

SURVEILLANCE REVIEWS

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Surveillance Reviews (SR)

- ▶ A comprehensive assessment of a Procurement Center's (PC) compliance in executing its small business program and its effectiveness.
- ▶ To evaluate the program's impact on small businesses
- ▶ To enable SBA to recommend changes to improve small business participation at the PC



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Types of SRs

- ▶ Initial – 3 days
 - 2–3 PCRs
 - Possible CMR
 - 8(a) District Office Staff
- ▶ Follow-Up – 1 day (Received less than satisfactory the previous fiscal year)
 - Area Director (unless 2nd follow-up and then Director of Government Contracting has the lead)
 - PCR
 - Program Manager, Prime Contracts (as required/needed)
- ▶ Natural Resources – 3 days
 - Director
 - Industrial Specialists



SR Process

- Activities Chosen
- Notification
- Interviews
- Entrance Briefing
- On-site review
- Exit briefing
- Formal report



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The SR Report

- ▶ 5 Parts
 - SR Team Members
 - Dates, Scope of Review & Rating
 - Results of the SR (Findings/Corrective Actions)
 - Summary of Corrective Actions
 - Listing of Contract Files Reviewed



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SR Categories

In performing a SR, the following compliance categories & issues have been identified:

- Overview of Small Business Awards
- Small Business Program Management
- 8(a) Contract Review Process
- Women-Owned Small Business Set-Asides
- Acquisition Planning
- Subcontracting
- Other Small Business Issues
- Regulatory Clauses/Provisions
- Bundling
- Limitations on Subcontracting
- Any other special emphasis areas
- Best Practice Recommendations to Improve Performance



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Frequent Findings Requiring Corrective Action

- ✓ Misaligned SB Director/HCA Reporting
 - ✓ Reporting to Contracting Officer
- ✓ Inadequate or unrealistic goals
 - ✓ Goals exceeded by wide margins or
 - ✓ Agency pass down of its goals with no regard to demographics causing buying activity to fail
- ✓ PCR engagement
 - ✓ Lacking coordination records
 - ✓ PCR not engaged in Acquisition Strategy Reviews
 - ✓ PCR not reviewing subcontracting plans



Frequent Findings Requiring Corrective Action

- ✓ WOSB Program Execution
 - ✓ Improper NAICS for WOSB/EDWOSB set-asides
- ✓ 8(a) program
 - ✓ Failure to notify SBA
- ✓ Subcontracting
 - ✓ Plans missing
 - ✓ Primes not submitting reports in eSRS
 - ✓ Agencies not accepting/rejecting reports in eSRS
 - ✓ Lack of enforcement of Limitations on Subcontracting
- ✓ Training
 - ✓ Lack of Training on Small Business Programs
- ✓ Missing regulatory SB Solicitation clauses



Questions??

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