

VA



U.S. Department
of Veterans Affairs

Small Business Subcontracting Plan Overview & Preparation Guide

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VA Federal Supply Schedule (FSS) Service
November 14, 2023



- This session is being recorded and will be made available on our [Subcontracting](#) and [Training](#) web pages.
- Mute mics during the presentation.
- Hold questions until the end of the presentation.
- If you have question(s) that are not submitted/addressed during this session, please send them to SubcontractingVAFSS@va.gov.



- Plan Requirements Overview
- Commercial vs. Individual Plans
- Plan Elements (Step-by-Step)
- Review Process
- Checklist for Common Issues/Tips
- Resources/Contacts



Plan Requirements Overview

Why am I required to maintain a subcontracting plan?

Per FAR 19.702, plans are required for all contracts

- 1) with an estimated value over \$750,000 (for the full contract term, including the base and options),
- 2) with further subcontracting opportunities, and
- 3) when the contract holder is classified as an “other than small business”.

What are the required components of an acceptable plan?

- **Elements:** FAR clause 52.219-9(d) contains the elements required of an acceptable plan. Our template mirrors verbiage in the FAR.
- **Template – FSS vs. Other**
 - FSS Template is FAR compliant
 - Other templates must contain all FAR elements and verbatim assertions
 - Using other templates will delay review as we must verify FAR compliance



Commercial vs. Individual Plans

52.219-9(g)

“A commercial plan **is the preferred type** of subcontracting plan for contractors furnishing commercial items. The commercial plan shall relate to the offeror’s planned subcontracting generally, for both commercial **and** Government business, rather than solely to the Government contract.”



	Commercial Plans (Division & Company-wide)	Individual Plans
Plans (goals)	Submitted annually <i>Goals can be adjusted annually based upon your company's current climate</i>	Submitted once for the entire performance period with separate goals for base and each option period <i>Tied to goals that may have been over-estimated initially</i>
	Includes all company spend, including indirect costs <i>All dollars spent count towards goals</i>	Includes only dollars spent in support of one contract and may include indirect costs on a pro-rated basis <i>Must maintain documentation of how each pool of spend is allocated/attributed to supporting the specific VA contract.</i>
	One signed plan for all government contracts <i>52.219-9(g)</i>	Must have an individual plan for each government contract <i>May have to maintain multiple plans simultaneously</i>
eSRS Reports (actual results)	Submit annual SSR (due by October 30 th)	Submit annual SSR (due by October 30 th)
		Also submit <u>biannual</u> ISR (due by March 30 th and October 30 th) <i>Two extra reports & potentially for each order</i>



Plan Elements (Step by Step)

- **Annual Commercial Plans:** Plan period must coincide with the company's fiscal year *FAR 52.219-9(b)*
- **Initial, Proposed Commercial Plans**
 - Should reflect company's entire fiscal year while the contract is negotiated.
 - Just prior to contract award
 - Plan start date will reflect contract start date
 - Plan end date will reflect end of company's fiscal year
 - Dollars will be pro-rated to shorter or longer than a 12-month period, e.g. 10/1/22 – 12/31/23 (15-months) **or** 6/1/22– 12/31/23 (7-months)

SUBCONTRACTING PLAN PERIOD: [Enter start date of fiscal year] - [Enter end date of fiscal year]

Individual plans should cover the entire period of performance, and **commercial plans should coincide with the company's fiscal year**. In the event your company's fiscal year is for a period that will end before the contract periods of any federal contracts you hold which include the requirement to have a small business subcontracting plan, **you will be required to submit a new subcontracting plan for approval thirty (30) days prior to expiration of the existing subcontracting plan**. In the event an acceptable plan cannot be negotiated prior to expiration of the existing subcontracting plan, your contract(s) may be terminated.

- **Performance Period:** Individual plans cover the entire contract performance period, including potential option years (i.e., 10-years for most FSS schedules).
- **Prior to Contract Award:** When proposing/negotiating an Individual Plan, leave the effective dates blank as that will be determined just prior to contract award.

