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Agency Information Collection Activities; Proposals, Submissions, and Approvals: Subcontracting Plans

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Submitter Information

Name: Anonymous Anonymous

General Comment

This response is submitted in support of the proposal to eliminate the requirement for collecting subcontracting plans in Federal acquisitions. The process of creating, maintaining, and reporting subcontracting plans imposes significant administrative burdens without a corresponding benefit that cannot already be achieved through existing reporting mechanisms.

1. Administrative Burden Detracts from Small Business Utilization Efforts

Preparing individual subcontracting plans involves time-consuming data collection, forecasting, and compliance activities. Contractors must frequently revise and resubmit plans to align with shifting contract and subcontracting values. These burdens extend to both contractors and government personnel tasked with evaluating and monitoring compliance, diverting valuable time and resources from efforts that could more directly support small business engagement. Eliminating this requirement would allow contractors to focus on creating meaningful subcontracting opportunities rather than navigating bureaucratic hurdles.

2. Redundancy with Existing Summary Subcontracting Reporting Mechanisms

The Summary Subcontracting Report (SSR), already submitted annually by contractors, provides a comprehensive overview of small business utilization on a per-agency basis. These reports effectively fulfill the same purpose as individual subcontracting plans by offering insights into small business engagement and ensuring compliance with Federal goals. This centralized reporting mechanism avoids duplication while allowing agencies to monitor progress and compliance at an aggregate level.

3. Enhanced Efficiency Through Streamlined Compliance

Streamlining compliance requirements is consistent with broader Federal efforts to modernize acquisition processes, reduce administrative burdens, and improve efficiency. Agencies and contractors can better allocate resources toward fostering partnerships with small businesses and achieving performance-based outcomes if duplicative requirements, like subcontracting plans, are removed.

4. Leveraging Technology for Smarter Oversight

Advancements in automated data collection and reporting technologies provide an opportunity to modernize small business oversight without requiring individual subcontracting plans. Agencies could leverage these technologies to analyze SSR data and identify trends, challenges, and opportunities for improvement.

In conclusion, removing the subcontracting plan requirement aligns with Federal goals to reduce unnecessary administrative burdens and foster a more dynamic, innovative, and inclusive acquisition ecosystem. By focusing on the practical and streamlined oversight provided by SSRs, agencies can continue to support small business participation while promoting greater efficiency and effectiveness in Federal procurement processes.

Thank you for the opportunity to provide these comments.