



# DoD Small Business Training Week

## Post-award Functions

### **“Evaluating Subcontracting Performance in Contractor Performance Assessment Reporting System (CPARS)”**

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# Overview

- ✓ **What is CPAR**
- ✓ **Latest CPAR Small Business Updates**
- ✓ **What is rated (when applicable)**
- ✓ **What does it say About Small Business CPARS Small Business Entry**
- ✓ **Small Business Professions Review Entries in CPARS**
- ✓ **What Should Small Business Professionals Look for in CPARS**
- ✓ **Sample CPAR Review Activity**



# CPARS FOR SMALL BUSINESS PROFESSIONALS





# What is CPARS?

- **CPARS (Contractor Performance Assessment Reporting System) is a web-enabled application that collects and manages a library of automated contractor performance data.**
- **FAR 42.1502 covers using CPARS.**
- **CPARS and the Past Performance Information Retrieval System (PPIRS) are distinct systems.**
- **CPARS is used to assess a contractor's performance. The assessment data is available through PPIRS.**
- **PPIRS should only be used in source selection.**



# CPARS – Small Business Utilization

- **New evaluation area more comprehensive assessment of contractor's utilization of SB – rather than just the achievement of goals**
- **Meets the past performance evaluation requirements included in FAR 42.15 and 19.7 and DFARS 215.305**
- **Assesses compliance with terms and conditions of the contract for Small Business participation**
- **Assesses compliance with FAR 52.219-8 & 52.219-9**
- **Assesses compliance w/individual subcontracting plans**



# CPARS UPDATES AS OF AUGUST 2017

- **Paragraph A3.24** has been updated to change “Small Business Utilization” to “Small Business Subcontracting”.

**Paragraph A3.31** and subparagraphs have been updated to change “Small Business Utilization” to “Small Business Subcontracting”.

**Small Business Utilization is used as rating language.**



# CPARS UPDATES SMALL BUSINESS

## Updated: August 2017

### 2.12 Subcontractor Evaluations, Guide Page 9

- CPARs evaluations are not completed for subcontractors.
- CPAR evaluation of a contractor's performance should include information on the ability of a prime contractor to manage and coordinate subcontractor efforts
- Compliance with statutory requirements of the Small Business Subcontracting Program. According to FAR 42.1502, past performance evaluations shall include an assessment of contractor performance against, and efforts to achieve, the goals identified in the small business subcontracting plan when the contract includes the clause at 52.219-9, Small Business Subcontracting Plan.

# CPARS UPDATES AS OF AUGUST 2017



**A3.24 Small Business Subcontracting. Answer the following questions:**

- **Does this contract include a subcontracting plan?**
- **Date of last Individual Subcontracting Report (ISR) / Summary Subcontracting Report (SSR)**





**A3.30.2 Subcontract Management. Assess the contractor's success with timely award and management of subcontracts.**

- **Assess the prime contractor's effort devoted to managing subcontracts and whether subcontractors were an integral part of the contractor's team.**
- **Consider efforts taken to ensure early identification of subcontract problems and the timely application of corporate resources to preclude subcontract problems from impacting overall prime contractor performance.**



# CPARS SMALL BUSINESS SUBCONTRACTING

## A3.30.2 Subcontract Management (CON'T)

- **Consider efforts taken to ensure prompt subcontractor payment**
- **Assess the prime contractor's managing of subcontractors to ensure compliance with labor and safety standards at the subcontract level**
- **If the contract is set aside for small business, assess the contractor's compliance with any limitations on subcontracting**



# CPARS SMALL BUSINESS SUBCONTRACTING

## **A3.31 Small Business Subcontracting.**

**FAR Subpart 19.7 and 15 U.S.C. 637 contains statutory requirements for complying with the Small Business Subcontracting Program. Assess whether the contractor provided maximum practicable opportunity for Small Business (including Alaska Native Corporations (ANCs) and Indian Tribes) (including Small Disadvantaged Businesses (which also includes ANCs and Indian Tribes), Women Owned Small Businesses, HUBZone, Veteran Owned, Service Disabled Veteran Owned Small Business, and ANCs and Indian Tribes that are not Small Disadvantaged Businesses or Small Businesses) to participate in contract/order performance consistent with efficient performance of the contract/order.**



# CPARS

## SMALL BUSINESS SUBCONTRACTING

**A3.31.1 Assess compliance with all terms and conditions in the contract/order relating to Small Business participation (including FAR 52.219-8, Utilization of Small Businesses and FAR 52.219-9, Small Business Subcontracting Plan (when required)).**

