DoD eSRS Training: April 2010

Agenda

• Background
• Types of Reports Submitted in eSRS
• DoD Policy and Responsibilities
• Assessing Agency Performance in Subcontracting
• Assessing Contractor Performance
• Status of FY 2009 Subcontracting Reports
• DoD Issues and Lessons Learned
• Reviewing Reports
• Running Data Reports
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Background

• FAR eSRS Interim Rule published April 2008 (requires eSRS reporting)
• April 2008 DoD began phased approach in deployment
• DUSD (A&T) Memo, July 19, 2008 – full implementation of eSRS in Oct 2008 by all DoD components who use FPDS for contract reporting
Individual Subcontracting Report (ISR)

- Required for each contract containing an Individual Subcontracting plan
- Required semiannually from a prime contractor and its lower tier subcontractors with Individual Subcontracting Plans
- Not required for Commercial Subcontracting Plan or DoD Comprehensive Subcontracting Plan (CSP)
Individual Subcontracting Report (ISR)

• Required from each prime contractor or subcontractor with at least 1 contract that supports DoD and includes an Individual Subcontracting Plan

• DoD prime contractor or subcontractor submits one SSR semiannually based on government fiscal year to:
  • Department/Agency that administers majority of subcontracting plans or
  • Each Department/Agency that awards construction and related maintenance and repair contracts
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Summary Subcontract Report (SSR) for Individual Subcontracting Plan

• Includes the following:
  • All subcontracting $ associated with all individual contracts (with or without subcontracting plan)
  • All other subcontracting (Purchase Orders, Task Orders, Basic Ordering Agreements, Blanket Purchase Orders, classified contracts)
  • All direct and indirect costs associated with subcontracting
  • All subcontracting $ (as prime contractor and subcontractor)
  • All subcontracting $ performed within US and territories, even when primary place of performance on prime contract is outside the US and territories
Summary Subcontract Report (SSR) for Commercial Plan

• Required from each prime contractor with a Commercial Subcontracting plan that applies to entire production of commercial items sold by either the entire company or a division, plant or product line

• Includes all subcontracting under federal government contracts and non-government contracts

• Identifies % of total subcontracting $ attributable to each federal agency that awarded contracts using the Commercial Subcontracting Plan

• Submitted annually to Contracting Officer who approved the plan
Summary Subcontract Report (SSR) for DoD Comprehensive Subcontract Plan (CSP)

• Required from 14 participating companies
• Subcontracting $ are on Plant/Corporate/Division basis (based on negotiated subcontracting plan)
• Includes total subcontracting $ for DoD contracts
• May also break out total subcontracting $ for
  • Department/Agency
  • Major Programs
• Submitted to DCMA CSP Division
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Year-End Supplementary Report for SDBs

• Submitted with accompanying SSR at the close of each FY
  • If data is not available when submitting SSR, prime contractor or subcontractor shall submit w/in 90 days of submitting the SSR
• Includes total subcontract $ to SDBs by NAICS
SDB Participation Report

• Required if contract award included SDB participation evaluation or if SDB targets are in the contract

• Required at contract completion or as otherwise required in the contract

• Use of eSRS to submit this report is optional
  • Can also submit Optional Form 312 or
  • Submit in contractor’s own format
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DoD Policy and Responsibilities

• Deviation to FAR/DFARS February 12, 2009, for certain eSRS reports:
  • eSRS does not support ISRs for contracts that through other authority are not required to be reported to FPDS
  • eSRS does not support ISRs for orders against Basic Ordering Agreements (BOA) and Blanket Purchase Agreements (BPA)
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DoD Policy and Responsibilities

• eSRS FAR Case
  • Finalized (by the time of this training) ???

• DFARS Case
  • Approved by DAR Council on 31 March 2010
  • Interim Rule Published ???
    – Review/provide comments more clarity if needed ???
    – Provide copy of current language ???
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DoD Policy and Responsibilities

• DFARS Case (cont)
  • Provides contractor instruction how to submit SSRs for DoD
  • Provides guidance on parties responsible for acknowledging receipt/rejecting the SSR
  • Provides guidance on Comprehensive Subcontracting Plan SSRs

• Deviation
  • Will be amended to remove contracts that through other authority are not required to be reported to FPDS
  • BOA/BPA requirements are still needed
DoD Policies and Responsibilities

• Deviate from FAR by using FAR 52.219-9, Small Business Subcontracting Plan (DEVIATION) to allow for SF 294s when eSRS does not support these contracts

