



Mid-Atlantic Regional Council Jan 2013

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Agenda



- **Subcontract Reporting**
 - **Subcontracting Data Process**
 - **Highlighted Issues**
 - **Incorrectly Submitted Reports**
 - **Status of DoD FY 2012 Reports**
 - **Resources**
- **DoD Regional Councils**
- **DoD Comprehensive Subcontract Plan**



Subcontracting Data Process

- Contract requires Subcontracting Plan
- Contract coded as such in Federal Data Procurement System (FPDS)
- Subcontract Plan includes (among others)
 - Reporting Requirement
 - “Flow-down” requirement for Subcontract Plan to subcontractors



Subcontracting Data Process

- Prime contractors and subcontractors submit reports
- Government reviews prime contractor's reports
- Upper-tier contractor reviews its next lower-tier subcontractor's reports
- Subcontracting data is available for government's use

Highlighted Issues



1. Multiple processes for collecting subcontracting data
 - ISR in eSRS
 - SF 294 for contracts not entered in FPDS (FAR 52.219-9 (Alternate III))
 - Orders under BOAs or BPAs (G/H or A contracts) (Class Deviation - eSRS, 2008-O0008, 12 Feb 09)

Highlighted Issues



2. Different reporting requirements under different Subcontracting Plans
 - ISR/SF 294 only required under Individual Subcontract Plan, not Commercial or DoD CSP
 - SSR required under all 3 type plans

Highlighted Issues



3. Contract must be coded correctly in FPDS in order to submit ISR in eSRS
 - “Subcontract Plan” must be coded “Required”
 - Alert your Contracting Officer to make correction in FDPS

Highlighted Issues



4. SSRs:

(a) submitted under Individual Subcontract Plan encompasses all subcontracting performed in the US under DoD prime contracts and subcontracts, regardless of \$ value

Sources of Subcontracting \$ on SSR

(reported under Individual Subcontract Plan)

**Contracts not
Reported in FPDS**



**When Prime
Contractor**

**Contracts under
Global/Parent
DUNS #**



**When
Subcontractor**



**Contracts w/
Subcontract Plans**

**Indirect
subcontracts**



**Contracts w/o
Subcontract
Plans**

**Contracts - place of performance
outside US, subcontracting
performed in US**



Highlighted Issues



4. SSRs (cont.)

(b) submitted under Commercial Subcontract Plan encompasses all subcontracting performed in the US for entire product line or service as negotiated in the subcontract plan and includes % of total subcontracting dollars attributable to each federal agency

Highlighted Issues



4. SSRs (cont.)

(c) submitted under DoD CSP encompasses all subcontracting under DoD prime contracts and subcontracts; may include subcontracting for departments/agencies and DoD programs, as negotiated under the CSP



Incorrectly Submitted Reports

1. Contractors submitting multiple SSRs (same \$) for DoD, under same DUNS #, same reporting period
2. Contractors submitting SSRs to organization(s) not authorized to acknowledge receipt or accept SSR(s)



Incorrectly Submitted Reports

Submit one SSR (Individual Plan, not construction/maintenance related) for DoD to the department or agency that administers the majority of your plans

- **Most likely DCMA**
- Must be department/agency directly under DoD
- Not DCMA-EAST, NAVAIR, DLA Energy, USACOE, AMC, NAVSUB,



Incorrectly Submitted Reports

Submit separate SSRs (Individual Plan, construction/maintenance related) to each department or agency that awarded such type contracts

- Must be department/agency directly under DoD
- Not DCMA-EAST, NAVAIR, DLA Energy, USACOE, AMC, NAVSUB,



Incorrectly Submitted Reports

3. Contractors submitting SSR under Commercial Subcontract Plan for construction/maintenance type work
Commercial Subcontract Plan is for commercial products, manufacturing, or services; not for commercial construction or renovation of commercial spaces.



Incorrectly Submitted Reports

4. Subcontractors submitting SSR under Commercial Subcontract Plan

To have a Commercial Subcontract Plan a contractor must have a government prime contract with a Commercial Plan. If a contractor does not have a prime contract, then he does not submit an SSR as a subcontractor.



Incorrectly Submitted Reports

5. Contractors submitting an SSR under Commercial Subcontract Plan showing percentages attributable to government agencies that are greater than 50%

The total subcontract \$ cover the entire production of products for the company, of which the government should be a small % of those \$.



Incorrectly Submitted Reports

6. Contractors submitting SSR for the second reporting period with total \$ less than the SSR submitted for the first reporting period.
7. Contractors submitting SSR/ISR with \$0 in socioeconomic categories and no comment or explanation in the “remarks” section.



Status of DoD FY 2012 Reports

	Pending Review	Accepted	Rejected
ISRs – Prime	270	12,784	241
ISRs – Sub	2,260	4,180	246
SSRs – Individual	88	2,502	230
SSRs – Commercial	68	197	29
SSRs – CSP	0	24	0

Resources



- <http://www.acq.osd.mil/osbp/>
Guidance documents posted on OSBP website; choose eSRS in drop-down menu under SB Specialists
 - “Tips for DoD Contractors Submitting Subcontracting Reports (Aug 2012)”
 - “DoD Subcontracting Program: The Basics (Aug 2012)”
- Janice.buffler@osd.mil



DOD REGIONAL COUNCILS



Update

- **DoD Regional Council Website to go “live” April 2013**
 - **Single point for members from to connect virtually**
 - **Conduit for notifications/contacts to assist with implementing your small business programs**



Update

- Develop standards across the councils
- Utilize the Regional Councils to support Mr. Kendall's Defense Acquisition Workforce Improvement Initiative (Sept 11, 2012)
- Utilize Councils to provide training
 - Government Small Business Professionals
 - Industry Small Business Professionals
 - Resource Partners Small Business Professionals



Update

- 2013 Training Plan: OSBP to assist all seven Regional Councils with training
 - **May 20-21**: Annual training session for **all** members, **all** councils in conjunction with DoD Small Business Training Week (May 20-24, Dallas, TX)
 - One training session for each Regional Council
 - One virtual training session for each Regional Council



DOD COMPREHENSIVE SUBCONTRACTING PLAN (CSP) TEST PROGRAM



Plan for the Future

- CSP Test Program authorized through Dec 31, 2014
- Report to Congress the results of test (March 2013)
- Analyzing alternatives to consider as replacements to the CSP
- Developing transition plan
- Reviewing DoD's Subcontracting Program

Questions

