



U.S. Small Business
Administration



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SBA's Small Business Learning Series

Surveillance Review

Not intended for public distribution

Hosts

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Welcome to “SBA Virtual Learning 2024”

1. Questions answered during the final 10 minutes.
2. Technical problems: Contact your IT admin who manages Teams settings for your organization.
3. Captioning available for this presentation.
4. We cover the “**SBA Quick Reference**” as time allows.
5. For more SBA training visit the SBA Learning Center website <https://www.sba.gov/tools/sba-learning-center/search/training>

The APEX Accelerator Program

The APEX Accelerators are a vital resource partner.

- APEX Accelerator have a name change and a new website.
- Its new name is the National APEX Accelerator Alliance.
The new website is <https://www.napex.us/>
- Recordings have been posted to a new URL and they are current to November 6, 2024.
- The website recordings are at:
<https://www.napex.us/category/sba-webinars/>

Small Business Administration YouTube Page

SBA YouTube page posts past “First Wednesday” programming at links below.

FY2023

- October 5, 2022 – 8(a) Business Development Program Updates: <https://youtu.be/Yl5Sp0dP1aE>
- November 2, 2022 – Surety Bond Guarantee Program: <https://youtu.be/QlZJiMLcc5o>
- December 7, 2022 – Subcontracting Program: <https://youtu.be/gMaaeGl8CBs>
- January 4, 2023 – Surveillance Review Program: <https://youtu.be/euUX4Jv6kRI>
- February 1, 2023 – HUBZone Program: <https://youtu.be/YGnS8e6idCc>
- March 1, 2023 – The Mentor Protégé Program: <https://youtu.be/A9KbCm4FP1c>
- April 5, 2023 – Non-Manufacture Rule (NMR): <https://youtu.be/AqwYMWoe9f0>
- May 3, 2023 – Size Program: https://youtu.be/45WZ_oPb1GY
- Jun 7, 2023 – Legislature and Regulatory Updates: <https://youtu.be/ljx9IajQJNY>
- July 5, 2023 – Market Research: [SBA First Wednesday Market Research - July 13, 2023](https://youtu.be/SBAFirstWednesdayMarketResearch-July13-2023)
- August 2, 2023 – Service-Disabled Veteran Owned Program (SDVOSB): <https://youtu.be/QxcxJISRhnw>

FY2024

- October 4, 2023 - Certificate Of Competency: <https://youtu.be/VDZ-uuCLlWw>
- November 1, 2023 - 8(a) Program Updates: <https://youtu.be/6fN3dK0EShs>
- December 6, 2023 - Timber Program : <https://youtu.be/sa29iONBtfk>
- January 3, 2024 - Compliance Reviews: https://youtu.be/WmZn_oa13-o
- February 7, 2024 – Limitations on Subcontracting: <https://youtu.be/fYtGi6zhjXM>
- March 6, 2024 – Mentor Protégé Program: <https://youtu.be/ULmCzTe4c04>
- April 3, 2024 – Women-Owned Small Business Program: <https://youtu.be/E-R17-5lBn4>
- *May 9, 2024 - Participation Plans & Subcontracting Plans: <https://youtu.be/6OBLwxqdoZM>
- June 5, 2024 – Legislative and Regulatory Update: <https://youtu.be/iajaPOhtgHI>
- July 11, 2024 – HUBZone: <https://youtu.be/MJ9iL8dTOmk>
- August 7, 2024 – Market Research: <https://youtu.be/zg4ceGaqveE>

FY2025

- October 2, 2024 – SBA Size and Affiliation: <https://youtu.be/il5o6YEONc0>
- November 6, 2024 - Procurement Center Representative - An advocate, A Resource: https://youtu.be/_eJwz2S934Y
- December 4, 2024 – Small Business Plans (Pre-Award): <https://youtu.be/WQ4z3WRrUu8>
- January 16, 2025 - Small Business Plans (Post-Award): <https://youtu.be/B2yJIACfq6w>
- February 5, 2025 – Other Transaction Authority (OTA): <https://youtu.be/Hd10cTVnlfo>
- March 5, 2025 – Surveillance Review:

