



General Services Administration
Public Buildings Service
Washington, DC 20405

PQRP-92-04

JUL 16 1992

MEMORANDUM FOR ALL REAL PROPERTY LEASING ACTIVITIES
(PQRP DISTRIBUTION LIST)

FROM: ROBERT J. DILUCHE
ASSISTANT COMMISSIONER
FOR REAL PROPERTY DEVELOPMENT - PQ

SUBJECT: Small Business Subcontracting Plans

1. Purpose. To provide copies of changes to the sample Small Business and Small Disadvantaged Business Subcontracting Plan issued with our acquisition letter PQRP 91-07, dated December 6, 1991.
2. Background. These changes have been made as a result of input from the Office of Small and Disadvantaged Business Utilization (AU) in consultation with the Office of GSA Acquisition Policy (VP), in order to make the subcontracting plan more compatible with the FAR. The changes involve the addition of a subcontracting goals total section in paragraph 1, repositioning of text and the addition of a FAR reference in paragraph 1(h).
3. Effective Date/Expiration Date. This acquisition letter is effective upon issuance and will expire June 30, 1993, unless otherwise extended or cancelled.
4. Cancellation. Acquisition Letter PQRP 91-07 dated December 6, 1991, entitled Small Business Subcontracting Plans is hereby cancelled.
5. Coverage. All real property leasing activities.
6. Instructions/Procedures. We reiterate that the attached sample Small Business (SB) and Small Disadvantaged Business (SDB) Subcontracting Plan is provided as a suggested format for offerors to submit subcontracting plans. Regions will provide the format to offerors if requested, and render appropriate assistance to enable completion. Attention is invited to the fact that separate goals are required for each option period of the lease acquisition.

Attachments

**SMALL BUSINESS (SB) AND SMALL DISADVANTAGED
BUSINESS (SDB) SUBCONTRACTING PLAN**

DATE: _____

CONTRACTOR: _____

ADDRESS: _____

CITY: _____ STATE: _____ ZIP CODE: _____

SOLICITATION OR CONTRACT NUMBER: _____

The following, together with any attachments, is hereby submitted as a Subcontracting Plan to satisfy the applicable requirements of FAR Clause 52.219-9.

1. The following goals (expressed in both dollars and percentage of the total planned subcontracting dollars) are applicable to the contract cited above, or to the contract awarded under the solicitation cited.

	<u>CONSTRUCTION ASPECT</u>	DOLLARS	PERCENT
(a) Total planned subcontracting to all types of business concerns under this contract.	(Initial Term)	\$ _____	100%
	(Renewal/option)	\$ _____	<u>100%</u>
(b) Planned subcontracting to small business (including small disadvantaged businesses).	(Initial)	\$ _____	%
	(Renewal/option)	\$ _____	%
(c) Planned subcontracting to small disadvantaged businesses.	(Initial)	\$ _____	%
	(Renewal/option)	\$ _____	%
	<u>SERVICES ASPECT</u>		
		DOLLARS	PERCENT
(a) Total planned subcontracting to all types of business concerns under this contract.	(Initial Term)	\$ _____	100%
	(Renewal/option)	\$ _____	<u>100%</u>
(b) Planned subcontracting to small business (including small disadvantaged businesses).	(Initial)	\$ _____	%
	(Renewal/option)	\$ _____	%
(c) Planned subcontracting to small disadvantaged businesses.	(Initial)	\$ _____	%
	(Renewal/option)	\$ _____	%

TOTAL SUBCONTRACTING GOALS (CONSTRUCTION AND SERVICES)
(Add Construction and Service rows from previous page.)

DOLLARS PERCENT

(a)+(a)	Total planned subcontracting to all types of business concerns under this contract.		
	Initial term.....	\$ _____	_____ %
	Renewal/option.....	\$ _____	_____ %
(b)+(b)	Total planned subcontracting to small business (including small disadvantaged businesses).		
	Initial term.....	\$ _____	_____ %
	Renewal/option.....	\$ _____	_____ %
(c)+(c)	Total planned subcontracting to small disadvantaged businesses.		
	Initial term.....	\$ _____	_____ %
	Renewal/option.....	\$ _____	_____ %

(d) A description of the method used to develop the above subcontracting goals:

(e) The following principal supplies and services will be subcontracted under this contract, and the distribution among SB and SDB concerns is as follows:

Construction Aspect:

Services Aspect:

(NOTE: Supplies/services planned to be subcontracted to small business concerns should be identified by an (*); those for small disadvantaged businesses by a (**). As an example, "nails* and plastic bags**, ...janitorial and yard supplies**", etc. Only items applicable to the specific contract should be included. Use attachments if necessary.)

(f) Indirect and overhead costs (Check one below):
_____ have been included _____ have not been included
in the goals specified in (b) and (c) above.

(g) If "have been included" is checked, explain the method used in determining the proportionate share of indirect and overhead costs to be allocated as subcontracts to small business concerns and to small disadvantaged business concerns.

