

## Small Business Subcontracting Plan

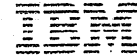
### Introduction

Development of an effective Small Business Subcontracting Plan for this program has been a challenge. The solution calls for unique capabilities that leverage economies of scale associated with high volume activity in coupon distribution, coupon redemptions and call center operation. IBM has engaged substantive and experienced business organizations to deliver robust operational services around these high volume processes. We feel that one of the strengths of the IBM solution is having single entities responsible for each major component of the solution. In our view, this reduces risk and makes for clear division of responsibility. This model, however, does not provide many opportunities for small businesses to subcontract directly to IBM, the prime contractor.

IBM does understand that the previously submitted Small Business Subcontracting Plan did not provide the desired level of participation from small business. In this submission, we have developed a revised plan that identifies a 10% goal of total subcontracted revenue to small business concerns. In addition, the plan has participation from all the required socioeconomic categories. Under this revised plan, we are planning to outsource specific job roles within IBM's own scope to small businesses that have provided similar skills to IBM in previous government contracts. In addition, a subset of the call center staff previously sourced through Epiq and CLC would be provided through small business subcontractors hired and managed directly by IBM. While we think the original tiered subcontracting approach is the best way to minimize program risk, we fully understand that second tier subcontractors do not qualify within the contract's current plan for including only first-tier subcontractors.

While IBM is confident that the subcontractors identified within the Plan can provide the identified skills at the rates/prices defined within the business volume, we have not had adequate time to finalize commitments to scope from these companies. The contractual commitments will be finalized after contract award, if IBM is awarded the contract. However, we stand behind the pricing and the goals presented here.

This revised plan was not entered into lightly. While this revised plan increases direct small business participation significantly, it also introduces some additional program risk. IBM looks forward to reviewing the goals outlined in the proposed Small Business Subcontracting Plan upon award, and discussing the trade-offs associated with implementing this revised Plan.



## Small Business Subcontracting Plan

Company Name: IBM Business Consulting Services – Public Sector  
Address: 6710 Rockledge Drive, Bethesda, MD 20817  
Date Prepared: 07/02/2007  
Solicitation: DG1335-07-RP-0050  
Item/Service: HW, SW, Consulting and/or Technical Services  
Place of Performance: Primarily DC

### Type of Plan

- INDIVIDUAL PLAN:** This plan covers the entire contract period (including option periods), applies to a specific contract, and has goals that are based on the offer's planned subcontracting in support of this contract, except that indirect costs incurred for common or joint purposes may be allocated on a prorated basis to the contract.
- COMMERCIAL PLAN:** a subcontracting plan (including goals) that covers the offeror's fiscal year and that applies to the entire production of commercial items sold by either the entire company or a portion thereof (e.g., division, plant, or product).
- MASTER PLAN:** a subcontracting plan that contains all the required elements of an individual contract plan, except goals, and may be incorporated into individual contract plans, provided the master plan has been approved.

### Small Business Goals and Dollars (FAR 19.704(a)(1), FAR 52.219-9(d)(1))

Pursuant to FAR 19.704(a)(1)(2) and FAR 52.219-9(d)(1) IBM Business Consulting Services commits to the dollar and percentage mandatory requirements described below for using small businesses as subcontractors in support of the contract. The following represents separate percentage goals and total dollars planned to be subcontracted to small business, small disadvantage business, women-owned small business, HUBZone small business, veteran-owned small business, and service-disabled veteran-owned small business concerns.

Our commitment to small business, totaling 10% of the overall estimated subcontracting dollar value, is meaningful, substantial and verifiable.

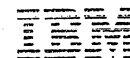
### Subcontracting Dollar and Percentage Goals:

BASE PERIOD 08/15/07-09/30/08*	Dollars	Percent Total Dollars
Estimated Subcontracting	\$70,061,770	100.0%
Awards to Small Business (SB)	\$7,022,201	10.02%
Awards to Small Disadvantaged Business (SDB)	\$331,946	0.47%
Awards to Women Owned Small Business (WOSB)	\$4,500,945	6.42%
Awards to HUBZone Owned Small Business (HUBZ)	\$168,999	0.24%
Awards to Veteran Owned Small Business (VOSB)	\$188,567	0.27%
Awards to Service-Disabled VOSB (SD-VOSB)	\$188,567	0.27%

\* The total subcontracting amount is the scope associated with Phases One, Two and Four at the full 22,250,000 coupon distribution / redemption level.