FIRST WEDNESDAY VIRTUAL LEARNING SERIES

FY 2025 SCHEDULE

1:00 to 2:00 PM Central Time

2:00 to 3:00 PM Eastern Time

FY 2025	Date	Topic
1	October 2, 2024	SBA Size and Affiliation
2	November 6, 2024	PCR: An Advocate, A Resource
3	December 4, 2024	Subcontracting Plans (Pre-Award)
4	*January 16, 2025	Subcontracting Plans (Post-Award)
5	February 5, 2025	Other Transaction Authority (OTA)
6	March 5, 2025	Surveillance Review
7	April 2, 2025	TBA
8	May 7, 2025	TBA
9	June 4, 2025	TBA
10	July 2, 2025	TBA
11	August 6, 2025	TBA

The program schedule is for information only and is subject to change

*Schedule Revisions may occur Due to Holiday or Programming Conflict

One Continuous Learning Point

- Self-service process for one CLP of credit: Many of you want to receive credit for today's training. You will be glad to know that today's training is worth one CLP. The slide presentation will include the training certificate on Slide 10. Fill, download the training certificate, copy and submit it through regular channels.
- If you listen in groups and you want all attendees to be included on the future mailing list, send email addresses of participants in an excel document to sbalearning@sba.gov.

“SBA 1st Wednesday Virtual Learning 2025”

This Certificate is awarded to

Insert Your Name Here

For completion of

Surveillance Review

This training seminar may be credited towards “Continuous Learning Points” as described in OFPP Policy Letter 05-01. Recommendation of One CLP.



03/05/2025

Date

Dr. Thomas W. Krusemark
Acting Director, Area IV
SBA Office of Government Contracting

Today's Speaker(s)

Valerie (Val) J. Coleman
National Program Manager
U.S. Small Business Administration



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Administration

What is a Surveillance Review (SR)?

- Assessment of a Procurement Center's (PC) compliance in executing its Small Business (SB) program.
- Authority
 - Small Business Act
 - FAR 19.402(c)(5) - "Conducting periodic reviews of the contracting activity to which assigned to ascertain whether it is complying with the small business policies in this regulation."

Purpose of a SR

- Evaluate the PC's performance on attaining its assigned goals
- Evaluate the compliance with FAR requirements and agency supplements affecting the small business program
- Evaluate agency or local policy impacting small business opportunities
- Evaluate compliance with requirements and authorities for award of 8(a) contracts
- Evaluate compliance with any other relevant agreements between SBA and the PC
- Identify improvements to support SB participation in the PC's acquisition process
- Identify training, and/or technical assistance to the PC to enable it to improve its ability to provide opportunity with small business concerns
- Identify best practices that the PC is using that could be used with other agencies

Selection of Sites – not all inclusive

- Any PC who received a marginally satisfactory in a previous SR
- PC who has not made goals
- Request of OSDDBU/Director OSBP, other agency official, SBA official (PCR, Area Director)
- Top 300
- Change in Small Business Office leadership
- Has not had a review in the last 5 years

Pre-SR Process

- Letter to OSDBU or Director, Small Business Program
- Copy to Area Director where SR is to be conducted
- Area Director assigns Team Lead and Team members
 - BOS from District Office
- Team Lead negotiates dates for review & discusses how files will be retrieved
- Program Manager, Prime Contracts conducts a pre-SR training for all PCs involved in a SR.
- Area Director sends formal notification of SR
 - Preparation Checklist and Request for Information
 - 45-60 days in advance of date negotiated
- Other issues

Checklist & RFI

Instructions

Please submit the following information and documentation requested in electronic form with a hard copy to the SR Team Leader's email address: _____

Information should be submitted in the same order as it appears on this checklist.

Information required for the following periods: Items 1 – 3: FY 2022 through FY 2025 year-to-date.

