broader economic impact of a change in final demand, which includes the economic impact outside of the region under consideration.

¹⁰ Final demand is the total demand for goods and services by end-users, including households, governments, and foreign buyers, as opposed to intermediate demand, which represents demand for goods and services used in the production process. The sum of final demand enables estimates of Gross Domestic Product---or the value of newly produced goods/services.

Among the M/WBE groups, White Women, Asian Americans, and Hispanic Americans exhibited output impact ratios exceeding the overall average. Additionally, four groups White Women, Asian Americans, African Americans, and Hispanic Americans, showed greater impact per dollar in both earnings and employment relative to the overall impact ratios.

Table 14: Economic Impact of Palm Beach County Prime Contract Award Expenditures
Palm Beach County 2025 Economic Impact Study

Economic Entity/Spending Unit	Total Output Impact	Total Earnings Impact	Total Employment Impact	Output Impact Ratio	Earnings Impact Ratio	Employment Impact Ratio
All	\$1,504,805,613	\$452,059,682	7,604	1.651	0.4959	0.000008
White Males	\$1,329,404,028	\$395,005,289	6,648	1.648	0.4896	0.000008
White Women	\$64,324,563	\$21,478,230	358	1.681	0.5614	0.000009
Asian Americans	\$32,424,505	\$10,342,036	166	1.676	0.5348	0.000009
African Americans	\$25,870,043	\$8,017,248	141	1.648	0.5109	0.000009
Hispanic Americans	\$52,797,542	\$17,251,992	290	1.673	0.5467	0.000009
Native Americans	\$0	\$0	0	0.0	0.0	0.0

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The results of the G&S Economic Impact Analysis for subcontract procurement expenditures by prime contract awardees are reported in Table 15. For the aggregate subcontracting expenditures by Palm Beach County prime awardees of \$315,255,494, the total output, earnings, and jobs impact were approximately \$512,289,797, \$132,786,232, and 2,129, respectively. Per dollar of expenditure this induced approximately 1.62 new units of output, .4212 in earnings, and .000007 new jobs.

Two M/WBE classifiable groups (Asian Americans and Hispanic Americans) have higher output impact ratios larger than the overall output impact. Two (Asian Americans and Hispanic Americans) have earnings impact ratios larger than the overall earnings impact. Two (Asian Americans and Hispanic Americans) have employment impact ratios larger than the overall employment impact ratio.

Table 15: Economic Impact of Palm Beach County Subcontract Award Expenditures
Palm Beach County 2025 Economic Impact Study

Economic Entity/Spending Unit	Total Output Impact	Total Earnings Impact	Total Employment Impact	Output Impact Ratio	Earnings Impact Ratio	Employment Impact Ratio
All	\$512,289,797	\$132,786,232	2,130	1.625	0.4212	0.000007
White Males	\$290,526,793	\$73,193,094	1,164	1.620	0.4082	0.000006
White Women	\$34,319,001	\$8,725,809	138	1.623	0.4126	0.000006
Asian Americans	\$57,686,579	\$15,683,074	261	1.629	0.4429	0.000007
African Americans	\$61,670,173	\$21,925,913	253	1.704	0.6057	0.000007
Hispanic Americans	\$70,750,670	\$19,465,124	312	1.638	0.4508	0.000007
Native Americans	\$0	\$0	0	0.0	0.0	0.0

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For both prime contract and subcontract expenditure, the M/WBE impact differentials (the M/WBE impact relative to Non-M/WBEs) suggest that increasing the representation of M/WBEs among Palm Beach County contract awardees could enhance the overall economic impact of prime contract expenditures. An implication of the estimated economic impacts suggest that relative to Non-M/WBEs, prime contract and subcontract awards to M/WBEs could induce more economic activity resulting in larger economic impacts. Of course, this presumes the regional economy is not in equilibrium—and RIMS II is a static model that cannot account for a dynamic equilibrium in which all markets clear. However, G&S finds higher differential impacts for some M/WBEs. This suggests that an equilibrium of prime contract and subcontract awards in Palm Beach County that increases the representation of M/WBEs could result in a larger overall economic impact of public procurement expenditures.

C. Conclusion

The G&S Economic Impact Analysis of Palm Beach County prime procurement expenditure revealed that its overall expenditure of \$911,556,484 had the total output, earnings, and jobs impact of \$1,504,805,613, \$452,059,682, and \$7,604, respectively. The overall subcontract expenditure of \$315,255,494 by prime awardees had the total output, earnings, and jobs impact of \$512,289,797, \$132,786,232, and \$2,129, respectively. The economic impact differentials found among some M/WBEs suggest that increasing the representation of M/WBEs among Palm Beach County prime contract and subcontract awardees could enhance the overall economic impact of prime contract expenditures. An impact differential suggests that the M/WBE has a relatively higher economic impact per dollar of prime contract or subcontract award. In this context, reducing any prime contracting and subcontracting disparities between Non-M/WBEs and M/WBEs could result in larger economic impacts for Palm Beach County prime contract expenditures.

Notwithstanding the assumptions governing the G&S Economic Impact Analysis, there is another limitation of this analysis that merits consideration. One cannot claim on the basis of Economic Impact Analysis in the RIMS II framework whether or not a particular expenditure project is unambiguously in the public interest. This follows as a result of RIMS II and similar analytical frameworks not accounting for net project costs and benefits or incorporate social or environmental impacts.¹¹ In particular, the G&S Economic Impact Analysis does not account for important factors such as project-specific costs, tax impacts, and environmental effects, which could significantly influence the overall benefits assessed. In this context, the G&S Economic Impact Analysis is conditional upon these unobserved effects of economic activity being nonexistent and or small relative to the estimated economic impacts.

¹¹ See: Galina Williams, 2020. "Future Potential of Economic Impact Assessment," *Impact Assessment and Project Appraisal*, Vol. 38, No. 4, pp. 272 – 277, Galina Williams, 2016, "Advances and key challenges in Economic Impact Assessment." *Resilience and Sustainability*, Vol. 6, No. 1, pp. 1 – 6.

PALM BEACH COUNTY

Economic Impact Study
Final Report

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