

## MODEL LEASING INDIVIDUAL SUBCONTRACTING PLAN INSTRUCTIONAL REMINDERS

***Remove these instructional pages before submitting your completed subcontracting plan to the Lease Contracting Officer (LCO)***

### **An individual subcontracting plan:**

- Applies to a specific federal agency (GSA) single lease
- Covers the entire lease periods, including non-firm term and any options whether exercised or not
- Contains goals that are based on the offeror's planned subcontracting (and purchasing) in support of the specific lease
- May include Indirect costs incurred for common or joint purposes, allocated on a prorated basis to the lease. If included in the plan, indirect costs must be included in the reports after award.
- Includes:
  - separate goals for the firm term, broken out by construction and non-recurring services
  - separate goals for non-firm term, if any
  - separate goals for any option, if any
  - a sum total of all periods for the entire lease term

**NOTE: The Model Leasing Individual Subcontracting Plan template is a tool lessors may choose to use when preparing their individual subcontracting plans. The Model Leasing Individual Subcontracting plan:**

- **Is NOT a fill-in-the-blank form**
- **Does not replace the FAR requirements listed in clause 52.219-9**
- **Reflects objectives GSA encourages contractors and lessors to adopt**

**REMINDER: WHEN SELECTING INDIVIDUAL SUBCONTRACTING PLAN TYPE, UNDER A MULTIPLE AWARD ID/IQ CONTRACT USED BY MORE THAN ONE AGENCY, LESSORS ARE REQUIRED TO REPORT SMALL BUSINESS SUBCONTRACTING FOR EACH FUNDING-AGENCY- ISSUED ORDER IN THE GOVERNMENT-WIDE ELECTRONIC SUBCONTRACTING REPORTING SYSTEM (ESRS) AFTER AWARD<sup>1</sup>.**

### **Use the Individual Subcontracting Plan Template:**

- For a new lease award whose total value, including options, exceeds the subcontracting plan threshold listed in FAR 19.702.

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<sup>1</sup> FAR 52.219-9 (d)(10)(iii)

- For existing leases when either a contract modification causes the value of the contract to exceed the threshold required for a subcontracting plan, or as a result of size changes due to re-representation (FAR 52.219-28). When a subcontracting plan is required, the plan shall cover the remaining periods of the lease.<sup>2</sup>

## Before preparing the subcontracting plan:

- **Review the FAR requirements set forth in the FAR subpart 19.7<sup>3</sup>, *The Small Business Subcontracting Program*, particularly:**
  - FAR clause 52.219-8, *Utilization of Small Business Concerns*<sup>4</sup>
  - FAR clause 52.219-9, *Small Business Subcontracting Plan*
  - FAR clause 52.219-16, *Liquidated damages*
- **Understand the statutory requirements in FAR 19.702:**
  - Any lessor receiving a contract for more than the simplified acquisition threshold **must agree** in the contract that SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns will have the maximum practicable opportunity to participate in contract performance consistent with its efficient performance.
  - Timely pay amounts due pursuant to the terms of their subcontracts with SBs, VOSBs, SDVOSBs, HUBZone, SDBs (including ANCs and Indian tribes), and WOSB concerns.
  - Each lease modification that causes the value of a lease without a subcontracting plan to exceed the subcontracting plan threshold listed in FAR 19.702 requires the lessor to submit a subcontracting plan for the contract, if the [Lease] Contracting Officer determines that subcontracting opportunities exist.<sup>5</sup>
  - **Failure to submit and negotiate the subcontracting plan shall make the Offeror ineligible for award of the contract.**
- **Recognize that the negotiated subcontracting plan will become a material part of the lease upon award<sup>6</sup> subject to monitoring by the federal**

<sup>2</sup> FAR 19.705-2(e)

<sup>3</sup> The FAR is found at <https://www.acquisition.gov/far/subpart-19.7>.

<sup>4</sup> Note the requirement in this clause indicating you agree to implement the U.S. policy to maximize opportunities for SBs, SDBs, WOSBs, VOSBs, SDVOSBs and HUBZone small businesses to participate as subcontractors to the **“fullest extent”**.

<sup>5</sup> For example, a \$100,000 change order to a \$1,450,000 construction contract will now increase the total value of the contract to \$1,550,000. A subcontracting plan will be required for the remaining years of the contract.

<sup>6</sup> FAR19.705-5

**government after award.** “Material” means it is just as important as the specifications, delivery schedule and price of the prime contract and is subject to the assessment of liquidated damages for failing to make a “good faith effort.”<sup>7</sup> Monitoring will be done by examining subcontracting plan reports.

- **Understand the reporting requirements after award (FAR 52.219-9(I)). Submit required reports to the Lease Contracting Officer or in the government-wide Electronic Subcontract Reporting System (eSRS):**
  - Individual plans require three reports each year:
    - Standard Form 294 (SF294) to the Lease Contracting Officer (LCO) twice a year
    - Summary Subcontract Report (SSR) in the eSRS system due no later than October 30 each year
  - Final ISR due 30 days after lease completion

**Note: for more information, check out the SBA website where you can find the subcontracting regulations, compliance reviews and points of contact: [SBA Prime-Subcontracting](#)**

## **How do I increase small business participation?**

- **Market research – Market research – Market research!**
- **Resources to find small businesses:**
  - SBA Commercial Marketing Representative: [SBA CMRs](#)
  - APEX Accelerators: [APEX Accelerators](#) (formerly known as Procurement Technical Assistance Centers: [PTAC website](#))
  - Trade and professional organizations and conferences
  - Department of Commerce Minority Business Development Agencies: [MBDA website](#)
  - State, county, city minority business offices
  - Small, minority, women-owned, veteran business organizations
  - Local chambers of commerce: [Chambers of Commerce website](#)
  - Department of Veterans Affairs (VOSBs and SDVOSBs)
  - Dynamic Small Business Search: [DSBS website](#)
- See if current suppliers meet the size status for the NAICS code that best describes the subcontract and the socio-economic definitions in FAR part 2
- Break out elements of large contracts into smaller contracts suitable for small business participation
- Implement required actions under FAR 52.219-9(e):
  - Arrange solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by SBs, SDBs, WOSBs, VOSBs, SDVOSBs and HUBZones

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<sup>7</sup> “Good faith effort” is defined in the Small Business Administration regulations at 13 CFR 125.3(d)(3).