### PRINCIPAL SERVICES TO BE SUBCONTRACTED (FAR 19.704(A)(3),(FAR 52.219-9 (D)(3))

A description of the principal types of supplies and services to be subcontracted and an identification of types planned for subcontracting to small business, small disadvantage business, women-owned small business, HUBZone small business, veteran-owned small business, and service-disabled veteran-owned small business concerns are listed below.



**Table 1. IBM Small Business Subcontractors**

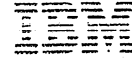
Subcontracting Team	Key Skills	Type of Business to be Utilized (Check Block)						
		Large Bus.	Small	SDB	WOSB	HZ	VOSB	SD- VOSB
The Arnold Group	Retail Call Center Staff	( )	( X )	( )	( )	( )	( )	( )
The Aspen Group	Project Management Office Administration	( )	( X )	( X )	( X )	( )	( )	( )
Cognos Corporation	Software	( X )	( )	( )	( )	( )	( )	( )
Collins Consulting, Inc	Database Developer/Analysts and Testing	( )	( X )	( )	( )	( )	( X )	( X )
Corporate Lodging Consultants, Inc (CLC)	Retailer education, retailer certification, and retailer coupon redemption and payment support	( X )	( )	( )	( )	( )	( )	( )
Federal Working Group, Inc (FWG)	Security Certification & Accreditation	( )	( X )	( )	( )	( )	( )	( )
Ketchum Inc	Consumer education	( X )	( )	( )	( )	( )	( )	( )
Poorman-Douglas Corporation (PD)	Coupon distribution and consumer support	( X )	( )	( )	( )	( )	( )	( )
ServerVault Corporation	Hosting & Equipment Lease	( X )	( )	( )	( )	( )	( )	( )
VICCS, Inc	Systems Administration, Project Management Office Administration	( )	( X )	( )	( X )	( X )	( )	( )
Vocis Solutions, Inc	Consumer Call Center Staff	( )	( X )	( )	( X )	( )	( )	( )

**METHOD USED TO DEVELOP SUBCONTRACTING GOALS (FAR 19.704(A)(4) (FAR 52.219-9 (D)(4))**

The following methods are used in developing subcontract goals:

The first step in determining small business subcontracting goals was to identify the products and services that IBM Business Consulting Services– Federal would procure from subcontractors. IBM is dedicated to meeting and/or exceeding the goals set forth herein and has established a program for increasing small business utilization. IBM maintains an extensive supplier database, which permits identification of those suppliers with the best capability to meet the specifications and goals set forth. IBM Business Consulting Services maximizes every opportunity to use small, small disadvantage business, women-owned small business, HUBZone small business, veteran-owned small business, and service-disabled veteran-owned small businesses and has numerous subcontractors within its database that have a proven track record for providing consistent, reliable, and competitively-priced products and services.

Next, source lists of those businesses that historically offer best service and price performance was developed. New sources were qualified based upon capability information and references. The competitive requirements in subcontracting were properly executed as buyers submitted RFPs (Requests for Proposal) to appropriate suppliers. Procurement activity with a value of \$100K or less is reserved for small businesses; however, small businesses were considered, where appropriate, for all procurement



activity. Evaluation of the suppliers RFPs was conducted. The result of the bid evaluations and negotiations was the subcontracting team list. A financial analysis of the subcontractor's proposal, the product or service to be procured, projected quantity, subcontractor's business size and total subcontracting opportunity allowed goal determination. While performance to small business subcontracting goals could be affected, IBM will continue to make every effort to source to small businesses wherever possible.

