

Allen Corporation of America, Inc. (Allen Corporation)

SMALL BUSINESS SUBCONTRACTING PLAN

I. IDENTIFICATION DATA:

Address: 10400 Eaton Place, STE 450, Fairfax, VA, 22030-2208

Date Prepared: April 28, 2015

Description of Supplies/Services: Professional and Management Development Training

Solicitation Number: GS02Q15CRR0001

Contract Number: TBD

Individual Plan Period: Base: Date of Award through Five Years **Option 1:** Date of Award thru Five Years
Option 2: Date of Award through Six Months

Estimated Contract Value

Base Period: \$500,000 Option Period 1: \$500,000 Option Period 2: \$50,000

Place of Performance: CONUS

DUNS Number: 007102168

II. TYPE OF PLAN – FAR 19.701 (*For definitions, see Cover Page and FAR clause 52.219-9*):

 Commercial Plan

 X **Individual Plan**

 Master Plan (incorporated into Individual Plan)

III. GOALS:

Allen Corporation provides the following separate dollar and percentage goals, which are a percentage of the total subcontracting dollars:

BASE GOALS are expressed in dollars and percentages of the total dollars planned to be subcontracted.		
PLANNED SUBCONTRACTING TO:	DOLLARS	PERCENT
1. Total Dollars to be Subcontracted	\$250,000	100%
2. Large Businesses (Other than Small)	\$125,000	50%
3. All Small Businesses (including ANCs & Indian tribes)	\$125,000	50%
4. Veteran-Owned Small Businesses (VOSB)	\$7,500	3%
5. Service-Disabled Veteran-Owned Small Businesses (SDVOSB)	\$7,500	3%
6. HUBZone Small Business (HUBZone)	\$7,500	3%
7. Small Disadvantaged Businesses (SDB) (including ANCs & Indian tribes)	\$12,500	5%
8. Women-Owned Small Businesses (WOSB)	\$12,500	5%

If applicable:

1ST OPTION GOALS are expressed in dollars and percentages of total dollars planned to be subcontracted.		
PLANNED SUBCONTRACTING TO:	DOLLARS	PERCENT
1. Total Dollars to be Subcontracted	\$250,000	100%
2. Large Businesses (Other than Small)	\$125,000	50%
3. All Small Businesses (including ANCs & Indian tribes)	\$125,000	50%
4. Veteran-Owned Small Businesses (VOSB)	\$7,500	3%
5. Service-Disabled Veteran-Owned Small Businesses (SDVOSB)	\$7,500	3%
6. HUBZone Small Business (HUBZone)	\$7,500	3%
7. Small Disadvantaged Businesses (SDB) (including ANCs & Indian tribes)	\$12,500	5%
8. Women-Owned Small Businesses (WOSB)	\$12,500	5%

If applicable:

2ND OPTION GOALS are expressed in dollars and percentages of total dollars planned to be subcontracted.		
PLANNED SUBCONTRACTING TO:	DOLLARS	PERCENT
1. Total Dollars to be Subcontracted	\$25,000	100%
2. Large Businesses (Other than Small)	\$12,500	50%
3. All Small Businesses (including ANCs & Indian tribes)	\$12,500	50%
4. Veteran-Owned Small Businesses (VOSB)	\$450	3%
5. Service-Disabled Veteran-Owned Small Businesses (SDVOSB)	\$450	3%
6. HUBZone Small Business (HUBZone)	\$450	3%
7. Small Disadvantaged Businesses (SDB) (including ANCs & Indian tribes)	\$1,250	5%
8. Women-Owned Small Businesses (WOSB)	\$1,250	5%

The principal types of supplies and/or services that Allen Corporation anticipates to be subcontracted and the identification of the type of business concern planned are as follows:

Business Category or Size

Supplies/Services	Large	Small	VOS B	SDVOS B	HUBZone	SDB	WOS B
Management Consulting		<u>X</u>	<u>X</u>	<u>X</u>			
Information Technology		X			X	X	
Personnel	<u>X</u>						
Misc. Services		X	X	X	X	X	<u>X</u>
Logistics Support Services	<u>X</u>						

Allen Corporation used the following method to develop the subcontracting goals:

Allen Corporation was strategically established with the ability to provide a complete range of logistics support, management consulting and training solutions. This plan was developed with the goal of significant representation of various types of businesses (e.g., WOB, SB). All subcontracting goals, establishment of subcontracted services and products were developed with consideration to historical data, compliance with the terms and conditions outlined in the Request for Proposal (RFP).

Allen Corporation identifies potential subcontractors using the following source lists and organizations:

- System for Award Management (SAM)
- Dynamic Small Business Search (DSBS)
- Veteran-Owned Business Website
- Department of Veteran Affairs Office of Small and Disadvantaged Business Utilization
- DOD Office of Small Business Programs
- US Small Business Administration Office of Small and Disadvantaged Business Programs
- Federal Business Opportunities (FEDBIZOPS)
- Local Command/Agency Small Business Offices
- Small Business Conferences and Seminars
- Allen listing of previously used subcontractors
- Other sources as needed

To establish the right team for the right job and ensure we are on target for meeting our subcontracting goals, Allen Corporation will maintain a matrix of qualifications, business categorization, and performance of potential subcontractor capabilities. We will also assess the staff capacity of team members and their ability to support the schedule and technical requirements of the contract.