SUBCONTRACTING PLAN PERIOD: [Enter start date of fiscal year] - [Enter end date of fiscal year]

Individual plans should cover the entire period of performance, and commercial plans should coincide with the company's fiscal year. In the event your company's fiscal year is for a period that will end before the contract periods of any federal contracts you hold which include the requirement to have a small business subcontracting plan, you will be required to submit a new subcontracting plan for approval thirty (30) days prior to expiration of the existing subcontracting plan. In the event an acceptable plan cannot be negotiated prior to expiration of the existing subcontracting plan, your contract(s) may be terminated.



- **Plans for Current Contractors & New Offerors**

Date submitted should be when the plan/proposal was submitted to FSS

- **Plans Revisions**

Date submitted should be revised with each re-submission

DATE SUBMITTED: [Enter date submitted. If plan has been revised, enter revision date]

- **Company Level:** Name and UEI (used for eSRS filing) must reflect highest company level covering the plan
- **FSS Contractor:** If the planholder is different from the contract holder, it must be covered as a listed subsidiary

NAME OF PLANHOLDER:

UEI OF PLANHOLDER:

- **Complete Listing:** Each subsidiary included must be clearly identified here or on a referenced attachment and must include the contract holder (if not the planholder)
- **No Subsidiaries:** Indicate “none” or “N/A” if not including subsidiaries (don’t leave blank)
- **Company Affiliation:** Subsidiaries must fall under the plan holder; can’t be parallel or upper affiliates in company structure

SUBSIDIARIES INCLUDED: [Enter "None" or specific names of included subsidiaries]

The address must be that of the planholder listed above on the template.

NAME OF PLANHOLDER:

UEI OF PLANHOLDER:

ADDRESS:

- List the general type(s) of items/services covered by the plan (e.g. pharmaceuticals or temporary staffing)
- Do not state brand names, item numbers, contract number, schedule, SIN category

ITEM/SERVICE TYPE: [Enter product/service type, not contract number, schedule, or SIN]

- **“Subcontract” - Commercial:** Refers to all external company domestic spend, including all indirect spend
- **“Subcontract” - Individual:** Refers to external company domestic spend in support of the one specific government contract
- **Exclusions:** Foreign spend, company affiliate spend, lower tier spend, and specific categories listed at *FAR 52.219-9(g)*

1. TYPE OF PLAN

Subcontracting/Spend: "SUBCONTRACT," as used in 52.219-9, *refers to your external company spend, meaning any agreement (other than one involving an employer-employee relationship) entered into by a federal government prime contractor or subcontractor calling for supplies or services required for performance of the contract or subcontract.*

Excluded Categories of Spend: *Per 52.219-9(g), the following categories should not be included in the total subcontracting spend base in #1, the proposed goals in #2, nor in the categories of spend listed in #3: Employee salaries and benefits; payments for petty cash; depreciation; interest; income taxes; property taxes; lease payments; bank fees; fines, claims, and dues; original equipment manufacturer relationships during warranty periods (negotiated up front with the product); utilities and other services purchased from a municipality or an entity solely authorized by the municipality to provide those services in a particular geographical region; and philanthropic contributions.*

“Subcontract award data reported by the Contractor and subcontractors shall be limited to awards made to their immediate next-tier subcontractors.” 52.219-9(I)

NOTE: Although the SBA’s regulations at 13 CFR 125.3(a)(1)(i)(C) permit individual planholders to receive credit for lower-tier spend, this change has not been incorporated into the FAR.

Contractors are bound by the FAR clauses in their contracts; therefore, you cannot receive credit for lower tier spend.

Select either an individual or commercial plan.

