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
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-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??

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