1. **Contract Action Reports (CAR) submitted to Federal Procurement Data System – New Generation (FPDS-NG) over the SAT to include the following (can be formatted into an electronic format):**
 - a. **Contractor Name**
 - b. **Contract Number**
 - c. **Solicitation Number**
 - d. **Award Amount**
 - e. **Award Date**
 - f. **Business Size**
 - g. **Type of Contract**
 - h. **Item Description**
 - i. **NAICS Code**
 - j. **Synopsis Code**
 - k. **Type of Set-Aside**
 - l. **Subcontracting Plan Information**

2. Supply the following information for the same FYs as noted above:

- a. A list of contracts terminated for default or convenience.
- b. A list of contracts for which contract administration functions has been retained in-house.
- c. A list of GAO, Board of Contract Appeals, and direct protests to the agency/command, noting the name of the protesting firm, the solicitation/contract number, the reference number (GAO file number), and the status of the protest (dismissed, denied in whole or part, open).

3. General Information

Name of Procurement Center (PC):

Department/Agency/Office Code:

Mailing Address:

Physical Address (if different):

City, State, Zip:

PC Website:

Mission:

Typical Products/Services Acquired:

Head of PC:

Address (if different from above):

Phone:

Email:

Director of Contracting:

Address (if different from above):

Phone:

Email:

Small Business Specialist (SBS):

Address (if different from above):

Phone:

Email:

Small Business Technical Advisor:

Address (if different from above):

Phone:

Email:

Credit Card Coordinator:

Address (if different from above):

Phone:

Email:

4. **Overview of Small Business Awards**– If procurement center goals are assigned, please complete the below with those goals and achievements. However, if no goals have been assigned to the procurement center, please complete the below with agency goals and achievements.

Are the below your procurement center goals and achievements? Please confirm.

FY 2024	Total (\$M)	SB	SDB	WOSB	HUBZone	SDVOSB
% Goals						
\$ Achieved						
% Achieved						

5. **Background & Management of the Small Business Program**

- a. Provide an organizational chart.
- b. Does the PC have a Small Business Professional or Specialist formally appointed by an appropriate authority, such as the Office of Small Business Programs, Office of Small & Disadvantaged Business Utilization (OSDBU), or Head of PC? Provide a copy of the appointment document. FAR 19.201(d)
- c. Who does the SBS report directly to? List full name and title.
- d. How is the head of the PC active in implementing an effective small business program? Please describe. FAR 19.201(b)
- e. Discuss engagement with the PCR to include all reasonably obtainable contract information within their security clearance. FAR 19.402(b)

6. **Regulatory Compliance**

a. **Acquisition Planning**

- 1) Are all pre-solicitation documents available to your SBS to assist you in procurement planning? Discuss the method and effectiveness of any advance procurement planning as it relates to small business. If applicable, DFARS PGI 253.219-70 (the instructions for the DD 2579 state they need to see these documents).
- 2) Describe your Contracting Officers (COs) methodology for market research to make every reasonable effort to solicit small business concerns. FAR 19.202-2

SR Process

- **Entrance briefing** – not more than 1 week before beginning of review - virtual
- **Review of Files – General Files & 8(a) awards – virtual/in person/hybrid**
 - Interviews of Contracting Officers/Specialist, SBS (virtual/in-person)
 - Acquisition Planning
 - Acquisition Review & SB Program – long section
 - Publicizing Contract Actions
 - Subcontracting
 - Other Small Business program issues – which includes COC, Size, Protest, Misc.
 - Clauses
- **Exit Briefing** – within 1 week of completion of review of files - virtual

Post SR Process

- **Report written along with a cover letter**
 - Findings vs. Recommendations
 - Best Practices
 - Proposed rating
 - Outstanding
 - Highly Satisfactory
 - Satisfactory
 - Marginally Satisfactory
 - Unsatisfactory

- **Sent to Program Manager, Prime Contracts Program for review**

- **Director, Government Contracting signs and gives rating**

- **Letter and report sent to OSDBU/Director of Small Business Programs**
 - “cc” PC individuals

- **Corrective Action Plan - 45 days after SR report received**

Follow-up SRs (FuSR)