Select only one of the following plan types (a or b), listing the total estimated dollar value of all planned subcontracting (to all types of business concerns, both **large and small**).

a) Individual Plan (This Contract Only) Contract #/Solicitation #

Total value of projected subcontracts (both **large and small** businesses)

Base Period \$ 5-Year Option \$

Total Contract Value (including options) \$

*Separate goals **must** be included for each option period (see #2 and chart on last page)

b) Commercial Plan (***select one of the following plan types***):

Company-wide or **Division-wide**

Total value of projected subcontracts (both **large and small** businesses), including all indirect costs except as described in #1 above \$

Total projected sales \$ (Subcontracts Represent % of Total Annual Sales)

- **Contract #/Solicitation #:** List the solicitation number; will be revised with contract number prior to contract award
- **Total Value of Projected Subcontracts/Spend (Base & Option Periods):** Provide total spend (both small and other-than-small) *that supports the specific contract only*; may include indirect costs on pro-rated basis
- **Total Contract Value:** Include your estimated total contract value; will be revised prior to contract award with awarded value

a) **Individual Plan** (This Contract Only) Contract #/Solicitation #

Total value of projected subcontracts (both **large and small** businesses)

Base Period \$ 5-Year Option \$

Total Contract Value (including options) \$

*Separate goals **must** be included for each option period (see #2 and chart on last page)



- **Company vs. Division-Wide:** Select one; carefully consider your choice and your company structure; can't include multiple divisions in *Division-wide*
- **Total Value of Projected Subcontracts/Spend:** Provide total spend (both small and other-than-small), including all indirect costs
- **Projected Sales:** List total (government and commercial) projected sales for the 12-month period
- **Percentage of Total Annual Sales:** Divide projected spend by total projected sales (*e.g. \$500,000 spend ÷ \$2,000,000 sales = 25.0%*)

b) **Commercial Plan** (select one of the following plan types):

Company-wide or Division-wide

Total value of projected subcontracts (both **large and small** businesses), including all indirect costs except as described in #1 above \$

Total projected sales \$ (Subcontracts Represent % of Total Annual Sales)

**2a. GOALS FOR COMMERCIAL PLANS (1-Year Goals)**

- a) Total estimated dollar value and percent of planned subcontracting with **small businesses (SB)** (including ANCs and Indian tribes), veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged (including ANCs and Indian tribes), and women-owned small business concerns: \$ and %
- b) Total estimated dollar value and percent of planned subcontracting with **veteran-owned small businesses (VO)**: \$ and %
- c) Total estimated dollar value and percent of planned subcontracting with **service-disabled veteran-owned small businesses (SDVO)** (Note: This is a subset of veteran-owned): \$ and %
- d) Total estimated dollar value and percent of planned subcontracting with **small disadvantaged businesses (SDB)** (including ANCs and Indian tribes): \$ and %
- e) Total estimated dollar value and percent of planned subcontracting with **women-owned small businesses (WO)**: \$ and %
- f) Total estimated dollar value and percent of planned subcontracting **with HUBZone small businesses (HUB)**: \$ and %

**2b. GOALS FOR INDIVIDUAL PLANS (Two, Five-Year Goals)**

- a) Total estimated dollar value and percent of planned subcontracting with **small businesses (SB)** (including ANCs and Indian tribes), veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged (including ANCs and Indian tribes), and women-owned small business concerns:
Base (5-years): \$ _____ & _____% & 5-Year Option: \$ _____ & _____%
- b) Total estimated dollar value and percent of planned subcontracting with **veteran-owned small businesses (VO)**:
Base (5-years): \$ _____ & _____% & 5-Year Option: \$ _____ & _____% |
- c) Total estimated dollar value and percent of planned subcontracting with **service-disabled veteran-owned small businesses (SDVO)** (Note: This is a subset of veteran-owned):
Base (5-years): \$ _____ & _____% & 5-Year Option: \$ _____ & _____%
- d) Total estimated dollar value and percent of planned subcontracting with **small disadvantaged businesses (SDB)** (including ANCs and Indian tribes):
Base (5-years): \$ _____ & _____% & 5-Year Option: \$ _____ & _____%
- e) Total estimated dollar value and percent of planned subcontracting with **women-owned small businesses (WO)**:
Base (5-years): \$ _____ & _____% & 5-Year Option: \$ _____ & _____%
- f) Total estimated dollar value and percent of planned subcontracting with **HUBZone small businesses (HUB)**:
Base (5-years): \$ _____ & _____% & 5-Year Option: \$ _____ & _____%

- **Calculations:** Percentage for each category is based upon the total value of projected subcontracting dollars (total “base” spend) in #1

Example:

HUBZone \$400,000 ÷ Total Subcontracting/base spend \$2,500,000 = 16%.

