SURVEILLANCE REVIEWS

Valerie J. Coleman
Program Manager, Prime Contracts
Office of Government Contracting
U.S. Small Business Administration
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
**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
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
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
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-aside
- 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??

Valerie J. Coleman
Program Manager, Prime Contracts
Office of Government Contracting
U. S. Small Business Administration
281–245–4777
valerie.coleman@sba.gov