➤ **1st FuSR**

- Conducted in the 2nd FY following full review
- PCs that received a marginally satisfactory
- Led by the Area Director where the PC is located and includes PCR that covers the PC
- 1 day review
- Corrective Action Plan
- Letter and report to OSDBU/Director of Small Business Programs

➤ **2nd FuSR**

- PC received another marginally satisfactory during the FuSR
- Led by Director, Government Contracting or his designee
- 1 day review
- Corrective Action Plan
- Letter and report to OSDBU/Director of Small Business programs if Satisfactory. If still marginally satisfactory, letter and report goes to Secretary/Administrator of Agency

2024 SR Stats

FY 24 SRs

➤ 15 Different Agencies

- DOD (19)
 - Air Force (4)
 - Army (10)
 - Defense Logistics Agency (1)
 - Navy (1)
 - 4th Estate (3)
- Energy – (2)
- EPA
- NARA
- SBA
- Social Security
- Smithsonian
- Treasury – (2)
- USDA (Timber)
- VA - (2)

FY 2024 SRs

- **All SRs completed, signed and sent to OSDBU/Director, Small Business Programs**
- **Cover letter requested acknowledgement of report**
- **Corrective Action Plans due within 45-90 days of letter & report**
 - Extensions can be given if requested

Trends

- **8(a) program** –offer and acceptance letters; clauses not being included; contracts/mods not being forwarded to SBA
- **Subcontracting** – Plans not received from prime contractor; waivers not in file if no subcontracting opportunities; not being reviewed by SBS and PCR; not becoming a material part of the contract; not forwarded to SBA; eSRS reports not being submitted and/or accepted/rejected by PC
- **Limitations on Subcontracting** – Not being done
- **Small Business Coordination Forms** – PCRs not seeing these forms as required; not being forwarded to PCR if an acquisition strategy changes after they have signed
- **Clauses** – Required SB clauses missing
- **Goals** – PCs get the same goals from their HQ even though for the past 5 years they have exceeded them by 3 to 4 times (As an example – a PC achieves 20% on SDB for several years in a row, but their goal never changes).

Recommended Practices for Small Business Program (SBP) Performance Optimization

General

1. Engagement of the SBS early and throughout the procurement lifecycle by the contracting team (goaling, reporting, SB outreach, strategy, etc...)
2. Regular formal and informal training (courses, workshops, etc.. of procurement personnel, to include use of SBA training opportunities)
3. Involvement of procurement professionals at outreach events (Industry days, program information presentations, etc...)
4. Transparent requirements forecasting and planning within all the procurement professionals at a PC/Agency
5. SBP goal establishment includes both OSDBU leadership and local procurement professionals' engagement and collaborative communication
6. Consultative services to SB on how best to use an Agency procurement vehicles
7. Pre-Briefing between SBA SRT and the Agency SBP officials to enable understanding of the review and the local SBP administration
8. Set up shared folder contracting Data analytics and information sets (contract performance data, market demographics and capabilities, etc..) for use between procurement professionals
9. Expanded use of market research to ensure SB contracting opportunities are optimized for set-asides

Subcontracting

1. Creation of a standardize checklist for the review of Subcontracting Plans (DOD's checklist can used as an example)
2. Written communication, post award, with prime contractors on eSRS reporting requirements
3. Standardized operating procedures, policy, practices captured and published in Subcontracting Plan SOP

FY 25 SRs

➤ **13 Different Agencies**

- DOD (21)
 - Air Force (5)
 - Army (8)
 - Navy (6)
 - 4th Estate (2)
- Energy
- GSA
- HHS
- NASA
- NSF
- Treasury
- USDA (Timber)
- VA - (2)

FY 2025 SRs

➤ **Items to be worked on**

- Ability to access contract files – electronic
- Security clearances

➤ **Items completed**

- Updated individual contract file & 8(a) checklists
- Updated SR report template along with RFI/Checklist
- List of Recommended Practices

➤ **Selection of 2025 SRs has been completed.**

➤ **Notification Letters to OSDBU/Director, OSBP have been sent out. (2/7/25)**

Questions?

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