(h) The following methods were used to identify potential sources for offeror solicitation purposes (see FAR 52.219-9(d)(5)):

2. The following individual will administer the subcontracting program:

Name: _____

Address & Telephone: _____

Title: _____

This individual's specific duties, as they relate to the firm's subcontracting program, are as follows:

General overall responsibility for this company's SB Program, the development, preparation and execution of individual subcontracting plans for monitoring performance relative to contractual subcontracting requirements contained in this plan, including but not limited to:

- (a) Developing and maintaining bidders lists of SB and SDB concerns from all possible sources.
- (b) Ensuring that procurement packages are structured to permit SB and SDB concerns to participate to the maximum extent possible.
- (c) Assuring inclusion of SB and SDB concerns in all solicitations for supplies or services which they are capable of providing.
- (d) Reviewing solicitations to remove statements, clauses, etc., which may tend to restrict or prohibit SB and SDB participation.
- (e) Ensuring periodic rotation of potential subcontractors on bidders lists.
- (f) Ensuring that the bid proposal review board documents its reasons for not selecting low bids submitted by SB and SDB concerns.
- (g) Ensuring the establishment and maintenance of records of solicitations and subcontract award activity.
- (h) Attending or arranging for attendance of company counsellors at business opportunity workshops, minority business enterprise seminars, trade fairs, etc.

- (i) Conducting or arranging for conduct of motivational training for purchasing personnel pursuant to the intent of the Small Business Act.
- (j) Monitoring attainment of goals.
- (k) Preparing and submitting periodic subcontracting reports required, SF 294 and/or SF 295.
- (l) Coordinating contractor's activities during the conduct of compliance reviews by Federal agencies.
- (m) Coordinating the conduct of contractor's activities involving its SB and SDB subcontracting program.
- (n) Additions to (or deletions from) the duties specified above are as follows:

3. The following efforts will be taken to assure that SB and SDB concerns will have an equitable opportunity to compete for subcontract:

- (a) Outreach efforts will be made as follows:
 - (i) Contacts with minority and SB trade associations.
 - (ii) Contacts with business development organizations.
 - (iii) Attendance at small and minority business procurement conferences and trade fairs.
 - (iv) Sources will be requested from SBA's PASS System.
 - (v) List other efforts to identify potential sources.

- (b) The following internal efforts will be made to guide and encourage buyers:
 - (i) Workshops, seminars and training programs will be conducted.
 - (ii) Activities will be monitored to evaluate compliance with this subcontracting plan.
- (c) SB and SDB concerns source lists, guides and other data identifying SB and SDB concerns will be maintained and utilized by buyers in soliciting subcontracts.
- (d) Additions to (or deletions from) the above listed efforts are as follows:

4. The contractor agrees that the clause entitled "Utilization of Small Business Concerns and Small Business Concerns Owned and Controlled by Socially and Economically Disadvantaged Individuals" will be included in all subcontracts which offer further subcontracting opportunities, and all subcontractors except small business concerns who receive subcontracts in excess of \$500,000 will be required to adopt and comply with a subcontracting plan similar to this one. Such plans will be reviewed by comparing them with the provisions of FAR 52.219-9, and assuring that all minimum requirements of an acceptable subcontracting plan have been satisfied. The acceptability of percentage goals shall be determined on a case-by-case basis depending on the supplies/services involved, the availability of potential small and small disadvantaged subcontractors, and prior experience. Once approved and implemented, plans will be monitored through the submission of periodic reports (SF 294 and/or SF 295), and the contractor will ensure that its subcontractors agree to submit SF 294 and SF 295.

5. The contractor agrees to submit such periodic reports (SF 294 and/or SF 295) and cooperate in any studies or surveys as may be required by the contracting agency or the Small Business Administration in order to determine the extent of compliance by the contractor with the subcontracting plan and with the clause entitled "Utilization of Small Business Concerns and Small Business Concerns Owned and Controlled by Socially and Economically Disadvantaged Individuals," contained in the contract.

6. The contractor agrees that it will maintain at least the following types of records to document compliance with this subcontracting plan:

- (a) SB and SDB concerns source lists, guides and other data identifying SB/SDB concern vendors.
- (b) Organizations contacted for SB and SDB sources.
- (c) On a contract-by-contract basis, records on all subcontract solicitations over \$100,000, indicating on each solicitation (1) whether SB concerns were solicited, and if not, why not; (2) whether SDB concerns were solicited, and if not, why not; and (3) reasons for the failure of solicited SB or SDB concerns to receive the subcontract award.
- (d) Records to support other outreach efforts: Contacts with Minority and Small Business Trade Associations, etc. Attendance at small and minority business procurement conferences and trade fairs.
- (e) Records to support internal activities to guide and encourage buyers: workshops, seminars, training programs, etc. Monitoring activities to evaluate compliance.
- (f) On a contract-by-contract basis, records to support subcontract award data to include name, address, and business size of subcontractor.

(g) Records to be maintained in addition to the above are as follows:

Signed: _____

Typed Name: _____

Title: _____

Date: _____

Plan Accepted By: _____
Contracting Officer

Date: _____

NOTE TO CONTRACTING OFFICER: Upon incorporation of a plan into the contract, indicate herein the estimated dollar value of contract: \$ _____.