

PMR Review Summary & Best Practices

Small Business-related

1. FINDING(S): Items (not all inclusive) found on FAS AND PBS contracts were:

- a. No GSA Form 2689/non-set-aside documentation, or other documentation, with appropriate signatures located in file (GSAM 519.502-70).
- b. Acquisition Plan did not include a discussion of small business participation/set-asides (GSAM 519.202-1)
- c. Opportunities for small business participation could be incorporated into source selection factors (e.g. weight small businesses higher, and/or weight Mentor-Protégé participants higher, in source selection) (GSAM 519.705-2, FAR 19.705-2)
- d. Source Selection Plan(s) did not include source selection factors enhancing small business participation and PNM(s) did not discuss small business participation (GSAM 519-705-2, FAR 19.705-2)
- e. No evidence of review of the subcontracting plan(s) for the prime contractor(s) by the GSA Small Business Technical Advisor (SBTA), SBA Procurement Center Representative (PCR), nor incorporation of the Plan as material part of the contract(s) were found (FAR 19.704, FAR 19.705-2, GSAM 519.705-2, FAR 19.705-4, GSAM 519.705-4, FAR 19.705-5, GSAM 519-705-5, FAR 19.705-6, GSAM 519.705-6, FAR 52.219-9)
- f. Unable to determine if appropriate reports were submitted and reviewed timely into the Electronic Subcontracting Reporting System (eSRS) (FAR 19.705-6, GSAM 519.705-6, FAR 19.705-7, GSAM 519.705-7, FAR 19.706, FAR 52.219-9)
- g. No evidence in prime contractor's contract file on subcontracting plan administration (FAR 19.705-6, GSAM 519.705-6, FAR 19.705-7, GSAM 519.705-7, FAR 19.706, FAR 52.219-9)
- h. No evidence of contract award notice posted in FedBizOpps (nor FPDS-NG) (FAR 5.303)
- i. No evidence of renegotiating subcontracting plan goals for new subcontracting opportunities (FAR 19.702)
- j. No approved subcontracting plan was present in the file or verified by CO it was received and incorporated into the base contract award (FAR 19.702)
- k. No verification evidence that size status of the awardee was verified through CCR, ORCA or other method (Currently SAM.gov). Same applied to modifications (FAR 19.703)

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- I. SBA unable to determine if correct information entered into FPDS-NG (e.g.: socio-economic status, subcontracting plan requirement).

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2. RECOMMENDATION(S):

- a. Respond to the appropriate questions and/or provide support documentation for the files. If documentation was not done, a memo to file must be done to supplement the current stated findings on each contract.
- b. If documentation/memo were accomplished, ensure they are in the appropriate contract file and signed as appropriate.
- c. **ALL Cos need to take a mandatory “Market Research” training class via their local OSBU office.**
- d. Recommend working with SBTA and local SBA in future for ideas to include more small business opportunities, even if in a subcontracting plan.
- e. Future source selection plans should be approved prior to receipt of proposals and consider providing an opportunity for small business participation through weighted source selection factors.
- f. Ensure a copy of the base contract’s subcontracting plan **with** approvals is in the file (use Checklist). If such plan does not exist, the CO must request, receive, approve, and incorporate a subcontracting plan at the order level.
- g. Ensure contract file (if aggregate greater than \$650,000) contains evidence of CO registered in eSRS. All contracts greater than \$650,000 (\$1.5 million for construction), inclusive of Options whether exercised or not must be input into eSRS from the start to finish (even \$0 reports are to be submitted).
- h. **Make mandatory an “Introduction to Subcontracting” training class be taken by ALL COs (to be taught live by the local SBTA or Office of Small Business Utilization’s DC office at the region). The class to include training on how to register in eSRS.**
- i. Recommend placing a copy of the base contract’s subcontracting plan in the task order level file to ensure verification.
- j. Ensure award synopses are posted at www.fbo.gov on future contract awards.
- k. Ensure on future contracts that small business subcontracting goals are re-negotiated when exercising options – ensure incorporation of the new subcontracting opportunities into the contract.
- l. Verify business size in CCR and ORCA (SAM.gov), print record and include in the contract file. Same applies to contract modifications.
- m. Ensure socio-economic and other information contained in FPDS-NG is accurate and complete at award.

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3. BEST PRACTICES:

- a. Historically, when soliciting offers for previous mechanical contracts, no small business vendors submitted. CO took the extra step to conduct market research through FSS which resulted in small business set-aside award. These efforts are commendable and should be continued and shared with colleagues.
- b. **Prior** to award, ensure file contents are complete. Some Cos accomplish through a pre-award checklist. Ensure all documentation is filed prior to award and that the file is complete.
- c. If a CO is receiving an already awarded file, the CO should review the file immediately, try to locate the missing documentation, and, if unable to locate, prepare a "Memo to File" noting the missing documentation.