• Deviate from the DFARS to implement eSRS by using:
  • 252.219-7003, Small Business Subcontracting Plan (DoD Contracts) (DEVIATION)
  • 252.219-7004, Small Business Subcontracting Plan (Test Program) (DoD Contracts) (DEVIATION)
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<table>
<thead>
<tr>
<th><em>FAR/DFARS clauses for eSRS Reporting</em></th>
<th>eSRS Reporting required</th>
<th>DoD Class Dev. Feb 12, 2009 Applies</th>
<th><strong>DoD Comprehensive Subcontr. Plan used</strong></th>
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<tr>
<td>FAR 52.219-9 (April 2008)</td>
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<tr>
<td>FAR 52.219-9 (DEVIATION)</td>
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<td>DFARS 252.219-7003 (DEVIATION)</td>
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<tr>
<td>DFARS 252.219-7003 (DEVIATION) –Alternate I</td>
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<td>FAR 52.219-25 (APRIL 2008)</td>
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</table>

*For commercial items use FAR 52.212-5 (Apr 2008) and check these clauses

**CSP Participants began using eSRS in Apr 2008
DoD Policy and Responsibilities

- ISRs submitted by Prime Contractor
  - PCO or ACO, as required by DFARS 252.219-7003 (DEV), is responsible for acknowledging/rejecting
  - DCMA, if ACO, monitors subcontracting plans using ISRs in eSRS
- ISRs submitted by the Subcontractor
  - Entity awarding the subcontract is responsible for acknowledging/rejecting the ISR submitted by next lower-tier subcontractor
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DoD Policy and Responsibilities

• DoD Contractor must submit one SSR (for Individual Subcontracting Plan) semiannually to

  • Department/Agency that administers majority of subcontracting plans or

  • Each department-agency (Level 2 in DoD hierarchy) that awards construction and related maintenance and repair contracts
DoD Policy and Responsibilities

• SSR Coordinator(s) for each agency acknowledges/rejects SSRs IAW DFARS 252.219-7003 (DEV), except for

  • SSRs for Commercial Subcontracting Plans which must be acknowledged/rejected by the Contracting Officer who approved the plan; and

  • SSRs for DoD CSP which must be acknowledged/rejected by the DCMA CSP Division
DoD Policy and Responsibilities

• USD (AT&L) memo dated April 16, 2009
  • Establishes timelines for acknowledging all reports in eSRS
  • Requires each DoD component to submit an eSRS Status Report to DPAP, OSBP and BTA
  • Includes # outstanding reports, completion plans including a timeline, and barriers to completion
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DoD Policy and Responsibilities

• Timeline for eSRS Reports
  • IAW clause
    – Contractor must submit ISR/SSR within 30 days after end of reporting period
      » April 30 and October 30 each year
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DoD Policy and Responsibilities

• Timeline for eSRS Reports
  • IAW AT&L policy
    – Contracting Officials (COs, ACOs and SSR Coordinators) must acknowledge reports
      » NLT June 15 and December 15 for reports submitted by April 30 and October 30
      » Within 30 days for all reports submitted after due date
    – Agency eSRS Status Report due June 30 and December 30
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DoD Policy and Responsibilities

• Proposed schedule for review of SSRs
  • May 1-15 (Nov 1-15):
    – DPAP/OSBP review, identify and reject
      » All reports submitted for same DUNS # with duplicate and multiple reports
      » All reports submitted to incorrect level within the DoD department/agency
DoD Policy and Responsibilities

• Proposed schedule for review of SSR
  • May 16 – June 15 (Nov. 16 – Dec 15)
    – Contracting Officials (COs not ACOs) who approved Commercial Subcontracting Plan acknowledge receipt/reject SSRs for Commercial Subcontracting Plan
    – Agency SSR Coordinators (Level 2 in DoD Hierarchy identified by the contractor as administering the majority of subcontracting plans) acknowledge SSRs for Individual Subcontracting Plan
Assessing Agency Performance

- SBA uses SSR data to report achievements to Congress
- OSBP monitors achievement of goals, reports to DoD HQ management and provides input for the SBA Scorecard (SSR data)
- OSBP will establish goals and monitor achievements for individual DoD components when 2 complete Fiscal Years of data are collected in eSRS (ISR data)
Assessing Contractor Performance

- CPARS is the DoD system used to assess contractor performance IAW FAR 42.15
- SB Utilization added to CPARS Feb 2009
- CPARS SB Utilization assessment data will feed into PPIRS
- eSRS reports are used in assessing SB Utilization in CPARS (PPIRS)
Assessing Contractor Performance

• “Flow-down requirements” – large prime contractors and subcontractors at lower tiers with subcontracting plans must at a minimum:
  • Ensure eSRS reporting is completed for their subcontractors
  • Compare performance of their subcontractors to subcontracting plan goals
  • Discuss performance with subcontractors to ensure they are making a good faith effort to comply with their subcontracting plans and implement a corrective action plan as needed
### Status of Subcontracting Reports
#### FY 2009 (Oct – Sept)

<table>
<thead>
<tr>
<th>Reports</th>
<th>Accepted</th>
<th>Pending / Revised</th>
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<tbody>
<tr>
<td></td>
<td>Total</td>
<td>Prime</td>
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<tr>
<td>ISRs</td>
<td>4,163</td>
<td>3,765</td>
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<tr>
<td>SSRs</td>
<td>1,594</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Year-End</td>
<td>627</td>
<td>--</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Non-DoD SSRs pending appearing on eSRS generated list where some portion of the dollars on a commercial plan are for DoD, but another federal agency is the approver.

As of February 1, 2010
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DoD Issues and Lessons Learned

• Paper reporting of the past did not match eSRS
  • Inconsistent monitoring practices
  • Task/Delivery order contracts with one subcontracting plan and SF 294 per order
    • Link to performance assessments not effectively made
• Still learning how management reports work (not as we expected)
• Must be registered @ DoD 9700 level in order to see ISRs submitted on contracts awarded by other departments/agencies
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DoD Issues and Lessons Learned

• Contractors submitting SSRs for a Commercial Subcontracting Plan selects the contracting office approving his plan from the DoD hierarchy
  • CO must be registered at that level in order to “see” and review the report

• DCMA does not approve Commercial Subcontract Plans; therefore cannot acknowledge receipt or reject SSR for a Commercial Plan
DoD Issues and Lessons Learned

• In eSRS the “Reporting Period” field, on the SSR for a Commercial Subcontracting Plan, is a text field. As a result, we must be mindful of this difference when running data reports. Recommend that contractor use standard format (Oct – Sept)

• Not all SSRs have accompanying Year-End Small Disadvantaged Business Reports. Be cognizant and advise contractors to submit.
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DoD Issues and Lessons Learned

• Department of Navy and DCMA are delegating authority to acknowledge receipt/reject SSRs (Individual Subcontracting Plans) to SSR Coordinators below Level 2 in the DoD hierarchy.
  • Contractor submits SSRs and identifies the DoD department/agency (Level 2 within hierarchy) which administers the majority of his subcontracting plans
  • All SSR coordinators must be registered at Level 2 in order to acknowledge receipt/reject SSRs
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DoD Issues and Lessons Learned: Hierarchy Overview

• Organizational hierarchy components
  • Department, Service/Agency, Major Command, Sub Command

• Agency codes
  • 4 digit (DoD 9700, Army 2100, Navy 1700, DISA 97AK)

• Office Codes
  • 6 character DoD Activity Address Code (DoDAAC) equals office code in eSRS
  • Before 2003, DoD used 4 digit codes
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### DoD Issues and Lessons Learned: Hierarchy Example

<table>
<thead>
<tr>
<th>FPDS</th>
<th>eSRS</th>
<th>DoD name</th>
<th>Org code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Department</td>
<td>Level 1</td>
<td>DoD</td>
<td>9700</td>
</tr>
<tr>
<td>Agency</td>
<td>Level 2</td>
<td>Navy (Army)</td>
<td>1700 (2100)</td>
</tr>
<tr>
<td>Major Command</td>
<td>Level 3</td>
<td>Navfac (AMC)</td>
<td>Navfac (AMC)</td>
</tr>
<tr>
<td>Subcommand level 1</td>
<td>Level 4</td>
<td>Navfac Atlantic (ACC)</td>
<td>NAVFAC Atlantic (ACC)</td>
</tr>
<tr>
<td>Subcommand level 2</td>
<td>Level 5</td>
<td>Navfac Washington (MICC)</td>
<td>Navfac Washington (MICC)</td>
</tr>
<tr>
<td>Subcommand 3</td>
<td>Level 6</td>
<td>----- (Ft. Belvoir)</td>
<td>-------- (Ft. Belvoir)</td>
</tr>
</tbody>
</table>
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FPDS Hierarchy Sample
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eSRS Hierarchy Sample
### DoD Issues and Lessons Learned:

**Level 2 DoD Departments/Agencies Are Responsible for Acknowledging/Rejecting SSRs for Individual Subcontract Plan**

<table>
<thead>
<tr>
<th>Business Transformation Agency (8777)</th>
<th>Defense Information System Agency (97AK)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Defense Advanced Research Projects Agency (97AE)</td>
<td>Defense Logistics Agency (97AS)</td>
</tr>
<tr>
<td>Defense Commissary Agency (97AZ)</td>
<td>Defense Media Center (97F1)</td>
</tr>
<tr>
<td>Defense Contract Management Agency (9763A/9763B)</td>
<td>Defense Micro Electronics Activity (97AT)</td>
</tr>
<tr>
<td>Defense Finance and Accounting Service (97BZ)</td>
<td>Defense Security Cooperation Agency (97AT)</td>
</tr>
<tr>
<td>Defense Human Resources Activity (9748)</td>
<td>Defense Security Service (97AV)</td>
</tr>
</tbody>
</table>
### DoD Issues and Lessons Learned:
Level 2 DoD Departments/Agencies Are Responsible for Acknowledging/Rejecting SSRs for Individual Subcontract Plan

<table>
<thead>
<tr>
<th>Department/Agency</th>
<th>Responsibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Defense Threat Reduction Agency (9761)</td>
<td>TRICARE Management Agency (9760)</td>
</tr>
<tr>
<td>Department of Defense Education Activity (97F2)</td>
<td>United States Special Operations Command (97ZS)</td>
</tr>
<tr>
<td>Department of the Air Force (5700)</td>
<td>United States Transportation Command (9776)</td>
</tr>
<tr>
<td>Department of the Army (2100)</td>
<td>Uniformed Services University of the Health Sciences (97HW)</td>
</tr>
<tr>
<td>Department of Navy (1700)</td>
<td>Washington Headquarters Services (97F5)</td>
</tr>
<tr>
<td>Missile Defense Agency (97JC)</td>
<td>DIA and NGA (exempt, not in hierarchy)</td>
</tr>
</tbody>
</table>
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DoD Issues and Lessons Learned

• Some sub agencies and subcommands have been requiring contractors to submit an SSR for contracts awarded by their sub agency.

• Note: IAW DFARS Contractors submit SSRs (for Individual Subcontract Plan) in eSRS to
  • Department/Agency (Level 2) which administers the majority of subcontracting plans or
  • To the Department/Agency (Level 2) awarding construction and related maintenance repair contracts

• Examples:
  Submit SSR to Army not USACE
  Submit SSR to NAVY not NAVFAC or NAVAIR
  Submit SSR to DCMA not DCMA Contracting East or DCMA CE-Atlanta

• In order to “see” reports sub agencies and subcommands must be registered in eSRS at Department/Agency (Level 2) in DoD hierarchy; however, data will include all DoD subcontracting $
Reviewing Reports: ISRs (ACO)

- Always provide explanation when rejecting the ISR so the contractor knows what to do
- **Not** meeting goals is **not** a reason for rejecting ISR
- Contractor should have no pending lower-tier ISRs
- $ in subsequent reports usually ≥ previous report
- Reject ISR when:
  - Incorrect Contract Administering Office
  - Incorrect reporting period/year
  - Incorrect type of report (regular/final)
  - Not same as negotiated Subcontracting Plan
  - Not certified by contractor
  - No comment provided when contractor enters zero or fails to meet $ or % goals
  - Name of Subcontracting Plan Administrator not provided
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Reviewing Reports: SSRs for Individual Subcontracting Plan (SSR Agency Coordinator)

• 2\textsuperscript{nd} reporting period $ \geq 1\textsuperscript{st} reporting period $

• Should have accompanying Year-End SDB Report (within 90 days after filing SSR)

• Reject SSR when:
  • Incorrect reporting period
  • No comment provided when contractor enters zero $ or \% for subcontracting achievements
  • Not contractor certification
  • Not CEO approval
Reviewing Reports:
SSRs for Commercial Plans (PCO)

- Should have accompanying Year-End SDB Report (within 90 days after filing SSR)
- Reject SSR when:
  - Incorrect reporting period (should be Oct – Sep)
  - Contractor submits report as “subcontractor”
  - Contractor’s NAICS is construction (NAICS 23xxxx)
  - Subcontract award $ exclusively from federal government contracts
  - 100% attributable to all federal government/single government agency/or any combination thereof
  - Submitted to PCO/ACO who did not approve the plan
  - No comment provided when contractor enters zero or fails to meet $ or % goals
Reviewing Reports: Demo

• Show actual reports
• Use Checklist to review reports
Running Reports: Demo

- How to use ISR data
- Pending Reports (explain the differences in numbers from different screens)
- Running Standard and Ad Hoc Data Reports
Summary

• Use info to train your agencies
• Ensure your agency is following DoD policy and regulations
• Distribute and use checklists and fact sheets provided during this training session
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Resources

• eSRS
  • https://esrs.symplicity.com/help_desk links to new Federal Service Desk
  https://www.fsd.gov

• DAU
  • https://acc.dau.mil/smallbusiness
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