



Office of Small Business Programs

Updates: FY 13 Subcontract Reporting

**DoD Regional Councils
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Agenda

- Policy Changes
- Status of FY 13 SSRs
- Best Practices for Contractors Submitting SSRs and ISRs
- DoD Training and Guidance Documents



Policy Changes

- DoD Class Deviation --- Summary Subcontract Report Submission (2013-O0014), September 9, 2013
- Posted on the Defense Procurement and Acquisition Policy (DPAP)
 - http://www.acq.osd.mil/dpap/dars/class_deviations.html
- Posted on the Homepage after you log on to eSRS



Class Deviation (2013-00014)

FAR 52.219-9(l)(2)(i)(C) and (D), SSRs submitted under an **Individual Subcontract Plan**

- Reduces the frequency of submission of the SSR submitted under an Individual Subcontracting Plan from biannual to annual.
- Eliminates the requirement for multiple SSRs submitted under an Individual Subcontracting Plan for construction and related maintenance and repair contracts, so that only one, consolidated report encompassing all contracts is necessary.



Class Deviation (2013-00014)

DFARS 252.219-7003 (a) and (h)(1)(ii), SSRs submitted under **Individual Subcontract Plan**

- Changes the definition for SSR Coordinator from department/agency to DoD.
- Changes the entity to which the contractor submits the SSR in the Electronic Subcontracting Reporting System (eSRS) for an individual subcontract plan from the DoD department or agency (component) to DoD (9700).



Class Deviation (2013-00014)

DFARS 252.219-7003 (h)(2)

- Removes the requirement for the “Year-End Supplementary Report for Small Disadvantaged Business” and the report for “Small Disadvantaged Participation” as these reports are no longer needed since 10 U.S.C. 2323 has expired.

STATUS OF FY 13 SSRs

(* Includes semiannual reports)

TYPE PLAN	TOTAL	PENDING REVIEW	ACCEPTED	REJECTED
	3,033*	21*	2992*	20*
Individual Plan	2,723*	0	2,722*	1*
Commercial Plan	286	21 (5 DoD)	246 (104 DoD)	19 (17 DoD)
DoD CSP	24	0	24	0

STATUS OF ISRs

(Reporting Period Month/Year – 9/30/2013)

	TOTAL	PENDING REVIEW	ACCEPTED	REJECTED
	10,626	1,371	9,030	229
Prime Contractor	6,781	275	6,384	124
Subcontractor	3,845	1,096	2,646	105



RECOMMENDED BEST PRACTICES FOR DOD CONTRACTORS SUBMITTING SUBCONTRACTING REPORTS



SSR Individual Subcontract Plan

- Reports are due within 30 days after the end of the twelve month report period (NLT Oct 30).
- **Block 2: DUNS #**
This should be the DUNS # of the company submitting the SSR; not the DUNS # of the upper-tier or prime contractor.
- **Block 5: Contact Information** (person submitting report). This person should understand the purpose/intent of the report and know how to submit it completely/correctly.



SSR Individual Subcontract Plan

- **Block 10 – Remarks** (understand its purpose and use)

If you entered (0) zero in socioeconomic categories (SB, SDB, WOSB, HUBZone, SDVOSB), use this section to explain the reason for any shortfalls and your future plans for mitigating this. You may also enter explanations and/or comments you think will be helpful to the Government official who reviews this report.



SSR Individual Subcontract Plan

- **Block 10 – Remarks** (understand its purpose and use)

The government uses information provided in this block to determine your good faith effort in utilizing small businesses,

AKA – annual performance assessment in CPARS (Contractor Performance Assessment Reporting System)

If no reasonable explanation is provided your SSR will be rejected.



SSR Individual Subcontract Plan

- **Block 11** – Contractors Official Who Administers Subcontracting Program. This is the name and contact information (telephone number and email address) for the individual who administers the contractor's Small Business Subcontracting Program.

This should be the SBLO or Supplier Diversity Officer. This is the person we contact with our questions! This is not a government person!



SSR Individual Subcontract Plan

- **Block 15** – Please enter the email address of the Government employee(s) and/or other person(s) to be notified that you have submitted this report.

eSRS sends notification to each address; Federal Government Agency will not be notified unless you enter an address.

Who do you want to know that you are compliant with reporting requirement of your subcontracting plan?



SSR Commercial Subcontract Plan

- Reports are due within 30 days after the end of the government's fiscal year **(NLT Oct 30)**.
- **Block 1 – Type of Plan:** SSR for Commercial Subcontract Plan is for commercial product line or service; not construction of commercial space or real estate.

Construction related contractors should select “Individual” not Commercial.



SSR Commercial Subcontract Plan

- **Block 2 – DUNS #**

This should be the DUNS # of the company submitting the SSR; not the DUNS # of the upper-tier or prime contractor.