**Method Used to Identify Potential Sources for Solicitation Purposes (FAR 19.04(a)(5),(FAR 52.219-9(d)(5))**

- IBM Business Consulting Services used a very thorough methodology in developing our roster of small business suppliers. For technical services suppliers IBM has competed and has awarded multiple National CORE Suppliers contracts which meet the Government requirements for Small Business concerns (includes representation in each of the designations) to support a portion of the business in this commodity. Additionally, IBM has and will continue to rely heavily on the CCR/PRO-Net database in order to research the marketplace for minority-owned suppliers. Additionally, IBM will continue to support trade fairs, and other similar events where the benefits of networking can not be overstated.

**A STATEMENT REGARDING INDIRECT COSTS (FAR 19.704(A)(6), (FAR 52.219-9(D)(6))**

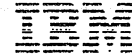
Indirect and overhead costs have not been included in the dollar and percentage goals specified above. Because this proposal is being bid under IBM Business Consulting Services, the overhead and indirect cost base consist only of occupancy, utilities; equipment depreciation, etc. Subcontracting decisions for these types of indirect services are handled by the Corporate General Procurement organization and are included in IBM's General Procurement organization's reporting. IBM Business Consulting Services does not procure these specific items and therefore, they are not included in this program specific plan.

**SMALL BUSINESS ADMINISTRATOR (FAR 19.704(A)(7) (FAR 52.219-9(D)(7))**

Pursuant to FAR 19.704(a)(7) the name, title, address, phone number, position within the corporate structure and the duties of the company employee who will administer the small business subcontracting program follows:

Name: Peter Clarke  
Title: Small Business Liaison Officer/Administrator  
Address: IBM, Route 100, Somers, New York 10589-0100  
Telephone: (914) 766-2217  
E-mail: pclarke@us.ibm.com  
Position: Mr. Clarke reports directly to the IBM Corporate Supplier Diversity Program Manager, Mr. Michael K. Robinson.  
Duties: Mr. Clarke has overall responsibility for the small business subcontracting program within IBM Business Consulting Services– Federal. Specifically, he develops, prepares, and executes individual subcontracting plans and monitors their performance. Additional duties include the following activities:

- A. Developing and promoting company/division policy statements that demonstrate the company's/division's support for awarding contracts and subcontracts to small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small businesses.
- B. Developing and maintaining bidder's lists of small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business firms from all possible sources.
- C. Rotating potential subcontractors on bidders' lists.
- D. Including small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small businesses on the bidder's list for every subcontract solicitation for products and services they are capable of providing.



- E. Designing procurement "packages" to permit the maximum possible participation of small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small businesses.
- F. Reviewing subcontract solicitations to remove statements, clauses, etc., which might tend to restrict or prohibit small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business participation.
- G. Requiring that the subcontract bid proposal review board documents its reasons for not selecting any low bids submitted by small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business firms.
- H. Overseeing the establishment and maintenance of contract and subcontract award records.
- I. Attending or arranging for the attendance of company counselors at Business Opportunity Workshops, Minority Business Enterprise Seminars, Trade Fairs, etc.
- J. Directly or indirectly counseling small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business firms on subcontracting opportunities and how to prepare responsive bids to the company.
- K. Providing notice to subcontractors concerning penalties for misrepresentations of business status as small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business for the purpose of obtaining a subcontract that is to be included as part of a requirement contained in the contractor's subcontracting plan.
- L. Conducting or arranging training for purchasing personnel regarding the intent and impact of Public Law 95-907 on purchasing procedures.
- M. Developing and maintaining an incentive program for buyers that supports the subcontracting program.
- N. Monitoring the company's performance and making any adjustments necessary to achieve the subcontract plan requirements.
- O. Preparing and submitting reports in a timely manner.
- P. Coordinating the company's activities during compliance reviews by Federal agencies.