- Where the Lessor's lists of potential SBs, SDBs, WOSBs, VOSBs, SDVOSBs, and HUBZone small business subcontractors are excessively long, reasonable effort shall be made to give all such small business concerns an opportunity to compete over a period of time
- Adequate and timely consideration of the potentialities of small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns in all "make-or-buy" decisions.
- Counsel and discuss subcontracting opportunities with representatives of SBs, SDBs, VOSBs, SDVOSBs, WOSBs and HUBZone small businesses
- Confirm that a subcontractor representing itself as a HUBZone small business concern is certified by SBA as a HUBZone small business concern in accordance with 52.219-8(d)(2)
- Provide notice to subcontractors concerning penalties and remedies for misrepresentations of business status as small, veteran-owned small business, HUBZone small, small disadvantaged, or women-owned small business for the purpose of obtaining a subcontract that is to be included as part or all of a goal contained in the Contractor's subcontracting plan.
- For all competitive subcontracts over the simplified acquisition threshold, as defined in FAR 2.101 on the date of subcontract award, in which a small business concern received a small business preference, upon determination of the successful subcontract offeror, prior to award of the subcontract the Contractor must inform each unsuccessful small business subcontract offeror in writing of the name and location of the apparent successful offeror and if the successful subcontract offeror is a small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, or women-owned small business concern.
- Assign each subcontract the NAICS code and corresponding size standard that best describes the principal purpose of the subcontract.

## How to develop subcontracting goals?

***Note: The GSA subcontracting goals listed below are the agency's goals and are provided for your information only, subject to change<sup>8</sup>. The following tips are offered to assist you with calculating the subcontracting plan goals to be listed in the individual subcontracting plan:***

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<sup>8</sup>The goals are negotiated with the Small Business Administration (SBA) annually based on recent agency achievements. SBA is responsible for the Federal Government Goaling Program. Information on the goaling process which includes subcontracting can be found at: [SBA Goaling Process](#).

- Decide what your company can provide internally, then determine what is left to outsource
- Estimate total subcontracting dollars (“outsourcing”, “purchases” or “spend”) planned to both small and “other than small” business (OTSB)<sup>9</sup> concerns for each period of the contract (base period and each option period):
- Separately identify the dollars that will be subcontracted to both large/OTSB and to small businesses, which when added together make up the total dollars subcontracted to all concerns and 100%.
- For the small businesses, identify if your supplier also meets one of the small business socio-economic categories (small disadvantaged business (SDB); women-owned small business (WOSB); veteran-owned small business (VOSB); service-disabled veteran-owned small business (SDVOSB) and Historically Underutilized Business Zone small business (HUBZone). Note: small businesses can meet more than one socio-economic category.<sup>10</sup>
- Apply the subcontracted dollars towards all small business socio-economic categories applicable to your suppliers. For example, a \$30,000 subcontract awarded to a woman-owned, HUBZone, service-disabled veteran owned small business:
  - apply \$30,000 against WOSB
  - apply \$30,000 against HUBZone
  - apply \$30,000 against SDVOSB
  - apply \$30,000 against VOSB (since a SDVOSB is a VOSB)
  - apply \$30,000 against small business since WOSB, HUBZone and SDVOSB are socioeconomic small business subcategories.

**Note: This is not double/triple counting, but ensures credit is given to all socioeconomic categories represented by the small business**

- The small business dollar amount must include all small business socioeconomic subcategories; i.e., VOSB, SDVOSB, HUBZone, SDB, WOSB, (plus any "other small" businesses that do not fall within one of these specified subgroups). Note: include Alaskan Native Corporations (ANCs) and Indian tribes are included in both the SDB and total small business amounts.
- Once the dollars have been assigned to each socioeconomic category, calculate the percentage for each category separately against the “Total dollars to be subcontracted.”

<sup>9</sup> The term “other than small business” is used to indicate all other certifications that are not small. Examples include non-profits, universities and educational institutions, utilities, state, and local governments.

<sup>10</sup> For example, a small business can be a WOSB as well as a SDVOSB. Find the definitions in FAR part 2 ([https://www.acquisition.gov/far/part-2#FAR\\_Subpart\\_2\\_1](https://www.acquisition.gov/far/part-2#FAR_Subpart_2_1)).

\* **Caution:** Only the OTSB total plus the small business total should equal the total dollars to be subcontracted in both dollars and percent. See calculation “notes” within Section III of this template for further assistance.

Do **NOT** add together the small business socioeconomic subcategories to reach the total small business figure, as the same dollars should already be included in the total for small business.

Planned Subcontracting by Business Size	Sample Dollars	GSA Goals (FY23)
Total Subcontracted Dollars	\$1,000,000	100%
Other than Small Business (OTSB/Large)	\$800,000	80%
All Small (includes Veteran-Owned Small, Service-Disabled Veteran-Owned Small, HUBZone small, Small Disadvantaged Business, Women-Owned Small, and other small business concerns, i.e. ANCs, etc.	\$200,000	20%

**The Total dollars to be subcontracted will be used as the denominator in calculating the percentages for each socio-economic category.**

Identify subcontracts awarded to the small business socio-economic subcategories and calculate the percentages using the total subcontract dollars as the denominator:

Planned Subcontracting by Business Size	Sample Dollars	GSA Goal (FY 2023)
Veteran-Owned Small Business	\$30,000	3%

<b>Service-Disabled Veteran-Owned Small Business<sup>11</sup></b>	<b>\$30,000</b>	<b>3%</b>
<b>HubZone Small Business</b>	<b>\$30,000</b>	<b>3%</b>
<b>Small Disadvantaged Business</b>	<b>\$50,000</b>	<b>5%</b>
<b>Women-Owned Small Business</b>	<b>\$50,000</b>	<b>5%</b>

**REMINDER:** in calculating the goals for lease term remember that each period is most likely more than one year in duration. For example, lease firm term is often 10 years in duration

**Who reviews subcontracting plans?** FAR subpart 19.7 indicates the responsibility for subcontracting plans before contract award, upon award and after award falls on the [lease] contracting officer. Before award, the LCO must:

- Negotiate an acceptable plan with the lessor
- Consider recommendations by the agency small business advisor as well as the Small Business Administration Procurement Center Representative. These are the technical experts when it comes to small business and are required to review the plans by the FAR.