**Assess any Attachment 3 Instructions for Completing a CPAR A3-16 small business participation goals which are stated separately in the contract/order.**

**Assess achievement on each individual goal stated within the contract/order or subcontracting plan including good faith effort if the goal was not achieved.**



# CPARS - COMPREHENSIVE SMALL BUSINESS SUBCONTRACTING

**A3.31.2 It may be necessary to seek input from the Small Business specialist or Contracting Officer in regards to the contractor's compliance with these criteria. For DoD in cases where the contractor has a comprehensive subcontracting plan, request DCMA Comprehensive Subcontracting Plan Manager to provide input including any program specific performance information.**



# CPARS - COMMERCIAL SMALL BUSINESS SUBCONTRACTING

**A3.31.3 For contracts/orders subject to a commercial subcontracting plan, the Small Business Subcontracting factor should be rated “satisfactory” as long as an approved plan remains in place, unless liquidated damages have been assessed by the contracting officer who approved the commercial plan (see FAR 19.705-7(h)). In such case, the Small Business Subcontracting area must be rated “unsatisfactory”.**



# CPARS – Commercial Subcontracting Plans

**For contracts subject to a commercial subcontracting plan:**

the Utilization of Small Business factor should be rated “green” as long as an approved plan remains in place unless liquidated damages have been assessed by the contracting officer who approved the commercial plan. In such case, the Utilization of Small Business area must be rated “red”.

**This area must be rated for all contracts and task orders that contain a small business subcontracting goal.**



# CPARS

## SMALL BUSINESS SUBCONTRACTING

**A3.30.4** This area must be rated for all contracts and task orders that contain a small business subcontracting goal.

**A3.31.5** Ratings will be in accordance with definitions described in Attachment 2, "Evaluation Ratings Definitions For The Small Business Evaluation Factor when 52.219-9 is used.

**A3.31.6** Evaluations of the small business subcontracting are required for contracts and orders placed against basic ordering agreement (BOA), blanket purchase agreement (BPA), or GWAC/MAC if a subcontracting plan is required.





# **CPARS SMALL BUSINESS SUBCONTRACTING**

**Evaluations of small business subcontracting for single-agency task orders and delivery orders are required when the contracting officer determines, in accordance with FAR Subpart 42.1502(d), it is more appropriate to complete a CPAR on each task/delivery order rather than completing a consolidated CPAR for the indefinite delivery contract and each exercised option year period. Execution of any subcontracting plan may be addressed in the narrative section for the Assessing Official.**

# CPARS



# SMALL BUSINESS SUBCONTRACTING

**Although FAR 19.705-2(e) states a contract may have no more than one subcontracting plan, performance against small business subcontracting may be more appropriately managed through individual task orders to achieve overall contract small business subcontracting goals as indicated in preceding paragraph.**



# CPARS

## SMALL BUSINESS SUBCONTRACTING

**Although paragraph 2.1.1 requires a CPAR to be completed for each order placed against multi-agency indefinite delivery vehicle (IDV), the small business subcontracting assessment must be completed by the agency that awarded the contract unless the contract ordering instructions allow for separate small business subcontracting goals to be incorporated into each order.. Multi-agency IDVs include federal Supply Schedules (FSS), Government Wide Acquisition Contracts (GWAC), and Multiple Agency Contracts (MAC).**



# JOINT VENTURES

## **2.4 Joint Ventures (FAR 4.102)**

**CPARs should be prepared on contracts/orders for joint ventures. When a joint venture is formed, a unique DUNS number is used which is different from those of the individual companies that formed the joint venture. A single CPAR will be prepared for the joint venture using that DUNS. If there is a teaming arrangement on a contract where a specific joint venture is not formed, the CPAR is only prepared on the specific prime contractor identified on the contract. All other team members are considered subcontractors to the prime contractor. See Section 2.10 to address subcontractor performance.**



# **CPARS: Contractor Team Arrangements (CTAs)**

- **As stated in FAR 9.6, Contractor Team Arrangement is an arrangement in which**
  - (1) two or more companies form a partnership or joint venture to act as a potential prime contractor;**
  - or**
  - (2) a potential prime contractor agrees with one or more other companies to have them act as its subcontractors under a specified Government contract or acquisition program.**
- **When evaluating CTAs for orders placed against Federal Supply Schedules (FSS), evaluate the team member with most of the revenue..**