***IMPORTANT!** Calculations used the total “base” spend, not total SB spend.*

- **No 0.0% Goals:** Must propose goals for each category, no less than 0.1%
- **Rounding:** Percentages must be rounded to **one decimal place** to mirror online reporting of achievements at eSRS.gov

- **Multiple Category Counting:** All small business dollars count once in the Small Business category and can count multiple times in the subcategories

Example:

A \$500,000 subcontract with a small, veteran, woman-owned business would count once in the SB category and again in the VOSB and WOSB categories.

- **VOSB vs. SDVOSB**
 - **SDVO is a subset of VO; therefore,** VO percentage goal must always be higher than SDVO goal (*Having the same goals means that you would not be seeking out any VO businesses, only SDVO*) spend
 - SDVOSB spend counts in three places: SB, VOSB, and SDVOSB
- **Small Business (SB) Spend**
 - Will always be higher than the subcategories as they are subsets of SB spend.
 - The subcategories will not add up to total SB spend due to multiple counting

IMPORTANT!

We negotiate, and you are held accountable for, percentage goals, not dollar goals.

- Dollars listed in plan allow the percentage calculations to be made
- If total actual spend goes up/down during the plan period, **the percentage goals are applied** to the actual total dollar spend

- You must propose products/services to be purchased in **every** category.
- Don't list the same items for each category; examine each category independently.
- Commercial plans must list indirect cost categories; individual plans must list if checked in #6 as included.
- Don't include excluded categories.
- You must include spend categories regardless of whether you have control over the source of those products/services

3. PRODUCTS AND/OR SERVICES *Note: Commercial Plans must include all indirect costs.*

The types of products and/or services to be subcontracted are:

LB:

SB:

VO:

SDVO:

SDB:

WO:

HUB:

This question asks for the method/how you arrived at the proposed goals.

Examples could include:

- Historical data, previous spend history
- Projected forecast based upon current year's data
- Projected goals based on experience, business forecasts, & commitment to improvement, etc.

Additionally, this section is used to provide any necessary justification for goals or other explanations, such as how you plan to overcome prior deficiencies or reach “stretch” goals.

4. GOAL DEVELOPMENT

The following method was used in developing the subcontracting goals:



Justification is required for two reasons:

- 1) If you propose any category *percentage* goal that is less than your actual percentage achievement during the prior plan period
- 2) If you propose a *percentage* goal that is lower than any VA suggested goal

FY 2022 **suggested** goals are as follows (no goals released yet for FY23):

- Small Businesses: 17.5%
- Veteran-Owned Small Businesses: 5.0%
- Service-Disabled Veteran-Owned Small Businesses: 5.0%
- Disadvantaged Small Businesses: 5.0%
- Women-Owned Small Businesses: 5.0%
- HUBZone Small Businesses: 3.0%

IMPORTANT! Be specific in explaining the challenges faced in meeting the VA's suggested goals and address specific subcategories (*i.e., don't "broad stroke" justification; address each category independently as applicable*).

- Examples for proposing lower than the VA suggested goals include:
 - FDA registration/approval
 - Strict and/or unusual quality control/technical requirements
 - Buyer specifications
 - Proximity/Logistics – rural companies with few local SBs to meet needs
- Examples for proposing % goals lower than prior year achieved % include:
 - Prior SBs are now LBs; must search for new SBs
 - Moved to new location and lost local SBs
 - Eliminated a product line that supported WOSB spend

- This question is asking about specific resources planned to be used to find small businesses, such as
 - SBA Dynamic Small Business Search (DSBS, <http://dsbs.sba.gov>)
 - Sam.gov
 - Women’s Business Enterprise National Council (www.wbenc.org)
 - National Minority Business Council (www.nmbc.org)
- Generic responses, such as “internet sources” or “small business groups”, are not sufficient and do not show a good faith effort or a concrete way forward.
- Don’t just copy the list from the FAR, these slides, or other sources; list sources you actually intend to use; keep records of sources used.

5. IDENTIFYING POTENTIAL SOURCES

The following methods were used to identify potential sources for solicitation purposes (See FAR 52.219-9(d)(5) for examples of methods that may be used.):



- Check “have” been included; all indirect costs (i.e., G&A, overhead) must be included
- Do not complete the last fill-in

6. INDIRECT COSTS **Note: Commercial Plans must include all indirect costs.**

Indirect costs have have not been included in the dollar and percentage subcontracting goals stated above. (Check one.)

If "have been" is checked (and you are proposing an individual plan), explain the method used in determining the proportionate share of indirect costs to be incurred with small business (including Alaska Native Corporations and Indian tribes), veteran-owned small business, service-disabled veteran-owned small business, small disadvantaged business (including ANCs and Indian tribes), women-owned small business, and HUBZone small business concerns. **Note: Commercial planholders are required to include all indirect costs and will not need to provide the aforementioned explanation because the costs will be applied at 100%.**

Individual Plans: Check either “have” or “have not” been included.

- If including, you must provide an explanation of how you are arriving at the proportionate share allocated for various pools of spend
- You must examine each pool of spend independently (e.g. accounting, landscaping, marketing, attorney fees, etc.)
- Do not apply same percentage across all pools of indirect spend since the portion of support to the specific VA FSS contract could vary greatly from one pool of spend to the next
- For overarching spend categories (e.g. janitorial services), a good way to apply a percentage for individual plan holders is to compare the sales dollars generated by the specific contract vs. all other company sales

- List the individual responsible for oversight of the program; this individual will be contacted by us for all subcontracting plan and eSRS issues, including instructions, reminders, delinquency notices, etc.
- Be sure to be specific and comprehensive when listing duties, including direct involvement with or oversight of various aspects of your program
- Duties listed must include submission or oversight of timely proposed plan submission (30 days prior to prior plan expiration) **and** timely filing of eSRS reports (the SSR by Oct 30th and the ISR, if applicable by April 30th and Oct 30th)

7. PROGRAM ADMINISTRATOR

The following individual will administer the subcontracting program:

NAME:

TELEPHONE:

TITLE:

E-MAIL:

ADDRESS:

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

Provide both **internal and external proactive efforts** as a demonstration of your company’s “good faith effort” toward meeting your goals.

- **External Efforts – Examples:** 1) Contacts w/ SB, minority, WO, etc. trade associations & business development organizations and 2) Attendance at/sponsorship of SB conferences, trade shows, seminars, training programs, etc.

*IMPORTANT! You must identify **specific examples**. The examples above are only provided to demonstrate general areas for consideration.*

- **Internal Efforts – Examples:** Training for purchasing staff to ensure consideration of SBs for all procurements, instituting self-certification protocol with accounting department to properly classify spend, etc.

8. EQUITABLE OPPORTUNITY

The following [good faith efforts](#)* (internal and external) will be taken to assure that small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns will have an equitable opportunity to compete for subcontracts:



- **19.701 and 19.705-7(b):** The end of the plan template contains FAR language regarding “Good Faith Effort”; below is a partial screenshot of this language.
- **52.219-16 Liquidated Damages – Subcontracting Plan**
(a) Failure to make a **good faith effort** to comply with the subcontracting plan," as used in this clause, means a willful or intentional failure to perform in accordance with the requirements of the subcontracting plan approved under the clause in this contract entitled "Small Business Subcontracting Plan," or willful or intentional action to frustrate the plan.

*** Definition at FAR 19.701:**

Failure to make good faith effort to comply with the subcontracting plan means willful or intentional failure to perform in accordance with the requirements of the subcontracting plan, or willful or intentional action to frustrate the plan.

