



FY 17 Subcontract Reporting Highlights and Updates--

**Janice Buffler, Associate Director
Subcontracting Policy and Regional Councils
DoD Office of Small Business Programs**

May 2017



FY 17 Subcontract Report Schedule

DATE	REQUIRED ACTION
Apr 30, 2017	Due date for Contractors' ISRs/SF 294s
June 15, 2017	DoD completes review of ISRs/SF 294s
June 30, 2017	Dept / Agency Subcontracting Program Managers submit semi-annual eSRS Status Report to OSBP and DPAP
Oct 30, 2017	Due date for Contractors' ISRs/SF 294s and SSRs
Dec 15, 2017	DoD completes review of ISRs/SF 294s and SSRs
Dec 30, 2017	Dept / Agency Subcontracting Program Managers submit semi-annual eSRS Status Report to OSBP and DPAP
Mar 15, 2018	SBA determines subcontracting achievements for all Federal agencies

Who's Responsibility for Reviewing Subcontract Reports?



DATE	RESPONSIBLE PARTY
ISRs submitted under Individual Subcontract Plan by the prime contractor	Awarding Contracting Officer
ISRs submitted under Individual Subcontract Plan by the subcontractor	Upper-tier contractor awarding subcontract
SSRs submitted under Individual Subcontract Plan	Designated SSR Review Team
SSRs submitted under Commercial Subcontract Plan	Contracting Official who Approved Plan
SSRs submitted under DoD Comprehensive Subcontract Plan	DCMA CSP Team



Old Habits Are Hard to Break!

1. ISRs (or SF 294, if required): submitted semiannually
2. ISRs: Contractor **cannot** change any **contract information** (pre-filled from FPDS)
3. SSRs: required annually
4. SSRs (Individual Subcontract Plan), Block 7: Contractor **must** select Dept of Defense (9700)
5. SSRs (Commercial Subcontract Plan), Block 8, 9 or 10: Contractor **must** identify the contracting organization which approved the Commercial Subcontract Plan



Old Habits Are Hard to Break!

6. “Year-End SDB and SDB Participation reports are **no longer required**
7. Subcontracting Plan does not include goals for HBCU/MI
8. Contract in FPDS must be coded correctly for contractor to submit ISR (must be Individual Subcontracting Plan)
9. For contractors with multiple people submitting reports in eSRS and FSRS, recommend using generic email address for everyone



Old Habits Are Hard to Break!

10. Contractors submit SF 294
 - Orders under BOAs and BPAs (DFARS Class Deviation 2016-00009, Aug 15, 2016)
 - Contracts not reported in FPDS (FAR 52.219-9, Alternate III)

OSBP Website Updates and Resources



- New guidance documents have been posted on new OSBP website
<http://business.defense.gov/Acquisition/Subcontracting/>
 - “DoD Checklist for Reviewing Subcontracting Plans” (March 2017)
 - “DoD Subcontracting Program – Business Rules and Processes for (1) Electronic Subcontracting Reporting System (eSRS) and (2) Preparing and Reviewing Related Subcontract Reports” with appendices (March 2017)

OSBP Website Updates and Resources



- The appendices in the “Business Rules and Processes” guidance document are also provided as separate documents <http://business.defense.gov/Acquisition/Subcontracting/>
 - “DoD Subcontracting Program -- The Basics of Subcontracting” (March 2017)
 - “DoD Subcontracting Program -- Guide to Preparing and Reviewing an Individual Subcontract Report (ISR) for an Individual Subcontracting Plan” (March 2017)
 - “DoD Subcontracting Program -- Guide to Preparing and Reviewing a Summary Subcontract Report (SSR) for an Individual Subcontracting Plan” (March 2017)
 - “DoD Subcontracting Program -- Guide to Preparing and Reviewing a Summary Subcontract Report (SSR) for a Commercial Subcontracting Plan” (March 2017)