# CPARS: SMALL BUSINESS SUBCONTRACTING

**A3.24 Small Business Subcontracting. Answer the following questions:**

- **Does this contract include a subcontracting plan?**
- **Date of last Individual Subcontracting Report (ISR) / Summary Subcontracting Report (SSR)**



# CPARS Benefits

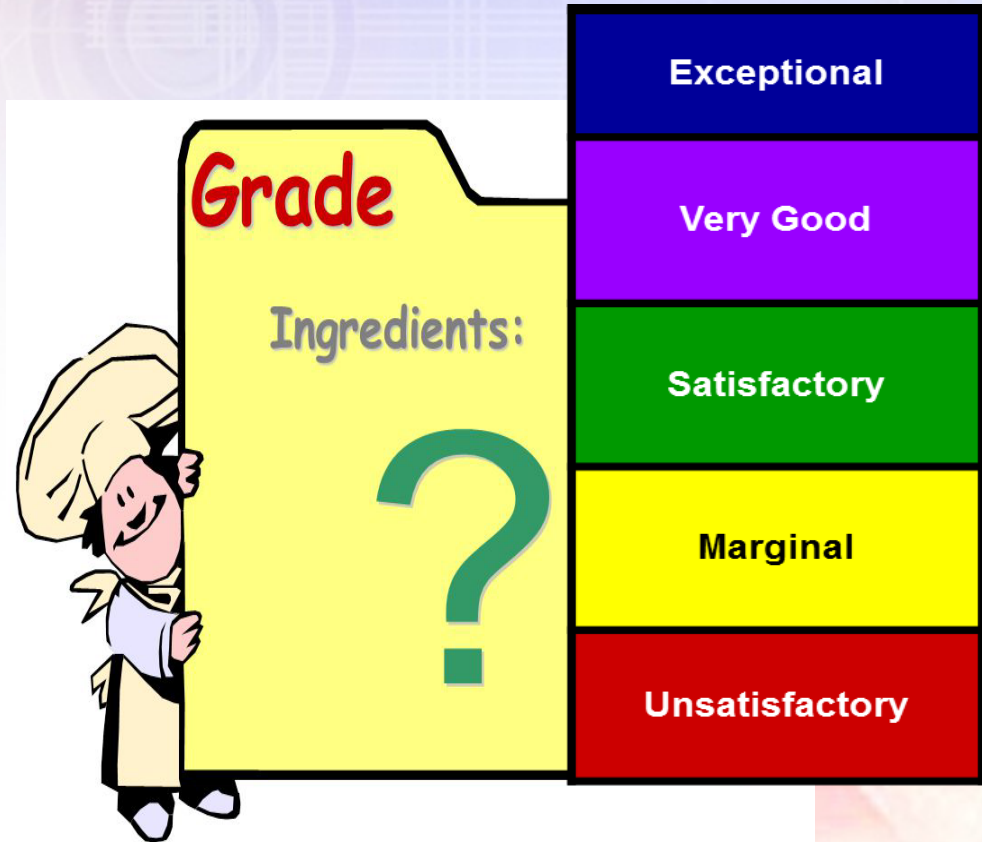
- ✓ Support best-value source selection decisions
- ✓ Provide up-to-date documentation of a contractor's ability to meet contract requirements
- ✓ Motivate improved performance
- ✓ Facilitate Government-contractor communications





# CPARS Small Business Entry

What information would you expect to find in a CPARS small business entry?







# Elements Evaluated

- **Quality**
- **Schedule**
- **Cost Control**
- **Management**
- ✓ **Small Business**
- **Regulatory Compliance**
- **Other Areas**





# REVIEWING CPAR ENTRIES

- **Was the contractor in compliance with the small business subcontracting requirements of the contract (subcontracting plans and binding SBPCDs)?**
- **Does the narrative provide adequate supporting information?**
- **Does the CPARS Small Business Utilization rating appear justified?**
- **Was any information missing?**



# Ratings and Narratives

**Narratives are the Most  
Important Part of the CPAR!**



# Rating Areas

## **Small Business Subcontracting**

- ✓ **Compliance with Terms and Conditions for Small Business Participation**
- ✓ **Achievement of Small Business Subcontracting Goals**
- ✓ **Good Faith Effort to Meet Small Business Subcontracting**



# CPARS Small Business Utilization Tab



**CPARS - Systems**

Contract/Schedule Number: N0001905G0008 [?](#) Order Number: 0011  
*(Click on a tab below to view/enter the related information; fields identified with \* are required)*

**Contractor Name/Address** | **Contract Information** | **Misc Information** | **Small Business Utilization** | **Ratings** | **Assessor**

