



DoD Subcontracting Program

TRIAD

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Subcontracting Policy

Agenda



- Emphasis on Subcontracting and Data
- Updates
- Policy Changes
- Resources



Emphasis on Subcontracting and Data

DoD Subcontracting Accounting Procedures Report submitted to House Armed Services Committee (2/13)

- Department's existing procedures **do** account for SB subcontracting at all tiers of a contract, **even though** that activity is not reported by the prime contractor and the prime contractor does not get "credit" for SB efforts of its subcontractors.



Emphasis on Subcontracting and Data

NDAA FY 13 included many SB provisions

- Section 1613 – Requires independent assessment of Federal procurement contracting performance of DoD in 7 areas.
 - 2/7: Quality and reliability of data on SB prime and subcontracting by DoD, and the reliability of the IT systems that the Department uses to track such data.



Emphasis on Subcontracting and Data

Mr. Kendall's issuance of Better Buying Power to achieve greater efficiency and productivity in defense spending

- Promote effective competition – increase SB roles and opportunities
 - Director, SBP – identify deficiencies in Department's subcontracting program, Government systems, and data and develop recommendations for improvements.



Updates

CSP Test Program

- Authorized through Dec 31, 2014
- OSBP completed study
- Issues to be addressed
 - Inefficient subcontracting data collection system
 - Transition plan which considers several options



Updates

Class Deviation (2012-O0014), providing Accelerated Payment to SB Subcontractors was rescinded 2/21/13 and **is still in effect** even though OMB issued an extension to the original policy (7/11/13).



Policy Changes

Class Deviation (2013-O0014)

- Only affects SSRs required under an Individual Subcontract Plan. Does not affect the ISR.
- Beginning with FY 14 reporting, the SSR will be submitted annually for the twelve month report period (Oct 1 – Sep 30)



Policy Changes

Class Deviation (2013-O0014)

- For FY 13 reporting
 - Contractors submit their consolidated SSR in eSRS to the Department of Defense (9700) and not to the department/agency which administers majority of subcontract plans or, for construction contractors, to each department/agency which awarded such type contracts



Policy Changes

Class Deviation (2013-O0014)

- For FY 13 reporting
 - Contractors do not submit the “SDB Year-End Report” or the “SDB Participation Report” as they are no longer authorized since 10 U.S.C 2323 has expired.



Training

October 16, 2:30-3:30 (Central)

- North Central Regional Council (NCRC) hosting web-based training session
- Subcontract Reporting – ISRs and SSRs
- Designed for small business professionals from government and industry
- POC: Ed Beussink, SB Director, 618-229-0401



Resources

- <http://www.acq.osd.mil/osbp/>
- “Electronic Subcontracting Reporting System (eSRS), Part 1 and 2, July 2013” training presentation
- “Tips for DoD Contractors Submitting Subcontracting Reports (Aug 2013)”
- DoD Subcontracting Program: The Basics (Aug 2013)
- OSBPInfo@osd.mil (questions and comments)
- <http://www/acq.osd.mil/dpap/>
- <https://acc.dau.mil/smallbusiness>