**EQUITABLE OPPORTUNITY TO COMPETE (FAR 19.704(A)(8), (FAR 52.219-9(D)(8))**

In order to provide equitable opportunity to compete, IBM Business Consulting Services will use the following efforts to obtain small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantage business, and women-owned small business concerns for subcontracts as follows:

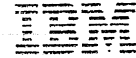
**A. Outreach efforts to obtain sources include:**

Contacts with minority and small business trade associations, such as:

1. Federal Small Business Technology Council, Inc. (FSBTC)/Annapolis Junction, MD
2. Small Minority and Women Owned Business, Shared Interest Group (SMW SIG)/McLean, VA
3. Small and Disadvantaged Business Opportunity Council, Denver, CO
4. SBA/Veteran Administration Outreach Conference, Denver CO

Contacts with business development organizations, such as:

1. Small Business Administration
2. 8 (a) and Small and Disadvantaged Business Association
3. National Women Owned Small Business Council
4. Regional Small Business Liaison Officers
5. Chamber of Commerce Small Business Support Council
6. National Minority Supplier Development Council (NMSDC)
7. DoD, DCMA, SBLO Training, Colorado Springs, CO
8. South Central Regional Council for Small Business Education & Advocacy, Salt Lake City, UT



Attendance at small and minority business procurement conference and trade fairs, such as:

1. Department of the Treasury's Prime Contractor Outreach Session, Oxon Hill, MD
2. U.S. Department of Agriculture's Office of Small Disadvantaged Business Utilization "Federal Subcontracting Forum, Workshop, and Opportunities Fair," Washington, DC
3. SBA's "Procurement Conference Business Opportunity Expo and Awards Presentation," Washington, DC
4. FSBTC's OSDBU Procurement Conference, Upper Marlboro, MD
5. Rocky Mountain Small and Disadvantaged Business Opportunity Council (SADBOC)
6. Department of State's workshop & networking event, Rosslyn, VA
7. IBM Corporate Supplier Diversity Coordinators Council Meetings, Somers, NY
8. Quarterly SBA Empowerment Breakfasts, Denver, CO
9. National Minority Supplier Development Council (NMSDC) Conference and Business Opportunity Fair
10. Department of Commerce Minority Enterprise Development Week Convention, Washington, DC
11. AFCEA and the US Naval Institute's Western Conference and Exposition
12. SBA/Veteran Administration Outreach Conference, Denver CO
13. DoD, DCMA, SBLO Training, Colorado Springs, CO

**B. Internal Efforts to guide and encourage purchasing personnel include:**

1. Workshops, seminars, and training programs that are conducted throughout the year.
2. Source lists, guides and other data have been established and are maintained for potential small, small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small businesses.
3. Subcontracting plan performance compliance is regularly evaluated and monitored.

**C. Additional efforts include:**

1. IBM Business Consulting Services – Public Sector's purchasing group presents a "Small Business Champion Award" to buyers that demonstrate a leadership attitude, a solid commitment and outstanding performance concerning our small business program.
2. Small business performance is an individual measurement for all buyers and procurement managers that support IBM Business Consulting Services.

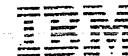
**CLAUSE INCLUSION AND FLOW DOWN (FAR 19.704(A)(9) (FAR 52.219-9(D)(9))**

IBM Business Consulting Services assures the inclusion of FAR 52.219-8, "Utilization of Small Business Concerns and Small Disadvantaged Business Concerns," in all subcontracts that offer further subcontracting opportunities. IBM will also require all subcontractors, except for small businesses, that receive subcontracts in excess of \$500,000 (\$1,000,000 for construction) adopt and comply with a similar plan required by FAR 52.219-9, "Small Disadvantaged Business Subcontracting Plan."

IBM agrees that the clause will be included and that the plans will be reviewed against the minimum requirements for such plans. The acceptability of percentage requirements for small, small disadvantaged and women-owned small business firms must be determined on a case-by-case basis depending on the supplies and services involved, the availability of potential small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business subcontractors and prior experience. Once the plans are negotiated, approved, and implemented, the plans will be monitored through the submission of periodic reports, including SF (Standard Form) 294 and 295 reports.