**Small Business Utilization** [?](#)

\* Does this contract include a subcontracting plan? (Select)

Is small business subcontracting under this contract included in a comprehensive small business subcontracting plan? N/A

Is small business subcontracting under this contract included in a commercial small business subcontracting plan? N/A

Date of last Individual Subcontracting Report (ISR) / Summary Subcontracting Report (SSR): N/A

Should be "Yes"

Yes, No, or N/A

Yes, No, or N/A

Contract Complete, N/A, or Bi-Annual date (Provided by the eSRS)



# CPARS SYSTEM

## CPARS - Systems

Contract/Schedule Number: N0001905G0008 Order Number: 0011

(Click on a tab below to view/enter the related information; fields identified with \* are required)

**Contractor Name/Address** | **Contract Information** | **Misc Information** | **Small Business Utilization** | **Ratings** | **Assessor**

### Small Business Utilization

\* Does this contract include a subcontracting plan? (Select)

Is small business subcontracting under this contract included in a comprehensive small business subcontracting plan? N/A

Is small business subcontracting under this contract included in a commercial small business subcontracting plan? N/A

Date of last Individual Subcontracting Report (ISR) / Summary Subcontracting Report (SSR): N/A

Yes or No

Yes, No or N/A

Yes, No or N/A

(Click on a tab below to view/enter the related information; fields identified with \* are required)

**Contractor Name/Address** | **Contract Information** | **Misc Information** | **Small Business Utilization** | **Ratings** | **Assessor**

18. \* Evaluate the following Areas: (rate or select N/A for all major areas, a - e)

a. Quality  b. Schedule  c. Cost Control  d. Management  e. Small Business  f. Other Areas

### e. Utilization of Small Business

Past Color: N/A Color: (Select) Trend: N/A

20. Assessing Official Narrative (15189 characters remaining for all Assessing Official Narrative fields)

Contract Complete  
N/A  
Bi-Annual date-Mar or Sep  
(This information comes from the eSRS)

Standard CPAR rating  
(required when answering "Yes"  
to Does this contract include a  
subcontracting plan?)



# CPAR SMALL BUSINESS UTILIZATION

*(Click on a tab below to view/enter the related information; fields identified with \* are required)*

[Contractor Name/Address](#) [Contract Information](#) [Misc Information](#) [Small Business Utilization](#) [Ratings](#) [Assessor](#)

18. \* Evaluate the following Areas: ? (rate or select N/A for all major areas, a - e)

[a. Quality](#) [b. Schedule](#) [c. Cost Control](#) [d. Management](#) [e. Small Business](#) [f. Other Areas](#)

e. Utilization of Small Business ?

Past Color: N/A      Color: (Select) v      Trend: N/A v

20. Assessing Official Narrative (15189 characters remaining for all Assessing Official Narrative fields)

Standard CPARS rating

Exceptional
Very Good
Satisfactory
Marginal
Unsatisfactory

Supporting Narrative



# CPAR NARRATIVE

- **The rating given for CPARS Small Business Utilization should be supported by the narrative statement. This is a critical element of the CPARS entry because it provides the justification for the rating, and also provides details on small business subcontracting plan compliance.**
- **This statement supports the Exceptional rating because it addresses:**
  - ✓ Quantifiable Accomplishments
  - ✓ Comparison to the Small Business Subcontracting Plan Goals
  - ✓ Type of Work Performed by SB
  - ✓ Timely eSRS reporting



# CPAR RATINGS



Rating	Subcontracting Plan	ISR/SSR	Benefits/Impacts
<b>Exceptional</b>	<b>Exceeded all statutory goals or goals as negotiated</b>	<b>Accurate and Timely</b>	<b>Multiple Significant Events of Benefit</b>
<b>Very Good</b>	<b>Met All Statutory goals or goals as negotiated</b>	<b>Accurate and Timely</b>	<b>Significant Event of Benefit</b>
<b>Satisfactory</b>	<b>Good-Faith Effort To all negotiated subcontract goals in the various socioeconomic category</b>	<b>Accurate and Timely</b>	<b>Minor Problems or Major Problems with Corrective Action addressed or taken</b>
<b>Marginal</b>	<b>Deficient in Meeting Key Plan Elements</b>	<b>Inaccurate; Untimely</b>	<b>Corrective Action Plan Required and identify the significant event and how it impacted SB utilization</b>
<b>Unsatisfactory</b>	<b>Noncompliant; Uncooperative</b>	<b>Inaccurate; Untimely</b>	<b>Multiple Significant Problems; Liquidated Damages</b>

# CPAR RATINGS



- **Ratings are same as other areas assessed but definitions of ratings differ**
- **Dark Blue/Exceptional**
- **Purple/Very Good**
- **Green/Satisfactory**
- **Yellow/Marginal**
- **Red/Unsatisfactory**
- **SB Utilization also added to ACASS and CCASS**
- **For CPARS guide and other information go to:  
<http://www.cpars.csd.disa.mil/cparsmain.htm>**



# Sample Narrative Review

## Statements to Avoid

- ✘ Outside Contract Scope
- ✘ In Our Opinion
- ✘ It Appeared
- ✘ We Believe
- ✘ We Hope
- ✘ We Were Not Happy
- ✘ We Did Not Like
- ✘ We Think
- ✘ I know this company personally





# Small Business Subcontracting

- **Evaluate When Subcontracting Plan is Required**
  - **Contracts**
  - **Orders Against BOAs, BPAs, GWACs, MACs**
  - **Single-Agency Task/Delivery Order When Contracting Officer Determines Appropriate**
- **For Multi-Agency Indefinite Delivery Vehicles, Evaluated by Agency that Awarded Contract Unless Separate Small Business Subcontracting Goals in Each Order**
  - **Includes FSS, GWACs, MACs**



# SBTW Activity: Let's Analyze a CPARS Entry

- ✓ SBPs might be called upon to provide advice and counsel on small business matters related to CPARS rating inputs, or they might be called upon when performance issues arise that could adversely affect CPARS ratings for small businesses





# Sample Contract Subcontractor Evaluation in CPARS

## **Small Business Subcontracting – Rating: Exceptional**

The contractor provides maintenance and support on IT. They tried to get a few subcontractors on this project and honestly, they did the best they could.

**Narrative Sufficient?**

**Yes or No**



# Sample Subcontractor Contract Evaluation

**NOT Sufficient**

**Small Business Subcontracting –  
Rating: Exceptional**

The contractor provides maintenance and support on IT. They tried to get a few subcontractors on this project and honestly, they did the best they could.

Missing:

- Quantifiable Accomplishments
- Comparison to Plan Goals
- Type of Work Performed by Small Business

Delete:

- Personal opinions/bias





# Sample CPAR Narrative

## Element Evaluated: Small Business Subcontracting

### Small Business Subcontracting – Rating: Exceptional

The Contractor exceeded their 27% small business goal by 2 percentage points and met all of the other subcontracting goals. The Contractor awarded a subcontract to a small business for mission critical information technology for this program. The Contractor conducted three outreach events which directly led to award of subcontracts to Service Disabled Veteran Owned small businesses and HUBZone small businesses. The Contractor exceeded the small business participation requirements of the contract that required the small business to be used for 25% of the R&D portion of the contract, by awarding 50% of this requirement to small business. The Contractor submitted all required reports on time.

**Narrative Sufficient? Yes or No**





# Sample CPAR Narrative

## Element Evaluated: Small Business Subcontracting

### Small Business Subcontracting – Rating: Exceptional

The Contractor exceeded their 27% small business goal by 2 percentage points and met all of the other subcontracting goals. The Contractor awarded a subcontract to a small business for mission critical information technology for this program. The Contractor conducted three outreach events which directly led to award of subcontracts to Service Disabled Veteran Owned small businesses and HUBZone small businesses. The Contractor exceeded the small business participation requirements of the contract that required the small business to be used for 25% of the R&D portion of the contract, by awarding 50% of this requirement to small business. The Contractor submitted all required reports on time.

#### Contains:

- Quantifiable Accomplishments
- Comparison to Plan Goals
- Type of Work Performed by Small Business





# SUMMARY

- 1. CPARS Guide updated August 2017**
- 2. Small Business has been changed from: Small Business Utilization to Small Business Subcontracting except rating language.**
- 3. Small Business Participation is assessed in CPARS**
- 4. Small Business Professionals Should know how to assess/review CPARS entries for accuracy regarding to small business participation:**
  - Quantifiable Accomplishments
  - Comparison to Plan Goals
  - Type of Work Performed by Small Business
- 5. Reach out to Contracting Officers/Program Managers to review Small Business CPAR Info**



# RESOURCES

Robinson, Jeanette (2017-18) CPARS Workshops and Briefings, DAU Small Business Programs

CPARS Website: <https://www.cpars.gov>

Federal Acquisition Regulation

Defense Acquisition University <http://www.dau.mil>





# Questions? Contact Info

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# BACK UP SLIDES