

Best Practices to Prepare for an SBA Surveillance Review

Strategy

- Emphasis placed on small business as the first source of supply for all contract actions.
- A procurement culture that consistently identifies ways for including small, minority, women-owned, HUBZone, and service disabled veteran-owned small businesses.
- Take the approach, “If not small business, why not?”
- Regional Administrator (RA) support of small business should be routinely emphasized by the RA.
- Consider establishing a regional Small Business Program Executive (SPBE) who is independent of PBS and FAS Regional Acquisition Offices, and have them report directly to the Regional Commissioner. The independence allows the SPBE to challenge decisions of the Contracting Officers without repercussion. Typically this role can also be performed by the Regional Small Business Technical Advisor located in the Regional Office of Small Business Utilization (OSBU).

Communication

- Encourage the recording of small business success stories from our networking events and counseling sessions and sharing them regionally and with Central Office’s OSBU.
- Provide a Calendar of Events at all of our networking events to encourage participation in all opportunities.
- Use a template developed for responding via e-mail to businesses requesting assistance in doing business with GSA to ensure consistency.

Networking/Training

- The regional OSBU should meet with the contracting officers at the beginning of each fiscal year and on a quarterly basis to discuss forecasted projects and ensure publication of these forecasts to the Forecast website quarterly.
- Provide relevant training at events to assist contractors in doing business with the government. For example, bring a laptop with mobile internet to events so that small businesses interested in doing business with the federal government can be shown the agencies that have a possible need for what the small businesses are providing.
- Provide relevant training at events to assist contracting officers in doing business with small businesses. Provide individualized training based on the needs of a service area or branch office..
- Partner with the Procurement Technical Assistance Centers (PTACs), SBA, and other small business resource partners to share knowledge through e-mail and training sessions.
- If possible, have the SBA’s Procurement Center Representative for a region be located in the same office as the GSA OSBU staff, and have that person participate in events and training with you.
- Utilize cross-training within the regional OSBU office so that several individuals are aware of how to keep assignments moving even if the primary OSBU POC is unavailable. Cross-training facilitates responsiveness to contracting officers’ and vendors’ concerns.

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Ongoing Goal Achievement Monitoring and Communication

- Have the Regional Acquisition Officer(s), with assistance from the regional OSBU, review and monitor acquisition strategies on a quarterly basis to ensure that contracting opportunities for small business are being considered.
- Coordinate with the regional OSBU to provide regular updates regarding progress against small business goals.

Market Research

- Look in Federal Acquisition Service's Schedule eLibrary for small business schedules available for those services or supplies: <http://www.gsaelibrary.gsa.gov>
- Post Sources Sought Notices in FedBizOpps to identify small businesses capable of performing the work (be sure to follow-up if no response is received), require capability statements, and allow sufficient time based on the complexity of the project: <https://www.fbo.gov>
- Conduct searches in Central Contractor Registration (CCR) for companies with the acquisition-appropriate NAICS code: <https://www.bpn.gov/CCRSearch/Search.aspx>
- Use the SBA's Dynamic Small Business Search (DSBS) site to locate small businesses capable of performing the work and utilize this site for Sources Sought notices by using the small business' e-mails for scope of work distributions: http://dsbs.sba.gov/dsbs/search/dsp_dsbs.cfm
- When in doubt, verify business size using Online Representations and Certifications Application (ORCA): <https://orca.bpn.gov>
- Document results of market research.

Acquisition Planning

- The local SBA Procurement Center Representative and GSA Regional Small Business Technical Advisor should be included in acquisition planning to help ensure small businesses, when appropriate, are included.
- Submit to the local SBA Procurement Center Representative's and GSA Regional Small Business Technical Advisor's for review the following documents for procurements, before a project is advertised:
 - Acquisition plans for any award of \$6 million or more; and
 - GSA Form 2689s for any award that exceeds \$150,000.
- Set aside for task and delivery orders where possible.

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Small Business Set Asides and Preferences

- Provide regional training (or at minimum, Regional Acquisition Officers should send) on a quarterly basis to remind contracting personnel of set aside requirements: 8(a), HUBZone, SDVOSB, WOSB, and small business.
- When set asides are not feasible, consider the inclusion of the socioeconomic category as a non-price evaluation factor.
- For schedules, consider evaluating socio-economic status when making a “best value” determination for award.
- If there is a small business IDIQ, use this contract vehicle, when possible.

Contract Award

- Upon award, correctly code the small business category in FPDS-NG. Remember to indicate in FPDS-NG if an award requires a Subcontracting Plan submission to ensure transfer into the Electronic Subcontracting Reporting System (eSRS).
- Provide notification of award information to the regional OSBU and SBA Area Director, so that subcontracting training can be accomplished when applicable.

Subcontracting

- Provide the contractors needing to prepare plan a Subcontracting Plan Template that already incorporates all of the required FAR/GSAM elements to assist large businesses. Include this Template in the solicitation whenever possible. The most current Templates are available from the Regional SBTA or AAOSBU.
- Notify regional OSBU and the SBA Area Director of award and provide final contract details, including the contract number and final approved subcontracting plan. the SBA Area Director should follow up with contractors and train them on eSRS and reporting requirements.
- Encourage the establishment of aggressive subcontracting goals that exceed minimum goal requirements, where possible.
- Include past performances on subcontracting and planned subcontracting efforts as part of the technical evaluation factors used to select contractors.
- Host networking events to match prime contractors with small businesses prior to issuing a solicitation, when possible.
- Review and accept subcontracting reports in a timely fashion.