- **Block 5 – Contact Information (person submitting report).** This person should understand the purpose/intent of the report and know how to submit it completely and correctly.



SSR Commercial Subcontract Plan

- **Block 10** – Specify agencies to which you are submitting this report and percentages of dollars attributable to each. The % entered here represents the % of subcontracting attributable to each federal government agency.

NOTE: You may not enter 100% attributable in total or to any particular government agency. Anything greater than 50% is questionable.



SSR Commercial Subcontract Plan

- **Block 10** – Specify agency that approved your Commercial Subcontract Plan.

For DoD, select the contracting organization under the department or agency that approved your commercial subcontract plan by “drilling down” through several breakout menus.



SSR Commercial Subcontract Plan

- **Block 11 – Remarks** (understand its purpose and use)

If you entered (0) zero in socioeconomic categories (SB, SDB, WOSB, HUBZone, SDVOSB) or failed to meet the dollar or percentage goals in your Commercial Subcontracting Plan, use this section to explain the reason for any shortfalls and your future plans for mitigating this. You may also enter explanations and/or comments you think will be helpful to the Government official who reviews this report.



SSR Commercial Subcontract Plan

- **Block 11 – Remarks** (understand its purpose and use) The government uses information provided in this block to determine your good faith effort in utilizing small businesses, **AKA – annual performance assessment in CPARS (Contractor Performance Assessment Reporting System).**
If no reasonable explanation is provided your SSR will be rejected.



SSR Commercial Subcontract Plan

- **Block 12** – Contractors Official Who Administers Subcontracting Program. This is the name and contact information (telephone number and email address) for the individual who administers the contractor's Small Business Subcontracting Program.

This should be the SBLO or Supplier Diversity Officer. This is the person we contact with our questions! This is not a government person!



SSR Commercial Subcontract Plan

- **Block 15:** Please enter the email address of the Government employee(s) and/or other person(s) to be notified that you have submitted this report. eSRS sends notification to each address; Federal Government Agency will not be notified unless you enter an address.

Who do you want to know that you are compliant with reporting requirement of your subcontracting plan? NOTE: Include contracting officer who approved your commercial subcontract plan.



Individual Subcontract Report (ISR)

- **Block – (the block number varies)** Contact Information (person submitting report).

This person should understand the purpose/intent of the report and know how to submit it completely and correctly.



Individual Subcontract Report (ISR)

- **Be mindful of the following scenario:**

Block – (the block number varies) Is your contract administered by an office other than the Contracting Office that awarded the contract?

Contractor answers “yes” and selects the administering office from breakout menus.

Block 4 – Agency Awarding Contract (second section of ISR). This data is “pulled” from contract information in FPDS.

When both show DCMA, the awarding office (PCO) cannot see or take action on the ISR. We are working with GSA to resolve. PCO is responsible for ISR. Alert your PCO and ACO.



Individual Subcontract Report (ISR)

■ Subcontract Awards Section – “Actual Cumulative” section

Note “Percentage of Current Contract Value” column is never correct for IDIQ type contracts. FPDS and eSRS do not calculate \$ and % correctly for “D” contracts. We are working with GSA to resolve.



Individual Subcontract Report (ISR)

- **Block 13 – Remarks** (understand the purpose and use of this section)

If you entered (0) zero in socioeconomic categories (SB, SDB, WOSB, HUBZone, SDVOSB), use this section to explain the reason for any shortfalls and your future plans for mitigating this. You may also enter explanations and/or comments you think will be helpful to the Government official who reviews this report.



Individual Subcontract Report (ISR)

- **Block 13 – Remarks** (understand the purpose and use of this section)

The government uses information provided in this block to determine your good faith effort in utilizing small businesses,

AKA – annual performance assessment in CPARS (Contractor Performance Assessment Reporting System)

If no reasonable explanation is provided your ISR will be rejected.



Individual Subcontract Report (ISR)

- **Block 14 – Contractor's Subcontracting Plan Administrator**

This is the name and contact information of the Contractor's employee who is responsible for ensuring the contractor's compliance with its subcontracting plan.

This should be the SBLO or Supplier Diversity Officer. This is the person we contact with our questions! This is not a government person!



Individual Subcontract Report (ISR)

- **Block 15:** Please enter the email address of the Government employee(s) and/or other person(s) to be notified that you have submitted this report.

eSRS sends notification to each address; Federal Government Agency will not be notified unless you enter an address.

Who do you want to know that you are compliant with reporting requirement of your subcontracting plan?



Training

- Updated training and guidance documents are posted on DoD OSBP website

<http://www.acq.osd.mil/osbp/sbs/esrs.shtml>