November 8, 2013

To: UMBC Principle Investigators and Business Managers

From: UMBC Office of Sponsored Programs and Department of Procurement

RE: Small Business Subcontracting Plans for Proposal Submissions

Federal law mandates that all federal contracts in excess of $650,000 must have a federally approved Subcontracting Plan in place. Such plans set percentage and dollar goals for subcontracts to be awarded to small businesses, small disadvantaged businesses, small woman-owned businesses and small businesses located in Historically Underutilized Business Zones (HUBzones). Subcontracts to HBCU/MI (historically black colleges and universities/ minority institutions) are also strongly encouraged for these large federal contracts. The definition of subcontracts in this instance includes vendors.

When PI's compete for federal contracts in excess of $650,000, only the goals for that particular contract need be established and approved by the federal sponsor. This is achieved by completing and attaching a Subcontracting Plan to the submitted proposal. The sponsoring agency should have a Subcontracting Plan Form as part of the solicitation instructions. The Subcontracting Plan is used to record the individual goals that have been determined for each specific contract.

PI's need to forward completed Subcontracting Plan Form to the Procurement Office for review, approval, and signature. Please send your request to Procurement at least 3 weeks in advance of your proposal deadline. Procurement can be contacted at ext. 5-2273 for assistance on determining appropriate percentage goals for use of small or minority owned businesses. Proposals that require a Subcontracting Plan should arrive in OSP with a Subcontracting Plan Form already signed by Procurement. OSP will not sign any Subcontracting Plan form.

PI's can determine the status/eligibility of potential subcontractors on-line via the Small Business Administration's database of Central Contractor Registration (http://www.ccr.gov/).

After a project is awarded to UMBC, there will be mandatory subcontracting reporting requirements. The required reporting forms, SF-294 and SF-295 are available on Procurement’s website: http://www.umbc.edu/adminaffairs/procurement/department.shtml. Please note that PIs/Depts do not submit either the SF-294 or SF-295. Submission of these forms is the responsibility of the Procurement office.

Questions about when to include the Subcontracting Plan in a proposal should be addressed to the OSP Manager assigned to your college or department.