**How does a Lease Contracting Officer review a subcontracting plan?**

- Does the goals proposed demonstrate “**maximum** practicable opportunity for SBs, SDBs, WOSBs, VOSBs, SDVOSBs and HUBZone to participate in the performance of the contract” as required by statute<sup>12</sup>?
- Does the narrative support the goals proposed? Think of the small business goals as the thesis statement and ensure the rest of the plan supports how the goals will be achieved throughout the life of the lease.
- Is the plan complete? Are all requirements for a plan as listed in FAR clause 52.219-9 addressed? The Model Plan lists all of the requirements.
- Like any goal, do the goals proposed build on past achievement?
- Does the plan demonstrate how your company will keep its market research fresh to find qualified SBs, SDBs, WOSBs, VOSBs, SDVOSBs and HUBZone?
- How do the estimated goal percentages compare with the Agency’s subcontracting goals?

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<sup>11</sup> SDVOSB should always be less than or equal to VOSB. By definition, a SDVOSB is also a VOSB.

<sup>12</sup> FAR 19.702, *Statutory requirement*, and clause 52.219-8, *Utilization of small business concerns*.

- If any of the proposed goals are less than the Agency's subcontracting goal, provide an explanation. "Tell the story".
- Are there any "0" proposed? Provide an explanation as zero for a goal does not make sense. Can you find some dollars to give to the small business entity, maybe allocated from the indirect cost pool?

## Prepare the individual subcontracting plan:

- Determine what will be subcontracted (supplies and services) throughout the life of the lease and the estimated costs of the subcontracts.
- Identify the size and socio-economic categories of your suppliers, especially SBs, SDBs, WOSBs, VOSBs, SDVOSBs and HUBZone small businesses. Best practice: if the size status of a supplier is unknown, check with the supplier to see if they can be considered small for the NAICS applying to the subcontract. If small, do they also meet the definition of one or more of the socio-economic categories: SDB, WOSB, VOSB, SDVOSB or HUBZone?
- **Market research – Market research – Market Research!** Find new SB, SDB, WOSB, VOSB, SDVOSB and HUBZone suppliers who can meet the needs of the contract. If this is a follow-on or similar lease, does market research reveal greater opportunities for all types of small business than found in the past? Check the Dynamic Small Business Search: [DSBS Website](#)
- Calculate small business subcontracting goals, ensuring estimated dollars are applied against all socio-economic categories represented by the small business (e.g., apply the same amount of dollars across multiple designations). Goals must reflect good faith efforts and realistic stretch goals.<sup>13</sup> Once the determination is made on what will be subcontracted, adapt the Model Plan to fit your subcontracting situation. Ensure the subcontracting plan reflects best faith efforts and realistic **stretch** goals. Put thought into maximum practicable opportunities that might be possible and achievable for all socio-economic categories as well as small business throughout the life of the lease.
- Complete the tables for each period of the contract, taking into consideration the time covered by the firm term, non-firm term, or any option (1 year? 5 years? 10 years?).
- Include a summary table, adding all periods of performance (firm term + non-firm term + options) together.
- Ensure the narrative of the subcontracting plan supports the proposed goals:

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<sup>13</sup> FAR 19.705-4(c) states "The contracting officer shall take particular care to ensure that the offeror has not submitted unreasonably low goals to minimize exposure to liquidated damages and to avoid the administrative burden of substantiating good faith efforts. Additionally, particular attention should be paid to the identification of steps that, if taken, would be considered a good faith effort. No goal should be negotiated upward if it is apparent that a higher goal will significantly increase the Government's cost or seriously impede the attainment of acquisition objectives."

- For example, does the description of what will be subcontracted match the goals proposed?
  - Does supporting information from similar leases, or past leases support the proposed goals?
- Note: Please remove these instructional pages and any instructional language (in **blue**) before submitting to the Lease Contracting Officer for review and approval.

## REPORTING INSTRUCTIONS FREQUENTLY ASKED QUESTIONS FOR LESSORS

### Why are subcontracting reports important?

Negotiated subcontracting plans become a **material part of the contract**. The reports monitor the progress against the plan. Failure to submit the reports as required under FAR 52.219-9 may negatively affect contractor performance evaluations or may indicate a lack of good faith effort to maximize practicable subcontracting opportunities for SBs, SDBs, WOSBs, VOSB, SDVOSBs and HUBZone small businesses as required by law.

### What should I know before submitting a report?

- Understand the small business subcontracting program requirements in FAR subpart 19.7. Pay attention to the reporting requirements listed in FAR 52.219-9(l) and any supplemental instructions the CO may have included in the lease
- Review the subcontracting plan
- Understand the differences in the reports required for the type of subcontracting plan in the contract
- Follow the directions on back of the Standard Form 294 and the eSRS home page such as “Quick Reference Guides for Individual Plan Summary Subcontracting Reports”.
  - Do not include in the reports purchases from a corporation, company, or subdivision that is an affiliate of the Contractor or subcontractor. Subcontract awards by the affiliates shall be treated as subcontract awards by the Contractor
  - Subcontract award data reported by the Contractor and subcontractors shall be limited to awards made to their immediate next-tier subcontractors. Credit cannot be taken for awards made to lower tier subcontractors, unless the Contractor or subcontractor has been designated to receive a small business or small disadvantaged business credit from an ANC or Indian tribe.
  - Only include subcontracts involving performance in the United States or its outlying areas in these reports
- Select Public Building Service (PBS) as the “agency” instead of “General Services Administration” when completing the SSR in eSRS

### What reports are required for an *individual* subcontracting plan?

There are two types of reports required for individual subcontracting plans:

1. **Standard Form 294 (SF294)** is lease specific.
  - a. Data presented in the SF294s are cumulative over the life of the lease
  - b. When a subcontracting plan contains separate goals for the firm term, non-firm term and/or option, the “Current Goal” goal inserted on the SF294 shall be the sum of the firm term period through the current period (non-

firm term and/or option). For example, for a report submitted after the non-firm term option is exercised, the “Current Goal” listed would be the sum of the goals for the firm term plus the non-firm term.

- c. If a subcontracting plan has been added to the lease pursuant to 19.702(a)(3) or 19.301-2(e), the Contractors achievements must be reported in the SF294 on a cumulative basis from the date of incorporation of the subcontracting plan into the lease.
- d. Includes indirect costs in the report if the goals of the individual subcontracting plan included indirect costs.
- e. Three SF294s are due within 30 days of the end of each reporting period:
  - i. Period ending March 31
  - ii. Period ending September 30
  - iii. Final ISR for the lease within 30 days of lease completion

2. **Individual Plan Summary Subcontracting Report (SSR)** is agency-specific:

- a. Encompasses all subcontracting under prime contracts (leases) and subcontracts that the contractor has with an executive agency (GSA), regardless of the dollar value of the subcontracts.
- b. Includes indirect costs appropriately allocated.

**I am having difficulty in meeting the goals established in the contract’s subcontracting plan. What should I do?**

A number of actions can be taken:

- 1. Read the plan. Did you do what you said you were going to do in the plan to find qualified SBs, SDBs, WOSBs, VOSBs, SDVOSBs and HUBZones?
- 2. Did a key small business supplier grow into “other than small”? Explain any “0” or shortfalls in the “Remarks” section of the report. Be sure to identify what corrective action you will take to get back on track. “Tell the story” in the report.
- 3. Did you post your company’s subcontracting opportunities on the **SBA SubNet** database?
- 4. Does your website make it easy for small businesses to find you and your company’s opportunities?
- 5. How do you keep market research fresh? Check out the following resources recommended in GSA’s Model Subcontracting Plan Instructions:
  - a. **SBA Commercial Marketing Representative:** [SBA CMRs](#)
  - b. **APEX Accelerators:** [APEX Accelerators](#) (formerly known as Procurement Technical Assistance Centers: [PTAC website](#))
  - c. Trade and professional organizations and conferences
  - d. Department of Commerce Minority Business Development Agencies: [MBDA website](#)
  - e. State, county, city minority business offices
  - f. Small, minority, women-owned, veteran business organizations
  - g. Local chambers of commerce: [Chambers of Commerce website](#)

**h. Department of Veterans Affairs (VOSBs and SDVOSBs)**

**i. Dynamic Small Business Search: [DSBS website](#)**

6. Do current suppliers meet the size status for the NAICS code that best describes the subcontract and the socio-economic definitions in FAR part 2
7. Are you able to break out elements of large acquisitions into smaller contracts suitable for small business participation?
8. Did you follow the required actions listed in FAR 52.219-9(e)?

**[*INSERT COMPANY NAME*]**  
**INDIVIDUAL SMALL BUSINESS SUBCONTRACTING PLAN**

**I. IDENTIFICATION DATA: [*COMPLETE THE FOLLOWING*]**

Address: \_\_\_\_\_

Date Prepared: \_\_\_\_\_

Description of Lease: \_\_\_\_\_

Request for Lease Proposal Number: \_\_\_\_\_

Lease Number (*if existing lease*): \_\_\_\_\_

*Insert dates below for the lease duration, if known (or insert N/A if the lease does not include specified option period).*

**II. LEASE PERIODS AND ESTIMATED LEASE DOLLAR VALUE**

Firm Term: \_\_\_\_\_

Non-Firm Term: \_\_\_\_\_

Option: \_\_\_\_\_

**Total Estimated Lease Value - \$** \_\_\_\_\_

*(Provide separate estimate for firm term, non-firm term and option, if any:*

Firm Term \$ \_\_\_\_\_

Non-Firm Term: \$ \_\_\_\_\_

Option Period: \$ \_\_\_\_\_

**Place of Performance:** \_\_\_\_\_

**Unique Entity Identifier (UEI):** *(under the lease awarded or pending award)*

**III. GOALS:**

*FAR 52.219-9(d) requires that the subcontracting plan include:*

*(1) Goals expressed in terms of percentages of total planned subcontracting dollars, for the use of small business (SB) concerns as subcontractors*

*(2) Statement of total dollars planned to be subcontracted for an individual contract plan.*

*(3) Separate percentage goals and dollars for socio-economic small businesses<sup>14</sup>, veteran-owned small business (VOSB), service-disabled veteran-owned small business (SDVOSB), HUBZone small business, small disadvantaged business (SDB)<sup>15</sup> (including ANCs and Indian tribes) and women-owned small business (WOSB) concerns as subcontractors.*

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<sup>14</sup> Including Alaskan Native Corporations (ANCs) and Indian tribes

<sup>15</sup> Including ANCs and Indian tribes

*Individual plans will reflect lease-specific goals and shall contain separate statements and goals for the firm term and separately for the non-firm term and any option. Note that dollars and percentages to large and total small businesses (all inclusive) must equal the total subcontracted to all categories in both dollars and percentages.*

**EACH LESSOR IS EXPECTED TO OFFER THE “MAXIMUM PRACTICABLE OPPORTUNITIES” TO EACH TYPE OF SMALL BUSINESS CONCERN (SDB, WOSB, VOSB, SDVOSB and HUBZONE) TO PARTICIPATE IN THE LEASE CONSISTENT WITH “GOOD FAITH EFFORTS” AND SUPPORTED BY THEIR REPORTS AND RECORDS.**

**COMPLETE FORMAT BELOW:**

**Note that a separate table is required for each term and option of the lease:**

- **firm term**
- **non-firm term, if any**
- **option, if any**

**A separate table is required for the total of firm + non-firm + option.**

**REMEMBER:** the dollars listed must reflect the entire term. For example, if the firm term is 10 years, the subcontracted dollars listed must cover the entire 10 year period.

**Best practice:** show growth in goal achievement from one term to the other.

**[Company Name]** provides the following separate dollar and percentage goals, which are a percentage of the total subcontracting dollars for each business category:

<b>Firm Term</b> (expressed in dollars and percentages of the total dollars planned to be subcontracted) <b>Years X - X</b>		
<b>PLANNED SUBCONTRACTING TO:</b>	<b>DOLLARS</b>	<b>PERCENT</b>
<b>1. Total Dollars to be Subcontracted (2 + 3 = 1) OTSB/Large and all small businesses must equal total amount to be subcontracted (both \$ and %)</b>		100%
<b>2. Other than Small Businesses/Large Businesses</b>		
<b>3. All Small Businesses</b> (including ANCs & Indian tribes)		
<b>4. Veteran-Owned Small Businesses (VOSB)</b> <sup>16</sup>		
<b>5. Service-Disabled Veteran-Owned Small Businesses (SDVOSB)</b>		
<b>6. HUBZone Small Business (HUBZone)</b>		
<b>7. Small Disadvantaged Businesses (SDB)</b> (including ANCs & Indian tribes)		
<b>8. Women-Owned Small Businesses (WOSB)</b>		

**Complete the following tables for non-firm term and any option:**

<sup>16</sup> Items 4 through 8 stand on their own. They do not equate to the small business total. Refer to “How to do the math” tips in the instructions.

If applicable:

Non-Firm Term (expressed in dollars and percentages of total dollars planned to be subcontracted) Years X – X		
PLANNED SUBCONTRACTING TO:	DOLLARS	PERCENT
1. Total Dollars to be Subcontracted <i>(2 + 3 = 1) OTSB/Large and all small businesses must equal total amount to be subcontracted (both \$ and %)</i>		100%
2. Other than Small Businesses/Large Businesses		
3. All Small Businesses (including ANCs & Indian tribes)		
4. Veteran-Owned Small Businesses (VOSB)		
5. Service-Disabled Veteran-Owned Small Businesses (SDVOSB)		
6. HUBZone Small Business (HUBZone)		
7. Small Disadvantaged Businesses (SDB) (including ANCs & Indian tribes)		
8. Women-Owned Small Businesses (WOSB)		

If applicable (for each option):

Option (expressed in dollars and percentages of total dollars planned to be subcontracted)		
PLANNED SUBCONTRACTING TO:	DOLLARS	PERCENT
1. Total Dollars to be Subcontracted <i>(2 + 3 = 1) OTSB/large and all small businesses must equal total amount to be subcontracted (both \$ and %)</i>		100%
2. Other than Small Businesses/ Large Businesses		
3. All Small Businesses (including ANCs & Indian tribes)		
4. Veteran-Owned Small Businesses (VOSB)		
5. Service-Disabled Veteran-Owned Small Businesses (SDVOSB)		
6. HUBZone Small Business (HUBZone)		
7. Small Disadvantaged Businesses (SDB) (including ANCs & Indian tribes)		
8. Women-Owned Small Businesses (WOSB)		

**Total (Firm term + Non-firm Term + Option(s)):**

*The Total Goals (sum of all periods, base + option(s)) table below provides a comprehensive look for government reviewers<sup>17</sup> of the plan at the subcontracting opportunities for the entire lease*

- *Add the total dollars estimated for each period of the contract and socioeconomic category and place the amounts in the spaces below.*
- *Compute the percentages for each category for the entire lease*

<b>TOTAL LEASE GOALS</b> (expressed in dollars and percentages of total dollars planned to be subcontracted)		
<b>PLANNED SUBCONTRACTING TO:</b>	<b>DOLLARS</b>	<b>PERCENT</b>
<b>1. Total Dollars to be Subcontracted (2 + 3 = 1) OTSB/Large and all small businesses must equal total amount to be subcontracted (both \$ and %)</b>		<u>100%</u>
<b>2. Other than Small Businesses/ Large Businesses</b>		
<b>3. All Small Businesses</b> (including ANCs & Indian tribes)		
<b>4. Veteran-Owned Small Businesses (VOSB)</b>		
<b>5. Service-Disabled Veteran-Owned Small Businesses (SDVOSB)</b>		
<b>6. HUBZone Small Business (HUBZone)</b>		
<b>7. Small Disadvantaged Businesses (SDB)</b> (including ANCs & Indian tribes)		
<b>8. Women-Owned Small Businesses (WOSB)</b>		

#### **IV. PRINCIPAL TYPES OF SUPPLIES AND SERVICES TO BE SUBCONTRACTED:**

*Describe the principal types of supplies and services to be subcontracted and an identification of types of supplies or services planned for subcontracting to SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns.*

*B. FAR clause 52.219-9(d)(3) requires a description of the principal types of supplies and services to be subcontracted and an identification of types planned for subcontracting to SB, VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns. **Check all that apply below, ensuring that at least one item is indicated for each column.***

*If assistance is needed to locate small business sources, contact your local Small Business Administration Commercial Market Representative via [www.sba.gov/localresources](http://www.sba.gov/localresources), or access the Dynamic Small Business Search database at [http://dsbs.sba.gov/dsbs/search/dsp\\_dsbs.cfm](http://dsbs.sba.gov/dsbs/search/dsp_dsbs.cfm). You may also post solicitations for small business opportunities on SBA's SUB-Net at <https://eweb1.sba.gov/subnet/search/index.cfm>.*

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<sup>17</sup> The FAR requires the subcontracting plan to be reviewed and negotiated by the Lease Contracting Officer with input from the Agency's small business technical advisor (SBTA) as well as the Small Business Administration's Procurement Center Representative (SBA PCR). LCOs are required to consider the recommendations by the agency SBTA and the SBA PCR.

The principal types of supplies and/or services that [**Company Name**] anticipates to be subcontracted and the identification of the type of business concern planned are as follows. GSA requests inserting the applicable NAICS code<sup>18</sup> under the description:

**Business Category or Size**  
**Construction**

Supplies/Services [Insert individual trades as appropriate (e.g. Plumbing, Drywall, etc.)]	OTSB/ Large	Small	VOSB	SDVOSB	HUBZone	SDB	WOSB
Example: Painting NAICS 238230		<u>X</u>	<u>X</u>	<u>X</u>			

**Business Category or Size**  
**Recurring Services**

Supplies/Services [Insert as appropriate (e.g. Janitorial, Landscaping, etc.)]	OTSB/ Large	Small	VOSB	SDVOSB	HUBZone	SDB	WOSB

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<sup>18</sup> NAICS codes are found at:  
<https://www.census.gov/eos/www/naics/&sa=D&ust=1602006164214000&usg=AFQjCNFC3JoeJ97-L26UvPx-lkpYwV-7uq>

**Business Category or Size**  
**Other Subcontracted Supplies and/or Services**

Supplies/Services	OTSB/ Large	Small	VOSB	SDVOSB	HUBZone	SDB	WOSB

Explain in the narrative of this section any low goals<sup>19</sup> and the actions planned in order to support your plan. Otherwise, the LCO, GSA Office of Small and Disadvantaged Business Utilization or the SBA may deem your plan unacceptable preventing lease award. *NOTE: “zero” is not considered a “positive” goal which the FAR requires. Having a goal will provide the incentive for your company to make a “good faith effort” in fostering opportunities for SB,SDB, WOSB, VOSB, SDVOSB and HUBZone SB. After award, the Lease Contracting Officer assesses whether you have made a “good faith effort” to implement the subcontracting plan.*

**V. DESCRIPTION OF METHOD USED TO DEVELOP SUBCONTRACTING GOALS:**

*Describe the method used to develop the subcontracting goals. Explain or state the basis for establishing your proposed goals (i.e., based on historical data and experience, market research, etc.) Provide a justification for any low goal(s) and other explanations for your challenges in this section.*

[**Company Name**] used the following method to develop the subcontracting goals:

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**VI. DESCRIPTION OF METHOD USED TO IDENTIFY POTENTIAL SOURCES:**

*Describe the method used to identify potential sources for solicitation purposes (e.g., existing company source lists, the System for Award Management (SAM), veterans service organizations, the National Minority Purchasing Council Vendor Information Service, the Research and Information Division of the Minority Business Development Agency in the Department of Commerce, or small, HUBZone, small disadvantaged, and women-owned small business trade associations). A firm may rely on the information*

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<sup>19</sup> Low goals are those less than the Agency subcontracting goals.

contained in SAM<sup>20</sup> as an accurate representation of a concern's size and ownership characteristics for the purposes of maintaining SB, VOSB, SDVOSB, HUBZone, SDB, and WOSB source lists.

**[Company Name]** identifies potential subcontractors using the following source lists and organizations:

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**VII. INCLUSION OF INDIRECT COSTS IN ESTABLISHING GOALS:** *State whether or not indirect costs were used in establishing subcontracting goals for SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns.*<sup>21</sup>

Indirect costs \_\_\_\_\_ HAVE BEEN (or) \_\_\_\_\_ HAVE NOT BEEN included in the dollar and percentage subcontracting goals stated above.

***If indirect costs HAVE been included<sup>22</sup>, the method used to determine the proportionate share of indirect costs to be incurred with small business concerns was as follows:***

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**VIII. PROGRAM ADMINISTRATOR:** *FAR clause 52.219-9(d)(7) requires the name of the individual employed by the Offeror who will administer the Offeror's subcontracting program, and a description of the duties of the individual. Please add the contact information for this person (telephone number and email address), in case of questions, and provide an alternate point of contact, if applicable.*

Name:

Title/Position:

Address:

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<sup>20</sup> Use of SAM as its source list does not relieve a firm of its responsibilities (e.g., outreach, assistance, counseling, or publicizing subcontracting opportunities) in this clause.

<sup>21</sup> Indirect costs represent the expenses of doing business that are NOT easily identified with a specific project (i.e. contract or grant) but are generally recognized as ordinary and necessary for the general operation of the Contractor's organization and the conduct of activities it performs. Types of indirect costs include routine supplies and general and administrative (G&A) expenses. However, fringe benefits (e.g. services or benefits provided to employees such as health insurance, payroll taxes, pension contribution, etc.), are NOT considered subcontracting and shall be excluded.

<sup>22</sup> Including indirect costs may be beneficial to avoid "0" dollar goals. If indirect costs are included in the goals, these costs must be included in the Standard Form 294 report submitted after award.

City/State/Zip Code:

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Telephone number:

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Email Address:

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Alternate POC with contact information:

**Duties:** FAR clause 52.219-9(e) requires the contractor to perform the following functions in order to effectively implement this plan to the extent, consistent with efficient contract performance **[GSA requires acknowledgement of these required duties by including the following in the subcontracting plan]**:

1. Assist SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns. Where the Contractor's lists of potential SB, VOSB, SDVOSB, HUBZone, SDB and WOSB subcontractors are excessively long, reasonable effort shall be made to give all such small business concerns an opportunity to compete over a period of time.
2. Provide adequate and timely consideration of the potentialities of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns in all "make-or-buy" decisions.
3. Counsel and discuss subcontracting opportunities with representatives of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB firms.
4. Confirm that a subcontractor representing itself as a HUBZone small business concern is identified as a certified HUBZone small business concern by accessing the System for Award Management (SAM) database or by contacting SBA.
5. Provide notice to subcontractors concerning penalties and remedies for misrepresentations of business status as SB, VOSB, SDVOSB, HUBZone, SDB and WOSB for the purpose of obtaining a subcontract that is to be included as part or all of a goal contained in the Contractor's subcontracting plan.
6. For all competitive subcontracts over the simplified acquisition threshold, as defined in FAR [2.101](#) on the date of subcontract award, in which a small business concern received a small business preference, upon determination of the successful subcontract offeror, prior to award of the subcontract the Contractor must inform each unsuccessful small business subcontract offeror in writing of the name and location of the apparent successful offeror and if the successful subcontract offeror is a SB, VOSB, SDVOSB, HUBZone, SDB or WOSB.

7. Assign each subcontract the NAICS code and corresponding size standard that best describes the principal purpose of the subcontract.

Other ways the Plan Administrator can ensure the company meets the goals of the plan **demonstrating “good faith effort”** [*Check those that will be done under this plan*]:

\_\_\_\_ Develop and promote company/division policy statements that demonstrate the company's/division's support for awarding contracts and subcontracts to SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns.

\_\_\_\_ Develop and maintain bidders' lists of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns from all possible sources.

\_\_\_\_ Ensure periodic rotation of potential subcontractors on bidders' lists.

\_\_\_\_ Ensure that SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns are included on the bidders' list for every subcontract solicitation for products and services they are capable of providing.

\_\_\_\_ Ensure that subcontract procurement “packages” are designed to permit the maximum possible participation of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns

\_\_\_\_ Review subcontract solicitations to remove statements, clauses, etc., which might tend to restrict or prohibit SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns.

\_\_\_\_ Ensure that the subcontract bid proposal review board documents its reasons for not selecting any low bids submitted by SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns.

\_\_\_\_ Oversee the establishment and maintenance of contract and subcontract award records.

\_\_\_\_ Attend or arrange for the attendance of company counselors at Business Opportunity Workshops, Minority Business Enterprise Seminars, Trade Fairs, etc.

\_\_\_\_ Directly or indirectly counsel SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns on subcontracting opportunities and how to prepare bids to the company.

\_\_\_\_ Conduct or arrange training for purchasing personnel regarding the intent and impact of Section 8(d) of the Small Business Act on purchasing procedures.

\_\_\_\_ Develop and maintain an incentive program for buyers that support the subcontracting program.

\_\_\_\_ Monitor the company's performance and make any adjustments necessary to achieve the subcontract plan goals.

\_\_\_\_ Prepare and submit timely reports as outlined in Section VII.

\_\_\_\_ Coordinate the company's activities during compliance reviews by Federal agencies.

\_\_\_\_ Promote opportunities for small businesses on the company website

\_\_\_\_ (*List any additional duties*)

## **IX. EQUITABLE OPPORTUNITY:**

*FAR clause 52.219-9(d)(8) requires a description of the efforts the offeror will make to assure that SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns have an equitable opportunity to compete for subcontracts.*

**[Company Name]** will make every effort to ensure that all small business concerns have an equitable opportunity to compete for subcontracts. These efforts may include one or more of the following activities: *(please indicate which of the following apply or adapt list to fit your company's efforts)*

A. Outreach efforts to obtain sources by:

- ☐ Contacting minority and small business trade associations
- ☐ Contacting business development organizations
- ☐ Requesting sources from the Dynamic Small Business Search ([Link to Dynamic Small Business Search](#))
- ☐ Attending small and minority business trade fairs and procurement conferences

B. Internal efforts to guide and encourage purchasing personnel:

- ☐ Presenting workshops, seminars and training programs
- ☐ Establishing, maintaining and using small, HUBZone small, small disadvantaged, women-owned small, veteran-owned small, and service-disabled veteran-owned small business source lists, guides, and other data for soliciting subcontracts
- ☐ Monitoring activities to evaluate compliance with the subcontracting plan

C. Other Additional efforts: *(Please describe below.)*

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**X. ASSURANCES OF CLAUSE INCLUSION AND FLOW DOWN:**

*FAR clause 52.219-9(d)(9) requires several assurances that the offeror will include the clause at 52.219-8, Utilization of Small Business Concerns (see 19.708(a)), in all subcontracts that offer further subcontracting opportunities, and that the offeror will require all subcontractors (except small business concerns) that receive subcontracts in excess of the subcontracting plan threshold listed in FAR 19.702 to adopt a plan that complies with the requirements of this clause (see 19.708(b)).*

**[Company Name]** agrees to include the FAR Clause 52.219-8, "Utilization of Small Business Concerns" in all subcontracts that offer further subcontracting opportunities, and will require all subcontractors *(except small business concerns)* that receive subcontracts in excess of the subcontracting plan threshold listed in FAR 19.702 to adopt a plan that complies with the requirements of the clause at [52.219-9](#), Small Business Subcontracting Plan.

**XI. ASSIGNMENT OF SIZE STANDARDS TO SUBCONTRACTS**

**[Company Name]** agrees to assign North American Industry Classification System (NAICS) codes to subcontracts and further agrees to provide the socio-economic status of the successful subcontractor in the notification to the unsuccessful offerors for the subcontracts in accordance with FAR 52.219-9.

## **XII. REPORTING AND COOPERATION:**

*FAR 52.219-9(d)(10) requires assurances that the offeror will do the following:*

**[Company Name]** agrees to:

- (10)(i) Cooperate in any studies or surveys as may be required;
- (ii) Submit periodic reports so that the Government can determine the extent of compliance by the offeror with the subcontracting plan;
- (iii) Submit the SF 294 (Individual Subcontract Report)\*\* to the LCO, and the Summary Subcontract Report (SSR) \*\* using the Electronic Subcontracting Reporting System (eSRS) (<http://www.esrs.gov>), following the instructions in the eSRS;
- (iv) Ensure that its subcontractors with subcontracting plans agree to submit the SF 294 to the LCO and/or the SSR\*\* using the eSRS;
- (v) Provide its prime contract number and its UEI and the e-mail address of the Government or Contractor official responsible for acknowledging or rejecting the reports, to all first-tier subcontractors with subcontracting plans so they can enter this information into the eSRS when submitting their reports; and
- (vi) Require each subcontractor with a subcontracting plan to provide the prime contract number and its own UEI, and the e-mail address of the Government or Contractor official responsible for acknowledging or rejecting the reports, to its subcontractors with subcontracting plans.

Reports are to be submitted within 30 days after the close of each calendar period as indicated in the following chart:

<u>Calendar Period</u>	<u>Report Due</u>	<u>Date Due</u> <sup>23</sup>	<u>Submit Report to:</u>
10/01--03/31	SF294*	04/30	LCO
04/01--09/30	SF294*	10/30	LCO
10/01--09/30	SSR**	10/30	eSRS

***\*SF 294s are submitted until further notice in lieu of the ISRs.***

***\*\*File the SSRs in the government-wide eSRS system as required by FAR clause 52.219-9(l).***

**ASSISTANCE IN REPORT PREPARATION CAN BE FOUND IN THE ATTACHMENT, REPORTING INSTRUCTIONS FOR CONTRACTORS, or in guidance documents on the eSRS home page (<https://esrs.gov>), and from your local SBA Commercial Marketing Representative.**

## **XIII. RECORDKEEPING:**

*FAR clause 52.219-9(d)(11) requires a description of the types of records that will be maintained concerning procedures that have been adopted to comply with the requirements and goals in the plan, including establishing source lists; and a description of the efforts to locate SB (including ANCs and*

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<sup>23</sup> The dates listed are considered “no later than”. Thus, the ISRs must be submitted to the LCO no later than these dates, April 30 and October 30, respectively, and the SSR must be entered into the eSRS system no later than October 30 each year.

*Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns and award subcontracts to them.*

**[Company Name]** will maintain records concerning procedures that have been adopted to comply with the requirements and goals in the plan, including establishing source lists; and a description of efforts to locate SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns and award subcontracts to them. The records shall include at least the following (on a plant-wide or company-wide basis, unless otherwise indicated):

1. Source lists (e.g., SAM), guides, and other data that identify SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns.
2. Organizations contacted in an attempt to locate sources that are SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns.
3. Records on each subcontract solicitation resulting in an award of more than the simplified acquisition threshold as defined in FAR 2.101 as of the date of the subcontract award, indicating:
  - (A) Whether small business concerns were solicited and, if not, why not;
  - (B) Whether veteran-owned small business concerns were solicited and, if not, why not;
  - (C) Whether service-disabled veteran-owned small business concerns were solicited and, if not, why not;
  - (D) Whether HUBZone small business concerns were solicited and, if not, why not;
  - (E) Whether small disadvantaged business concerns were solicited and, if not, why not;
  - (F) Whether women-owned small business concerns were solicited and, if not, why not; and
  - (G) If applicable, the reason award was not made to a small business concern.
4. Records of any outreach efforts to contact
  - (A) Trade associations;
  - (B) Business development organizations;
  - (C) Conferences and trade fairs to locate small, HUBZone small, small disadvantaged, and women-owned small business sources; and
  - (D) Veterans service organizations
5. Records of internal guidance and encouragement provided to buyers through
  - (A) Workshops, seminars, training, etc.; and,
  - (B) Monitoring performance to evaluate compliance with the program's requirements.

6. On a contract-by-contract basis, records to support award data submitted by the offeror to the Government, including the name, address, and business size of each subcontractor. **Contractors having commercial plans need not comply with this requirement.**
7. Other records to support your compliance with the subcontracting plan: *(Please describe below.)*

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#### **XIV. ADDITIONAL ASSURANCES:**

1. **[Company Name]** will make a good faith effort to acquire articles, equipment, supplies, services, or materials, or obtain the performance of construction work from the small business concerns that it used in preparing the bid or proposal, in the same or greater scope, amount, and quality used in preparing and submitting the bid or proposal.
2. **[Company Name]** will provide the Lease Contracting Officer with a written explanation if the lessor fails to acquire articles, equipment, supplies, services or materials or obtain the performance of construction work as described in (d)(12) of FAR clause 52.219-9. This written explanation must be submitted to the Lease Contracting Officer within 30 days of contract completion.
3. **[Company Name]** will not prohibit a subcontractor from discussing with the Lease Contracting Officer any material matter pertaining to the payment to or utilization of a subcontractor.
4. **[Company Name]** assures that the offeror will pay its small business subcontractors on time and in accordance with the terms and conditions of the subcontract, and notify the Lease Contracting Officer if **[Company Name]** pays a reduced or an untimely payment to a small business subcontractor (see FAR clause [52.242-5](#)).

#### **XV. COMMITMENT TO MAKE A GOOD FAITH EFFORT<sup>24</sup> (Also refer to 13 CFR 125.3(d), Determination of Good Faith Effort as well as FAR 19.705-7)**

*In order to demonstrate your compliance with a good faith effort to achieve the small business subcontracting goals, outline the steps below that your company plans to take.*

**[Company Name]** will take the following steps to demonstrate compliance with a good faith effort in achieving small business subcontracting goals:

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<sup>24</sup> Described in SBA regulations at 13 CFR125.3(d)(3) as well as FAR 19.705-7

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The above requirements will be negotiated with the Lease Contracting Officer prior to approval. The Lease Contracting Officer must ensure per FAR 19.705-5(a)(5) that an acceptable plan is incorporated into and made a material part of the contract.

**XVI. STATUTORY REQUIREMENTS (FAR 19.702 and FAR clause 52.219-9(c))**

The undersigned recognizes the statutory requirements for a subcontracting plan. The subcontracting plan will be negotiated with the Lease Contracting Officer in the time specified. The plan must be approved prior to contract award, option exercise, or renewal. The Lease Contracting Officer must ensure per FAR 19.705-5(a)(5) that an acceptable plan is incorporated into and made a material part of the contract. Failure to submit and negotiate the subcontracting plan shall make the Offeror ineligible for award of a contract.

As stated in [15 U.S.C. 637\(d\)\(8\)](#) as implemented under FAR 52.219-16, *Liquidated damages*, any contractor or subcontractor failing to comply in good faith with the requirements an approved subcontracting plan required by the clause of the contract “Utilization of Small Business Concerns” shall be a **material breach of the contract and may be considered in any past performance evaluation of the Contractor**. Further, [15 U.S.C. 637\(d\)\(4\)\(F\)](#) directs that a contractor’s **failure to make a good faith effort** to comply with the requirements of the subcontracting plan shall result in the imposition of liquidated damages.

**SIGNATURE REQUIRED:** *Plan must be signed and dated by a company official.*

SUBMITTED by:

Signature:

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Typed Name:

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Company Title:

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Date Signed:

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**Government Lease Contracting Officer APPROVAL<sup>25</sup>:**

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<sup>25</sup> [Lease] Contracting Officer may indicate their approval by signing the plan, although not required. Approval is indicated when the negotiated subcontracting plan becomes a material part of the lease usually as an Exhibit upon award as required by FAR 19.705-5(a)(5) and FAR clause 52.219-9(c)(1).

Signature:

Printed Name:

Agency:

Date Signed: