

## THE CREATION AND MAINTENANCE OF A SUBCONTRACT PLAN.

### **The Federal Small Business Subcontract Plan**

The Federal Small Business Subcontract plan is generally required when a proposal or award for a federal contract (including federal flow through contract funding) exceeds \$650K (Reference: Part 19 Federal Acquisition Regulations (FAR)). Exceptions may occur when no equipment, supplies, travel, consultants or subcontracts are required for the project. The Subcontract Plan must be included as part of the proposal's submission if required by the solicitation/RFP from the Federal agency.

### **The Request and Creation Process**

- Department and Sponsored Projects (SPA) collaborate on a proposal's specifics and the Agency's requirements to determine if a Subcontract Plan is needed (Contract must have a value of \$650K or more.)
- Department is advised to contact the Small Business Coordinator (SBC) as soon as possible to begin collaborative work on the Small Business Subcontract Plan.
- SPA will also immediately advise the SBC Coordinator of the department's impending need for a Small Business Subcontract Plan and provide a department contact and phone number.
- Department makes contact and begins collaboration with the Coordinator for the purpose of researching and selecting vendors that can best fill the needs of the plan as well as meet federal goals for doing business with the Small Business community.
- Vendor categories will include small majority owned businesses, Minority-owned businesses, Woman-owned businesses, Disabled-veteran owned businesses as well as Historic Minority Universities and Colleges when possible.
- Vendor research sources include the campus Small Business Directory, our in house vendor database the Procurement Department and existing System wide databases. We will also consult approved federal and state small business data bases.
- When necessary, vendors are replaced by like vendors during the life of the contract as needed.
- At the conclusion of the vendor research process a Small Business Subcontract Plan is created along with additional information as needed and submitted to SPA for inclusion with the overall proposal.
- If UCI is awarded the contract, an email notice and link to the award synopsis is forwarded to the SBC by SPA.
- The Office of Information and Technology (OIT) is then contacted by the SBC and advised to provide monthly expenditure reports for the contract's related fund number.
- Expenditure reports are generated by OIT and forwarded to the SBC on a monthly basis for review and confirmation in support of meeting our Federally mandated semi-annual and annual small business reporting requirements. These reports are reviewed by the Contracting officer and the Small Business Office at the federal agency and are used to determine if we are meeting the small business subcontracting goals set forth in the Subcontract Plan. Failure to meet the goals as set forth in the Small Business Subcontract Plan may result in a poor performance rating for that contract. Poor performance ratings may impact future federal contract funding to UCI.

- Expenditure reports will include activity for high value purchase orders, low value purchase orders, blanket purchase orders and PalCard purchases.
- Departments are to review PalCard reports for accuracy and forward them to the SBC on a monthly basis for their inclusion in the reporting process.
- Small Business Subcontract reports will be submitted by the SBC in April and October of each year during the life of the contract through the Federal Electronic Subcontracting Reporting System (ESRS).
- An email notice will then be sent to designated Departmental, SPA and Federal Agency personnel advising that a report is in the system for their review. Those designees will be able to access the ESRS system to view and print the latest reports.

#### **Role and Responsibilities of the Principal Investigators and Departments**

- Notify the Small Business coordinator promptly when it is determined that a proposal will be submitted or a contract award accepted when it meets the \$650K federal threshold.
- Begin collaboration with the Small Business Coordinator as soon as possible.
- Be as specific as possible when describing equipment, supplies, travel and any additional needs for the proposal/award.
- Notify Small Business Coordinator when contract is awarded.
- Immediately contact Small Business Coordinator if difficulty arises when attempting to meet established goals.

#### **Role and Responsibilities of Sponsored Projects Administration (SPA)**

- Notify the Small Business Coordinator promptly when a Request for Proposal (RFP) requiring a Small Business Subcontract Plan is received from the Principal Investigator/Department or a contract award is received that requires a Subcontract Plan. The proposal/award budget must exceed \$650K.
- Submit Small Business Subcontract Plan as prepared by the Small Business Coordinator to the appropriate Agency/Sponsor as part of the overall proposal or as required for an award.
- Notify the Small Business Coordinator if and when the contract is awarded.
- Works with the Small Business coordinator and the Department/Principal Investigator to ensure contract compliance

#### **Role and Responsibilities of Materiel Management/Small Business Program**

- Upon notification of an impending RFP or contract award, begin immediate collaboration with departmental personnel.
- Analyze departmental needs and designate approved and certified vendors to be used for contract compliance.
- Direct a fair share of Subcontracting dollars to the Small Business community for the purpose of meeting Federal requirements and expectations.
- After receipt of contract, maintain record of expenditures and report results as scheduled.

- Continually work with Department to address any contract related issues.

**Definitions:**

- Department - Principal Investigator, Lab/Contract Manager, Department Business Manager
- SPA – Sponsored Projects – Contract and Grant Officer
- SBC - Small Business Coordinator- Materiel Management designee responsible for creating and reporting Subcontract Plan results