**REPORTING AND COOPERATION (FAR 19.704(A)(10) (FAR 52.219-9(D)(10))**

IBM Global Business Services will (1) cooperate in any studies or surveys as may be required, (2) submit periodic reports which show compliance with the subcontracting plan; (3) submit its small business reporting electronically via eSRS, specifically ISRs, "Individual Subcontracting Reports for Individual



Contracts,” and SSR, “Summary Subcontract Report,” in accordance with the instructions on [www.esrs.gov](http://www.esrs.gov) ; and (4) assure that subcontractors agree to submit ISRs and SSRs.

IBM will submit, and require that first tier large business subcontractors submit, to the Contracting Officer the following forms enabling receipt within 30 days after the close of each calendar period, as follows:

Calendar Period	Report Due	Date Due	Send Report To
10/01 – 09/30	SSR	10/30	Contracting Officer/Government Agency
10/01 – 03/31	ISR	04/30	Contracting Officer/Government Agency

### Good Faith Commitment

IBM Global Business Services understands that maximizing practicable utilization of small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small businesses as subcontractors in Government contracts is a matter of national interest with both social and economic benefits. In order to demonstrate determination to comply with a good faith effort and achieve the small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business subcontracting requirements, the steps IBM Global Business Services will take are outlined.

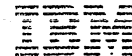
IBM Business Consulting Services continues its active participation in organizations and associations that promote successful outreach to small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small businesses. We will utilize the CCR/PRO-Net database link to search for new sources. We will continue to utilize other resources such as the “Diversity Information Resource Inc.” Directory (formerly the “Try US” directory) and IBM corporate supplier databases. We will continue to stay in close contact with local SBA offices utilizing their expertise and extensive network to identify new sources. Our efforts to develop the capability and business volume with existing small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business firms continue. We are willing to take necessary risk as we develop these small business firms.

Specific examples of how IBM Business Consulting Services - Federal will continue to maintain focus on small business requirements include our participation in, or use of:

**Trade Fairs.** We plan continued participation in the following events: National Minority Supplier Development Council (NMSDC), Minority Enterprise Development Week (MEDWEEK), Department of the Treasury’s Prime Contractor Outreach Session, USDA’s Federal Subcontracting Forum, Workshop and Opportunities Fair, SBA’s Procurement Conference and Business Opportunity Expo, Federal Small Business Technology Council’s (FSBTC), SBA/Veteran Association Outreach Conference, Procurement Conference, Rocky Mountain Small and Disadvantaged Business Opportunity Council’s (SADBOC) networking events, and Department of State’s workshop and networking event.

**Associations.** IBM has continuing involvement with associations such as the National Minority Supplier Development Council (NMSDC), the Asian American Business Development Center (AABDC), American Indian Business Leaders (AIBL), National Center for American Indian Entrepreneurial Development, National Association of Women Business Owners (NAWBO), National Women’s Business Council, SADBOC, and FSBTC. This involvement affords considerable opportunity to IBM in its efforts to identify and develop diverse small businesses.

**“Diversity Information Resources, Inc.” Directory (formerly “TRY US” Directory).** IBM will continue to be a corporate user of the “Diversity Information Resources Inc” Directory, published by the National Minority Business Directories. Minority businesses may list their services in this directory without charge to facilitate business between minority firms and corporate and government purchasing officials. IBM is a sponsor of this organization.



“CCR/PRO-Net”. IBM actively uses this Internet-based database which is accessible through the DoD Central Contractor Registration ([www.ccr.gov/](http://www.ccr.gov/)). It is a fast and reliable tool enabling our location of small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned firms. The purchasing group that supports IBM Business Consulting Services uses the Central Contractor Registration’s tool extensively for identifying potential small business sources.

**Other Sources of Information.** IBM’s buyers are instructed to use all available sources of information, such as state and local lists of minority suppliers, local Chambers of Commerce, the NMSDC database, and the SBA and agency OSDBU networks.

IBM’s commitment to excellence in the area of subcontracting to small, small disadvantaged and women-owned small business, HUBZone and Veteran Owned businesses is evident in management policies at all levels of the corporation. This is one of the many reasons IBM will continue its long-standing leadership role and commitment to foster the development and utilization of small businesses through active procurement from these companies. Our small business program enjoys the total support and commitment of executive management at the highest level of the IBM Corporation.