*** Determination of Good Faith Effort, FAR 19.705-7(b):**

(1) In determining whether a contractor failed to make a good faith effort to comply with its subcontracting plan, a contracting officer must look to the totality of the contractor's actions, consistent with the information and assurances provided in its plan. The fact that the contractor failed to meet its subcontracting goals does not, in and of itself, constitute a failure to make a good faith effort (see [19.701](#)). For example, notwithstanding a contractor's diligent effort to identify and solicit offers from

- **Requirements of Flow-Down Clause**
 - 1) Flow-down of 52.219-8 to all your subcontractors, and
 - 2) Requirement for your subcontractors (when listed criteria are met) to have a plan
- **Exception to Flow-Down Requirements – 52.219-9(j):**
 - Plans aren't required from subcontractors when the prime contract contains 52.212-5, which is included in all FSS contracts
 - VA FSS planholder only have to flow-down 52.219-8 and won't have to require subcontractors to have a plan unless your plan also covers another government contract which does not have clause 52.212-5

9. FLOW-DOWN CLAUSE

The offeror agrees that the FAR clause of this contract entitled "Utilization of Small Business Concerns" (52.219-8) will be included in all subcontracts that offer further subcontracting opportunities, and that the Offeror will require all subcontractors (except small business concerns) that receive subcontracts in excess of the applicable threshold specified in FAR 19.702(a) on the date of subcontract award, with further subcontracting possibilities to adopt a subcontracting plan that complies with the requirements of FAR clause 52.219-9 Small Business Subcontracting Plan.

NOTE: See exceptions listed in FAR 52.219-9(j).

- These are the assurances/agreement sections, verbatim from FAR 52.219-9(d).
- By signing the plan, you agree to abide by the verbiage in these sections.
- You cannot paraphrase or deviate from the language in these sections such that it changes the intent of the FAR, as these sections are FAR required components of an acceptable plan

9. **FLOW-DOWN CLAUSE**
10. **REPORTING & COOPERATION**
11. **RECORDKEEPING**
- 12 & 13. **UTILIZATION OF SMALL BUSINESS CONCERNS USED IN BID/PROPOSAL**
14. **SUBCONTRACTOR DISCUSSIONS WITH CO**
15. **PROMPT PAYMENT OF SMALL BUSINESS SUBCONTRACTORS**



- You must provide a signed, pdf copy of the plan via e-mail (do not mail original copies)
- We accept scanned copies of wet signatures and “digital” signatures
- We do not accept dropped images/jpegs of signatures or signature-like Word font

Signed: _____

Date Signed: _____

Typed Name:

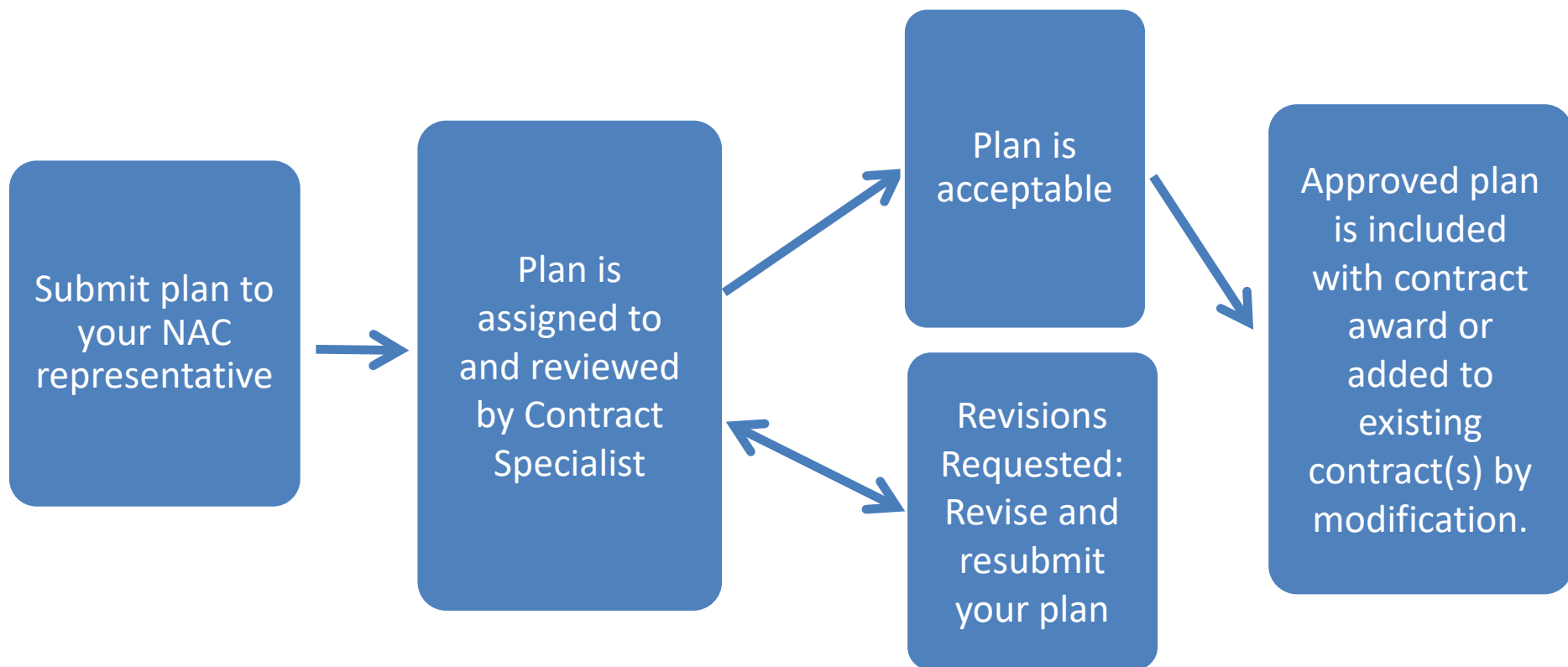
Title:

- Commercial Plan holders (except for initial plans) must complete this table.
- This serves as a comparative table of ...
 - 1) **Prior Year Goals:** What you proposed that your company would spend in the prior year's plan (*must match last year's approved plan*)
 - 2) **Prior Year Achievements:** What you actually spent/achieved last year (*should approximate eSRS reported spend*)
 - 3) **Current Goals:** What you propose to spend in the coming year (*must match total spend in #1 and goals in #2*)

	<u>Prior Year Goals</u>	<u>Prior Year Achievements*</u>	<u>Current Goals</u>
1. Total Subcontracting Dollars (both large & small businesses)	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
2a. Small Business Dollars	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
SB Percent of Line 1	<input type="text"/> %	<input type="text"/> %	<input type="text"/> %
2b. Small Veteran-owned Dollars	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>
VO Percent of Line 1	<input type="text"/> %	<input type="text"/> %	<input type="text"/> %



Review Process





Checklist for Common Issues/Tips

- ✓ **Template:** Are you using the most recent template or other FAR compliant template?
- ✓ **Plan Period - Commercial:** Does this reflect your company's fiscal year?
- ✓ **Date Submitted:** If resubmitting, did you revise the submission date?
- ✓ **Planholder Name/UEI/Address:** Do these all match?
- ✓ **Subsidiaries Included (if applicable)**
 - ✓ Are all covered subsidiaries included?
 - ✓ Do all fall under the named planholder in company structure?
 - ✓ Are all applicable contract holders covered by the plan listed?

#1 Total Projected Subcontracts/Spend

- ✓ Do the dollars listed reflect spend and not sales?
- ✓ Does the total include all spend (both small and large/other-than-small)?
- ✓ Did you make sure not to include any excluded category spend?

#2 Goal Calculations

- ✓ Are all goals rounded correctly to one tenth of a percent (i.e. 0.3%)?
- ✓ Are all goals at least 0.1% (no 0.0% goals)?
- ✓ Are percentages calculated against the total projected subcontracts/spend in #1 (not the SB spend in #2)?
- ✓ Is your SB goal higher than the subcategory goals?
- ✓ Did you count subcategory spend once under SB spend?
- ✓ Is your VOSB percentage goal higher than your SDVOSB goal?

#3 Products and/or Services

- ✓ Did you propose something for each category?
- ✓ Is your list comprehensive, including areas of spend for which you have no choice/control?
- ✓ Did you examine each category independently, not repeating the same list?
- ✓ Did you make sure that you aren't listing any excluded categories?
- ✓ Did you make sure to list indirect spend categories (*required for commercial plans, optional for individual plans per #6*)

#4 Goal Development

- ✓ Did you provide the **method/rationale** you used to arrive at your goals?
- ✓ Did you provide any necessary justification for your goals?
- ✓ Do your explanations address categories specifically?
- ✓ Do you address how you will overcome prior deficiencies or reach “stretch” goals?

- ✓ **#5 Identifying Potential Sources:** Did you list specific resources that you are using (*no generic/general references*)?

- ✓ **#6 Indirect Costs**
 - ✓ Did you select “have” or “have not” (you **must** choose one)?
 - ✓ If you selected “have” included and are filing an **individual** plan, did you properly answer the question re. your method for allocating spend?

- ✓ **#7 Program Administrator**
 - ✓ Did you list the individual responsible for oversight of the program?
 - ✓ Were you specific and comprehensive in listing the administrator’s duties?
 - ✓ Did you specifically list submission or oversight of timely proposed plan and eSRS submissions?

✓ #8 Equitable Opportunity

- ✓ Did you list internal and external proactive efforts to demonstrate a “good faith effort”?
- ✓ Did you list specific examples?

✓ Signature

- ✓ Did you provide a signed copy of the plan?
- ✓ Is your signature compliant, meaning a scanned copy of a wet signed document **or** a true digital signature (*no dropped images/jpegs*)?

✓ Goals/Achievements Table (for commercial plans only)

- ✓ Do your prior year goals match last year’s plan?
- ✓ Do your actual achievements mirror/approximate the SSR at eSRS.gov?
- ✓ Do your current year goals match the goals listed in #2?



Resources & Contacts

VA FSS Subcontracting Program e-Mail: SubcontractingVAFSS@va.gov

NCS Subcontracting Program e-Mail: NACSUBK@va.gov

VA FSS Subcontracting Web Page: <https://www.va.gov/opal/nac/fss/sbsp.asp>

Suggested minimum percentage goals

Training/guides (eSRS & Plan Preparation)

Subcontracting Plan template

VA FSS Training Web Page: <https://www.va.gov/opal/nac/fss/training.asp>

Upcoming webinars

Current and archived presentations

eSRS Home Page: <https://www.esrs.gov>

Log-in

User Guides & Training Materials (including “Quick Reference Guides”)

Sample Reports

eSRS Helpdesk: Federal Service Desk (FSD), <https://www.fsd.gov>, 866-606-8220 x3

AREA I: Janette Fasano, jannette.fasano@sba.gov, (617) 565-5622 - Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island and Vermont and the Commonwealth of Puerto Rico & Virgin Islands

AREA II: Rosetta Rodwell, rosetta.rodwell@sba.gov, (202) 941-8067 - Delaware, Maryland, Pennsylvania, Virginia and West Virginia, and the Washington, DC Metropolitan Area

Area III: Carol Thompson, carol.thompson@sba.gov, (404) 331-0139 - Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, and Tennessee

AREA IV: Pamela Beavers, pamela.beavers@sba.gov, (312)353-7381 - Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, Ohio, & Wisconsin

AREA V: Tanika L. Pierce, tanika.pierce@sba.gov, (817)684-5302 - Arkansas, Colorado, Louisiana, Montana, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, Utah and Wyoming

AREA VI: Nicholas Manalisay, nicholas.manalisay@sba.gov, (213)634-3804 - Alaska, Arizona, California, Hawaii, Idaho, Nevada, Oregon, Washington, and Guam

[**FAR 52.219-8**](#): Utilization of Small Business Concerns

[**FAR 52.219-9**](#): Small Business Subcontracting Plan

[**FAR 52.219-16**](#): Liquidated Damages – Subcontracting Plans

[**FAR 19.7**](#): The Small Business Subcontracting Program

[**Public Law 95-507**](#): Amendments to the Small Business Investment Act of 1958

[**13 USC 121**](#): Small Business Size Regulations

[**13 USC 125**](#): Government Contracting Programs



Questions?