

Research Administration Network Agenda

SUB Lobo A & B

February 12, 2019

9:00am to 10:00am

1. Subcontract spending plans - Robert Ortiz, Purchasing
2. COI Presentation - Sue Marker, COI
3. Subaward Budget Revisions – Hannah Clark, OSP
4. Effort Certification Updates and Reminders – Jessica Armijo, C&G
5. PI Org Codes for quicker award setup – Teresa Hammitt, C&G
6. Grants Management Training for PI's – Betsy Drellack, OSP
7. On-campus office hours and Department Administrator Training – Chris Saxton and Jeremy Hamlin
8. OSP & C&G Surveys to go out to key research stakeholders at UNM (PI's, Research Administrators, etc.)

UNM Purchasing Department

Small Business Program Review

Robert Ortiz, UNM Purchasing

In an effort to maintain compliance, the following presentation is a review of information regarding UNM's Small Business Program:

- Requirements of a compliant Small Business Program.
- Audit requirements.
- Current actives of the UNM Small Business Program.

Requirements of a compliant Small Business Program

- An active SBLO, responsible for the entire supplier diversity program of the organization
 - SBLO Letter of Appointment
 - Policy letter from organization's President supporting the program
 - Organizational chart illustrating the access the SBLO has to administer the program and relationship to the University's leadership.
- Small Business Program Policy and Procedures manual
- Develops Small Business Subcontracting Plans (SBSP) for Federal Agency contracts, proposals, and modifications in accordance with RFP/Contract Terms and Conditions.
 - Must establish two sets of subcontracting goals, one for the first tier and one for lower tier subcontractors.
- SBLO works closely with PI's and OSP during proposal development to ensure all SB sections are completed and requirements are met. SBLO should be reviewing RFP documents.

Requirements of a compliant Small Business Program

- Maintain “tracker” spreadsheet with all contracts and EPA grants, dates, funding, account numbers, contract numbers, etc.
- Develop source lists and guides to identify suppliers.
- Monitors certifications per contract.
- Requires all self-certification forms be kept on file.
- Supplier diversity form to be completed with all new vendors.
- Notification to each unsuccessful small business offeror that outlines CFAR and FAR requirements for procurements.
- Conducts internal and external training.
- Outreach program: attends Small Business trainings, events and conferences, networks with local suppliers.

Requirements of a compliant Small Business Program

- Updates policy memorandums and internal procedures to reflect changes to Public Laws, FAR, CFR, etc.
- Prepares semiannual Individual Subcontract Reports (ISR) and annual Subcontract Summary Reports (SSR).
 - If a contract has a subcontracting plan requirement, SSR should include spending monies from all contracts and grants from that agency, even those that do not have a subcontracting plan requirement.
 - Submits accurate and on time reporting.
 - CPO must annually review and sign Summary Subcontract Reports.
- Letter to CPO on progress of Small Business Program after each reporting period.
- Meets small business goals and maintains measurement of efforts.
- EPA grant reporting requirements to be determined.
- Obtaining, approving and monitoring the subcontracting plans of lower-tiered contractors.

Audit Requirements

- Validation of methodology – from how ISR and SSR reports are prepared, to examining purchase orders and vendor certifications.
- Five year trend analysis.
- Overall evaluation of our program to determine internal dedication and commitment to our Small Business Program.
- Organizational chart illustrating the relationship SBLO has to University leadership and department heads to best administer the Small Business Program.
- Reviewing Small Business Subcontracting Plan goals and actual achievements.
- Purchase order analysis made to non-small business vendors with federal dollars.
- Determine if flow-down subcontracting plans have been required and reported as applicable.
- Reviewing sourcing efforts.
- Confirming that Small Business vendors are being paid per UNM payment terms.
- Follow-up on all recommendations made by the SBA to improve program.

Current Activities of the UNM Small Business Program

- Creating subcontracting plans.
- Verifying and validating vendors through the federal SAM system.
- Filing semiannual ISR and annual SSR.
- SSR does not contain all award data. This will require reporting on additional contracts and grants.
- Updating supplier diversity with current vendors, manually, and cannot be used in lieu of self certification or SAM verification.
- Work with research groups and administrators to meet small business spending goals on open contracts.

Risk to the University

- Risk of breach of current contracts, because the Small Business Subcontracting Plan becomes part of the contract with the agency.
- Receiving negative performance ratings for noncompliance on closed contracts.
- Liquidated damages for failing to comply with the Small Business Subcontracting Plan put forward.
 - FAR 52.219-16 (f) “Liquidated damages shall be in addition to any other remedies that the Government may have.”
- Future award dollars.