IBM also recognizes the expanding cultural diversity of the work force in our industry. Our policies for hiring and aiding disadvantaged groups in our industry’s work force have, for many years, sought to utilize and expand the pool of highly skilled technical professionals in those groups. Our policies demonstrate our commitment to corporate citizenship and are effective methods for addressing the increasing shortage of qualified technically skilled professionals. IBM Business Consulting Services will continue IBM’s tradition of demonstrating corporate leadership, by using firms that advance these principles.

IBM Business Consulting Services is extremely proud of its contribution to IBM’s success in developing diverse business relationships. Our intense level of dedication to that ongoing contribution is specifically demonstrated through our active outreach participation and our association involvement. IBM Business Consulting Services is extremely proud of its contribution to IBM’s success in developing diverse business relationships. Our intense level of dedication to that ongoing contribution is specifically demonstrated through our active outreach participation and our association involvement. Because of IBM’s long standing track record and Business Consulting Services’ diverse business focus we are poised for successfully achieving the small business requirements under this contract.

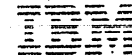
## **IBM Recognition**

As an integral part of its outreach activities, IBM provides support to a number of key diverse business oriented associations and organizations. This support may take a variety of forms, including direct financial grants, equipment and technical support, participation in conventions and trade fairs, as well as time and effort of IBM executives and professionals. These contacts allow IBM to contribute effectively to the development and support of diverse business firms across a broad spectrum of industries, and provides valuable information on new companies with potential for developing a business relationship with IBM. Some examples of these organizations include the NMSDC, NAWBO, WBENC, USHCC, Native American Alliance, MEDWEEK, USPAACC and a number of local M/WBE advocacy and development groups. Examples of how IBM has been recognized by these organizations and others as follows:

### **2006**

- IBM was recognized by Diversity Business.Com as one of their Top Corporations
- IBM was recognized by the Women’s Business Enterprise National Council as one of their Top Corporations.
- IBM was recognized by United Indian Development Agency as their Corporation of the Year.





- Michael Pagliaro was recognized by the National Center for American Indian Enterprise Development
- IBM received the Corporation of the Year Award from the Florida Minority Supplier Development Council.
- Eileen Byrne-Halczyn received the Buyer of the Year Award from the Florida Minority Supplier Development Council.

## 2005

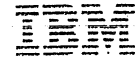
- IBM was recognized by DiversityBusiness.Com as one of their Top Corporations
- IBM was recognized by the Women's Business Enterprise Council as one of their Top Corporations
- IBM received the Frances Perkins Van Guard Award from the SBA
- Michael Pagliaro received the Advocate of the Year Award from the United Indian Development Agency
- Sherry Robison received the Shining Star Award from the Women's Business Development Center of PA/NJ/DE
- IBM named one of Asian Enterprises Top Corporations
- IBM received the Corporation of the Year Award from the Michigan Minority Supplier Development Council
- IBM received the Corporation of the Year Award from the NYNJ Minority Supplier Development Council
- IBM received the Corporation of the Year Award from the National Minority Supplier Development Council

## 2004

- IBM was recognized by DIV2000 as one of their Top Corporations
- IBM received the Corporation of the Year Award from the Women's Business Enterprise National Council
- IBM received the Corporation of the Year Award from the Women's Business Development Center of PA/NJ/DE
- Javette Jenkins, Director of the IBM Supplier Diversity Program, received the TrailBlazer Award from the Black Business Professionals Entrepreneurs
- 2004 IBM's Mentor-Protégé Program received an Award from the Defense Information Systems Agency for "Dedication, Professionalism and Outstanding Support of the Mentor-Protégé Program."
- 2004 Collins Consulting, Inc. (SDB, Service Disabled Veteran) was nominated by IBM for the Small Business Subcontractor of the Year award. They won the Illinois Regional Award at SBA's national convention in May 2004 led by Mr. Hector Barreto, SBA Administrator. Collins is an IBM Corporate Mentor Protégé firm.
- 2004 AEEC was nominated for the Small Business Subcontractor of the Year award by IBM. AEEC received the Administrator's Award of Excellence certification at SBA's national convention in May 2004 led by Mr. Hector Barreto, SBA Administrator.
- Eileen Byrne-Halczyn received the Buyer of the Year Award from the Florida Minority Supplier Development Council.

