

## **SBA Vendor Communication Plan**

The Small Business Administration's (SBA) Vendor Communication Plan (VCP) is a reference to provide clear and consistent direction to our workforce when communicating with our industry partners. This VCP is intended to serve as a high-level plan and to be general in nature. The SBA will continue to work with the Office of Federal Procurement Policy in the development of best practices, training opportunities, and other communication avenues that may present themselves.

### **1) Statement of Commitment:**

SBA is committed to communicating early, frequently, and constructively with industry and in particular, small businesses. As the agency responsible for tracking and reporting on the Small Business Utilization Goals for federal contracting, SBA has a keen interest in enhancing communication and developing the pool of existing and potential government vendors. The agency is always looking for new ways to identify opportunities for promoting our mission. In doing so, SBA remains committed to protecting non-public and confidential information gathered, generated, or acquired during the acquisition process.

### **2) Senior Agency Officials Responsible for Promoting Vendor Engagement:**

SBA's Chief Acquisition Officer (CAO) is ultimately responsible for vendor engagement and is assisted by the agency's Senior Procurement Executive (SPE) and other senior agency stakeholders.

### **3) Efforts to Reduce Barriers and Promote Vendor Engagement:**

On October 1, 2010, SBA transitioned the acquisition function to the Office of Chief Financial Officer (OCFO) with primary operations being conducted in SBA's Denver Finance Center. As part of the transition, the Acquisition Division has initiated an on-going training program for Agency personnel. This includes both specialized topics for the operational contracting workforces as well as the non-acquisition personnel who make up the overall acquisition team. Instruction has been and will continue to be provided as to how and when to conduct market research and engagement, what constitutes market research and engagement, as well as clarification as to what topics are appropriate in communicating with prospective vendors. Information, training materials and guidance is continually being developed and made available to all Agency personnel.

Specific examples of barriers to competition relevant to SBA's procurements include late submission of acquisition packages and insufficient market research. These issues are being addressed by the on-going training mentioned above as well as:

- The development of internal guidance to define deadlines for procurements at certain dollar threshold and establishing a Contract Review Board (CRB) in order to determine the priority of acquisitions with accelerated proposal times.
- Determining standard Procurement Administrative Lead Times (PALTs) and distributing them to agency program offices to manage expectations on short proposal response times.

- Providing training and guidance to the agency COTRs to ensure adequate market research is conducted and complete procurement packages are submitted.

SBA has two other very important offices that serve the small business community, the National Ombudsman Office with the mission to assist small businesses when they experience excessive or unfair federal regulatory enforcement actions; and the Office of Advocacy which mission is to be an independent voice for small businesses with the federal government and is the watchdog for the Regulatory Flexibility Act.

#### **4) Criteria for Vendor Engagement in Large, Complex Acquisitions:**

By mission and execution, SBA does not engage in many acquisitions which would meet the typical classification of a large or complex acquisition. SBA, does however, engage in some unique endeavors such as disaster response, small business loans and associated services, and special research topics are areas where the Agency could benefit from industry outreach. Also, all long standing awards which have not seen extensive competition should be considered for early outreach. Beginning with the collection of information for the FY 2012 Advance Acquisition Strategy (AAS), the Acquisition Division, in conjunction with the Agency Offices will identify upcoming projects which might benefit from industry outreach. Understanding that the planning and execution of an acquisition can cross fiscal years, it is optimal to begin outreach early and even in the idea stage of a program/project lifecycle. Agency Offices should identify potential candidates for outreach on their FY 2012 and future AAS's, and then work closely with the Acquisition Division on an outreach strategy. These strategies can include but are not limited to Request for Information/Sources, scheduled and advertised forums to address a particular program challenge, as well as generating a public discussion on the SBA public website.

All new acquisitions should be planned to allow for a minimum of thirty (30) days formal, posted advertisement on the Government Point of Entry. More complex, unique or high risks projects should consider advertisement periods of forty-five to sixty (45-60) days. Additionally, service type work should include a planned overlap of at least thirty (30) days to allow for clearances.

In FY 2012 and forward, the Acquisition Division will continue to work with its Agency partners to further refine Procurement Administrative Lead Times (PALTs). Current plans include time for preaward discussions or conferences. For the identified, more complex or unique projects Agency partners should work with the assigned Contracting Officer to plan for extended lead times for discussion and information exchange.

Although it is anticipated the volume of SBA efforts necessitating this additional level of engagement will be limited, those efforts identified for this level of effort may require justification for expeditious processing when planning and execution times do not provide sufficient opportunity for outreach.

#### **5) Improved Publication of Engagement Events:**

SBA routinely advertises, promotes and engages in events such as industry days and small business outreach in regards to our mission of promoting small businesses and small business utilization. In discharging these responsibilities Agency personnel should be attuned to directing potential vendors to the internal needs of the Agency. Most Government-wide outreach events provide opportunity for vendor/Government engagement and these opportunities can be used to facilitate the internal needs of the

Agency. Publication of various engagement events and internal Agency needs are currently posted and updated on the following websites:

- Federal Business Opportunities (<https://www.fbo.gov>)
- Grants.gov (<http://www.grants.gov>)
- The Federal Register (<http://www.gpoaccess.gov/fr>)
- SBA external webpage ([www.sba.gov](http://www.sba.gov))

Examples of previous and ongoing outreach/exchanges include: annual agency co-sponsored Small Business and Minority Enterprise Development Week in Washington, DC focusing on small business accomplishments, including disaster recovery, exporting, mentor/protégé, procurement and entrepreneurial success. During both events attendees had the unique opportunity to participate in meetings with corporate and Federal buyers who had contracts to be filled by small businesses; along with OMB and the Department of Commerce developed the Interagency Task Force on Federal Contracting Opportunities for Small Businesses; and participation in conferences such as the OSDBU Procurement Conference, Small Business Week Conference, National Ombudsman Meetings and Conferences, and the Annual National Veteran Small Business Conference and Expo and the Minority Enterprise Development Conference.

## **6) Roles and Responsibilities:**

As per Federal Acquisition Regulation (FAR) Subpart 1.602-2 – Responsibilities: Contracting officers are responsible for ensuring performance of all necessary actions for effective contracting, ensuring compliance with the terms of the contract, and safeguarding the interests of the United States in its contractual relationships. In order to perform these responsibilities, contracting officers should be allowed wide latitude to exercise business judgment. Contracting officers shall: a) ensure that the requirements of 1.602-1(b) have been met, and that sufficient funds are available for obligation; b) ensure that contractors receive impartial, fair, and equitable treatment; and c) request and consider the advice of specialists in audit, law, engineering, information security, transportation, and other fields, as appropriate. As can be developed, more definitive guidance will be generated, published and briefed. From an overarching perspective and particular to vendor communications:

- Chief Acquisition Officer (CAO)/Senior Procurement Executive (SPE) – Responsible for developing overall policy, procedure and guidance regarding outreach parameters and objectives.
- Contracting Officers – Advise and assist in the execution of the policy, procedure and/or guidance, in particular they advise non-acquisition staff regarding parameters for engagements and from Program/Project Manager or COTR provided data/information, prepare and publish outreach information and depending on medium used for outreach, consolidate and distribute information received. Contracting Officers serve as the source selection authority when awarding contracts and facilitate most communication engagement activities. CO's use information gained through the vendor communication exchange process to plan acquisition methodology including contract type, level of small business participation, and appropriateness of multiple awards, payment structure, and evaluation criteria. CO's generally advise other members of the acquisition team on parameters of vendor exchanges.

- Program Managers and COR/COTRs – Develop objectives and topics for outreach as well as plan exchanges into published PALTs.
- General Counsel’s Office and Ethics Officers – Advise and assist with the development of policy, procedure and guidance to assist the acquisition department fulfill its mission effectively. These offices provide guidance and opinions to agency officials to ensure the proper conduct of interactions with industry.
- OSDBU and Office of Government Contracting and Business Development- Assist in promoting and conducting outreach, particularly to small businesses. Conducts small business outreach conferences and meetings to assist businesses in understanding agency business practices and procedures and small business contracting opportunities.

## **7) Training and Awareness for Employees and Contractors:**

SBA is firmly committed to providing adequate training to the agency’s employees and contractor augmentation staff. In conjunction with the FY 2010 transition of the operational Acquisition staff, personnel to the new Division began conducting recurring training for Program/Project Managers, COTRs and all persons involved with acquiring goods and/or services for the Agency. For Federal Acquisition Certification (FAC) covered positions, continuous learning points are issued. For 4<sup>th</sup> Quarter FY 2011, monthly presentations are planned. Beginning 1<sup>st</sup> Quarter FY 2012 monthly session will be provided and training thereafter will include at least a Quarterly event.

Additionally, SBA’s office of Government Contracting and Business Development (GCBD) is in constant contact with private small businesses nationwide to ensure access to federal contracts. GCBD coordinates the certification piece of major small business programs such as 8(a) and Hubzone, these programs provide the small business community with critical information and priority access to federal contracting dollars.

## **8) Links to Existing Policies:**

- SBA’s Contracting Webpage - <http://www.sba.gov/category/navigation-structure/contracting>
  - This website has additional information on certification under specific small business programs and general information on SBA’s procurements.
- Strategic Plan - [http://www.sba.gov/sites/default/files/serv\\_strategic\\_plan\\_2010-2016.pdf](http://www.sba.gov/sites/default/files/serv_strategic_plan_2010-2016.pdf)
  - This document outlines the agency’s strategic goals and objectives, including the role played by SBA’s acquisition division.
- Federal Acquisition Regulations - <http://farsite.hill.af.mil/vffara.htm>
  - A database of all FAR regulations is available online at the above address.

## **9) Follow-up Plans to Refine and Improve Vendor Communication:**

SBA will re-visit this Vendor Communication Plan 6 month after it is posted to gauge its effectiveness on reaching stakeholders, including COs, Contract Specialists, CORs/POs and vendors. SBA will be able to better identify the overall effectiveness of outreach efforts at that time. Revisions to this VCP will be made as necessary.