

# University of Rochester Subcontracting Procedures and Guidelines for Small, Small Disadvantaged and Women-Owned Small Business

It is the policy of the US Federal government to place a fair proportion of its acquisitions (e.g., contracts, subcontracts) with Small Business (SB), Small Disadvantaged Business (SDB) and Women-Owned Small Business (WSB). Therefore, the University of Rochester, as a major Federal contractor also has obligations with respect to procurements to these organizations.

## Overview of UR Responsibilities

- to agree that in any contract received by the Federal government that exceeds \$25,000 that SB's, SDB's and WSB's will be utilized to the maximum practicable extent;
- that prior to accepting a Federal contract expected to exceed \$500,000 (\$1,000,000 for construction), to submit an agency-approved subcontracting plan. Contracts will subsequently be subject to periodic subcontracting reports (referred to as SF 294) to determine whether UR subcontracting goals are being met. Procedures for completing a subcontracting plan are outlined below;
- to submit a summary subcontracting report (SF 295) annually for University procurements. This report allows the government to determine the extent of University compliance on the basis of federal funds expended;
- to use its best efforts to license Federally-funded inventions to small business.

## Procurement Services' Responsibilities

- counsel, advise University Principal Investigators (PI's) and administrators on SB, SDB, WSB vendors and their commodities.
- review and sign completed subcontracting plans and reports (SF 294).
- formulate summary subcontracting report (SF 295).
- Program Administration duties, as defined in Federal Acquisition Regulation 52.219-9 and University submitted subcontracting plans.
- compile and provide the University Vendor Certification Report.
- assist Principal Investigator in resolving any discrepancies between subcontract goals and actual procurements.
- maintain subcontract plans and reports (SF 294, SF 295).

## ORPA's Responsibilities

- counsel, advise University administrators, PIs and Procurement Services on Federal requirements, deadlines and Federal Acquisition Regulations with respect to SB, SDB, and WSB procurement.
- liaison to Federal contracting officers and Federal agencies.
- ensure that SB, SDB, and WSB requirements are included in University research subcontracts, when necessary.
- establishment and maintenance of contract and subcontract award records.

## Principal Investigator's Responsibilities

- formulate subcontracting plan goals, based on proposed purchases and University report of SB, WSB and SDB concerns. Timely submission of subcontracting plan to Procurement Services for review and signature.
- timely notification to ORPA or Procurement Services when needing assistance with subcontracting plans/reports.
- completion of SF 294. Timely submission of completed SF 294 to Procurement Services for review and signature (allow 5 business days).
- submission of original, signed SF 294 to Contracting Officer and copy to ORPA.
- actively pursue meeting subcontract goals and resolving any discrepancies between subcontract goals and actual procurements.

## 1. Procedure for Completing Subcontracting Plan

It is necessary to submit a subcontracting plan for proposed contract funding expected to exceed \$500,000. As stated above, the Principal Investigator (PI) is responsible for the formulation of this plan, particularly the goals. University's Procurement Services and ORPA will provide assistance as needed.

The plan must be consistent with Federal Acquisition Regulation 52.219-9 and contain all the elements required by this clause. For ease of developing an acceptable plan, a partially-completed template is available from ORPA or Procurement Services, and can also be obtained from the ORPA Home Page at <http://www.rochester.edu/ORPA/>. A copy is also attached to this document as Appendix A.

The PI must complete the following items on the form:

• Identification Data: This section is self-explanatory.

• Item 2. Statement of Goals: The total estimated dollar value of all planned subcontracting should be obtained from the proposal budget by totaling all planned outside procurements, such as supplies, equipment, subcontracts, etc. Procurement Services will assist by providing a quarterly report of SB, SDB and WSB concerns by commodity grouping for the Statement of Goals. The PI must provide a listing of proposed purchases.

• Item 6. Reporting and Cooperation. The frequency of reporting (usually semi-annually) and address to whom the report should be sent may be obtained from the Request for Proposal, (or the PI can request ORPA to contact the agency for this information).

The information required in the remaining sections of the form has already been provided. The PI should forward completed forms to Procurement Services for signature. Signed forms will be returned to the PI for submission with the proposal, (or sent to ORPA at an agreed upon later date for submission to the Contracting Officer).

## **2. Procedure for SB & SDB Subcontracting Reports**

Awarded contracts expected to exceed \$500,000 require a Subcontracting Report for Individual Contracts (SF 294) to be submitted to the Contracting Officer semi-annually during the period of the project. A separate final report is required upon completion. Negative reports are required when there has been no subcontracting activity. The SF 294 does not require reporting on other vendors (i.e., large business, other Universities). The SF 294 is completed by the PI and will be signed by Procurement Services. Procurement Services will keep a signed copy and return the original to the PI. The PI sends the original report directly to the Contracting Officer and a copy of the report to ORPA.

## **3. Summary Subcontracting Report**

The Summary Subcontracting Report (SF 295) collects subcontract data from Federal contract and subcontracts on a university-wide basis. As indicated above, this report is prepared and submitted by Procurement Services.