## 2003

- IBM was honored at the Div 2000.com Multicultural Awards Ceremony as the top U. C. company for business opportunities for women and minority owned firms;
- IBM received the National Corporation of the Year Award from the Florida Regional Minority Business Council;
- I. Javette Jenkins, Director of the IBM Supplier Diversity Program, and Tom Trotter, IBM Marketing Director of Corporate Community Relations, were recognized by the Women's Business Enterprise National Council with their 2003 Applause Award;



- IBM received the Corporation of the Year Award from the Florida Minority Supplier Development Council;
- IBM was recognized by the Women's Business Enterprise Alliance (Houston) as one of the Top 25 Corporate Champions in supporting women business owners;
- IBM was recognized with the Corporation of the Year Award by Race for Success, Inc., for demonstrating outstanding leadership and commitment to diversity and minority business development;
- I. Javette Jenkins received the Celebrating Business Women of Color Award from the Maryland/District of Columbia Minority Supplier Development Council;
- John Paterson, IBM V.P. Chief Procurement Officer of Integrated Supply Chain, was recognized by the NMSDC for his exemplary support of the Corporate Plus Program;
- LaJuanda Hannah, was recognized by the Central South Texas Minority Business Council as their Advocate of the Year;
- Bill Brown was recognized by the Asian Business Association as their Corporate Advocate of the Year.

#### **Record Keeping FAR 19.704(a)(11)**

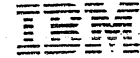
IBM Business Consulting Services will maintain to demonstrate the procedures adopted to comply with the requirements and requirements in the subcontracting plan include:

- A. Small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business source lists, guides and other data identifying such suppliers.
- B. Organizations contacted for small, small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business sources.
- C. On a contract-by-contract basis, records on subcontract solicitations over \$100,000 which indicate for each solicitation (1) whether small business firms were solicited and, if not, why not; (2) whether HUBZone small business firms were solicited and, if not, why not; (3) whether small disadvantaged business firms were solicited and, if not, why not; (4) whether women-owned small business firms were solicited and, if not, why not; (5) whether veteran-owned small business firms were solicited and, if not, why not; and (6) reasons for the failure of solicited small, small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business firms to receive the subcontract award.
- D. Records to support other outreach efforts, e.g. contacts with minority and small business trade associations, attendance at small and minority business procurement conferences and trade fairs.
- E. Records to support internal activities to (1) guide and encourage purchasing personnel, e.g., workshops, seminars, training programs, incentive awards; and to (2) monitor activities to evaluate compliance.
- F. On a contract-by-contract basis, records to support subcontract award data including the name, address and business size and ownership status (SDB, WOSB, etc.) of each subcontractor.

#### **Timely Payment to Subcontractor**

Other records to support compliance with the subcontracting plan are available upon request from the contracting officer. The level of effort necessary to accommodate additional record requirements may necessitate a cost proposal and contract modification.

IBM Business Consulting Services agrees to comply with FAR 19.702 and has established and actively uses procedures that promote timely payment of amounts due pursuant to the terms of subcontracts with small, small disadvantaged, women-owned, HUBZone, veteran and service-disabled veteran owned small business firms.



**SIGNATURES REQUIRED**

This subcontracting plan was SUBMITTED by:

Signature:

Typed Name: Peter Clarke

Title: Small Business Liaison Officer

Date: 07/30/2007

This subcontracting plan was REVIEWED and ACCEPTED by Government Contracting Officer:

Signature:

\_\_\_\_\_  
Typed Name:

\_\_\_\_\_  
Title:

\_\_\_\_\_  
Date: