



# SmallBiz Newsletter

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## The Scoop on Subcontracting Plans

### A. The BSA Subcontracting Plan (SCP)

The BSA Subcontracting Plan (SCP) has a tool to help YOU increase procurements with the small business subcategories and it's called:

#### Set-Asides

(As detailed in the SmallBiz Newsletter Vol. 15, February 2012) \*

There are three types of set-asides you are allowed/encouraged to use:

1. Small Business (including ANCs and Indian Tribes),
2. Construction, and
3. Sole Source (non-competitive)

A non-competitive set aside can be utilized when the anticipated value of the contract is **UNDER** \$3.5 million (\$4 million for construction and \$6 million in the case of manufacturing NAICS

codes) unless the award is being made to an Alaska Native Corporation (ANC).

There is no limit on the anticipated value of contracts awarded on a sole source (non-competitive) basis to an ANC.

\* See Vol. 15 Newsletter for details. Upon request, I will email you a copy.

### B. Subcontracting Plans with BSA's Large Business Contractors.

The following is a clarification on SCP Goals and Amendments procedures with our large business contractors:

I have previously stated:

Any "individual contract action, over the thresholds of \$650K or \$1.5M for construction, requires a SCP." I have asked you to request a new SCP for that specific Amendment from the large business contractor.

The above is what I was taught and it is **NOT** correct.

After a lot of investigation, I found that the following is the **CORRECT** procedure for SCP's (per FAR 52.219-9(i)):

"A contract may have no more than one plan. When a modification meets the criteria in 19.704 for a plan, or an option is exercised, the goals associated with the modification or option shall be

added to those in the existing subcontract plan.”

This means that **there is only one SCP per contract.**

***Only when all the subcontracting (as stated in the Contractors original SCP) has been completed, will a new SCP be requested from the large business. This is only if the Amendment is over the dollar threshold, and is issued for a new scope of work which includes an opportunities for work to be subcontracted. If there are no opportunities for subcontracting work on the Amendment, then a SCP Waiver (AMS-SWI-001/-003) shall be used.***

*The above requires a revision to AMS-SWI-701 Small Business Subcontracting Plan or Waiver Preparation. This revision will be published shortly.*

Again, I was taught that:

The Goals on the Individual Subcontracting Report (ISR) & Summary Subcontracting Report (SSR) - never change.

Based on information found when I was researching the above, this is **NOT** correct either.

If there is a change in the SCP goals then, the **CORRECT** procedure for the goals on the ISR/SSR reports to change to match the goals in the SCP.

As stated in the eSRS Quick Reference for Federal Government Subcontractors Guide (page 17, 6<sup>th</sup> Screen Subcontract Awards) under Current Goals:

“If your Individual Subcontracting Plan has option years, you should roll each option year into the base year goals, as the option years are executed.” See Attachment 1 for an example.

Please let me know if you have any questions.

## **FANTASTIC JOB – PPM TEAM**

**Awards over \$300,000 OR Set-Aside Awards to small businesses (in alphabetical order) by:**

**Ildiko Csehely-Orlando**

DCS Infrastructure LLC, VC 100277) Small, SDVOB, VOB, business was awarded a BNL construction BOA.

**Michelle Cooper**

NIOWAVE (VC 97827), a small business was awarded a contract valued at \$ 1.5M,

**Jody Mitchell:**

**Utilized a SDVOB set-aside** and placed an order with Four Points Technology (VC 067180), a Small, SDVOB, VOB, business who was awarded a contract valued at \$ 48,077.

Let me know of any small business awards you make that are over \$300,000 and I'll highlight you in the next SmallBiz Newsletter.

**The fourth quarter/year end small business results will be in the next SmallBiz Newsletter.**

**Please place as many HUB & SDVOB contracts as you can before the end of the fiscal year.**

**Thanks,** Jill Clough-Johnston, SBLO [clough@bnl.gov](mailto:clough@bnl.gov) or 631 344-3173