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

IV. PROGRAM ADMINISTRATOR:

Name: Mr. William Cline

Title/Position: Manager, Contracts Administration

Address: 10400 Eaton Place, Suite 450,

City/State/Zip Code: Fairfax, VA 22030

Telephone number: (571) 321-1610

Fax number: : (571) 321-1662

Email Address: wcline@allencorporation.com

Alternate POC with contact information: Mr. Timothy Schimkus, CFO, 10400 Eaton Place, Suite 450, Fairfax, VA 22030, (571) 321-1606, (571) 321-1662, tschimkus@allencorporation.com

Duties: In accordance with clause 52.219-9(d)(11)(e), in order to effectively implement this plan to the extent consistent with efficient contract performance, the contractor shall perform the following functions:

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. 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.
7. Develop and maintain bidders' lists of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns from all possible sources.
8. Ensure periodic rotation of potential subcontractors on bidders' lists.
9. 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.
10. Ensure that subcontract procurement "packages" are designed to permit the maximum possible participation of SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns
11. Review subcontract solicitations to remove statements, clauses, etc., which might tend to restrict or prohibit SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns.
12. 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.

13. Oversee the establishment and maintenance of contract and subcontract award records.
14. Attend or arrange for the attendance of company counselors at Business Opportunity Workshops, Minority Business Enterprise Seminars, Trade Fairs, etc.
15. Directly or indirectly counsel SB, VOSB, SDVOSB, HUBZone, SDB and WOSB concerns on subcontracting opportunities and how to prepare bids to the company.
16. Conduct or arrange training for purchasing personnel regarding the intent and impact of Section 8(d) of the Small Business Act on purchasing procedures.
17. Develop and maintain an incentive program for buyers that support the subcontracting program.
18. Monitor the company's performance and make any adjustments necessary to achieve the subcontract plan goals.
19. Prepare and submit timely reports.
20. Coordinate the company's activities during compliance reviews by Federal agencies.

V. EQUITABLE OPPORTUNITY:

Allen Corporation 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:

A. Outreach efforts to obtain sources:

- Contacting minority and small business trade associations
- Contacting business development organizations
- Requesting sources from the U.S. Small Business Administration Dynamic Small Business Search, which integrated data from the SBA PRO-Net database
- 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:

- Utilize Deltek GovWin Website
- Utilize newspaper and magazine ads to encourage new sources.

VI. ASSURANCES OF CLAUSE INCLUSION AND FLOW DOWN:

Allen Corporation 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 \$650,000 (\$1,500,000 for construction) to adopt a plan that complies with the requirements of the clause at [52.219-9](#), Small Business Subcontracting Plan.

VII. REPORTING AND COOPERATION:

Allen Corporation 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 Individual Subcontract Report (ISR), 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 ISR and/or the SSR using the eSRS;
- (v) Provide its prime contract number and its DUNS number 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 that each subcontractor with a subcontracting plan provide the prime contract number and its own DUNS number, 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>	<i>Submit Reports to eSRS with email address for:</i>
10/01--03/31	ISR	04/30	Contracting Officer/SBTA
04/01--09/30	ISR	10/30	Contracting Officer/SBTA
10/01--09/30	SSR	10/30	Contracting Officer/SBTA

THE eSRS WEB-BASED REPORTING REQUIREMENT INSTRUCTIONS CAN BE FOUND IN THE ATTACHMENT TO SUBCONTRACTING PLAN TAKEN FROM FAR CLAUSE 52-219-9.

VIII. RECORDKEEPING:

Allen Corporation 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 \$150,000, 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:

IX. STATUTORY REQUIREMENTS (Found at FAR 19.702)

- Any contractor 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.
- It is further the policy of the United States that its prime contractors establish procedures to ensure the timely payment of amounts due pursuant to the terms of their subcontracts with SB (including ANCs and Indian tribes), VOSB, SDVOSB, HUBZone, SDB (including ANCs and Indian tribes), and WOSB concerns.
- See 19.702(a)(1) for requirements that are imposed in negotiated acquisitions, and (a)(2) for requirements that are imposed in sealed bidding acquisitions.
- As stated in [15 U.S.C. 637\(d\)\(8\)](#), any contractor or subcontractor failing to comply in good faith with the requirements of the subcontracting plan is in **material breach of its contract**. 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 (see 19.702(c) and 19.705-7).

X. DESCRIPTION OF GOOD FAITH EFFORT (Also refer to 13 CFR 125.3(d), Determination of Good Faith Effort)

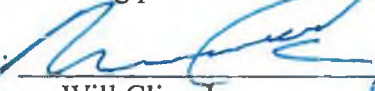
Allen Corporation will take the following steps to demonstrate compliance with a good faith effort in achieving small business subcontracting goals:

Allen Corporation has a proven and successful record subcontracting to small businesses and consistently meets or exceeds most of its small business (SB), small disadvantaged business (SDB), women-owned small business (WOSB), veteran-owned small business (VOSB), and historically under-used business zone (HUBZone) business goals. The targeted dollars and subcontracting goals illustrated in Allen Corporation's Small Business Subcontracting Plan for this contract formally establishes Allen's commitment to the objectives of the Small Business Act. Further, it provides a formal document and source of information for all Allen staff involved in creating and taking advantage of new business opportunities. Allen realizes the substantial competence and professionalism represented by the nation's SB, SDB, WOSB, and HUBZone firms, and looks forward to affording opportunities to all parties to expand their business base. Accordingly, this plan is designed to capitalize on the synergistic talents and opportunities of Allen and its teammates, and to comply with the provisions of Public Law.

The above requirements will be negotiated with the contracting officer prior to approval. The 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.

SIGNATURE REQUIRED:

This subcontracting plan was SUBMITTED by:

Signature:  _____
Typed Name: Will Cline Jr. _____
Company Title: Manager, Contract Administration _____
Date Signed: 4 February 2016

Government Contracting Officer APPROVAL:

Signature: _____
Printed Name: _____
Agency: _____
Date Signed: _____