



## DEFENSE CONTRACT MANAGEMENT AGENCY

3901 A AVENUE, BUILDING 10500  
FORT LEE, VA 23801-1809

Dan Schultz  
President  
Sikorsky Aircraft  
6900 Main Street  
Stratford, CT 06615-9129

April 17, 2017

Dear Mr. Schultz,

The results of your *Small Business Subcontracting Program Compliance Review* covering October 1, 2015 through September 30, 2016 under the DoD Test Program for Negotiation of Comprehensive Small Business Subcontracting Plans and performed on February 8-9, 2017 in accordance with Federal Acquisition Regulations (FAR) 19.706 resulted in a final rating Satisfactory.

Details of the compliance review are enclosed and annotated on the DCMA Form 640.

If you have questions or concerns, please contact Luz Vasquez, who can be reached at

(b) (6)

or via email (b) (6)

EVELYN-  
BELLAMY.TATIAM.122  
8577665  
Tatia Evelyn-Bellamy

Director, Small Business Office  
Small Compliance Center

Digitally signed by EVELYN-  
BELLAMY.TATIAM.1228577665  
DN: c=US, o=U.S. Government, ou=DoD,  
ou=PKI, ou=DCMA, cn=EVELYN-  
BELLAMY.TATIAM.1228577665  
Date: 2017.04.17 10:41:11 -0400

Enclosures:  
DCMA Compliance Review Form

cc: Martha Crawford, SBLO  
Amy Johnson, Director, Supply Management  
Owen Whitehurst, Senior Attorney Operations  
Kim Gaskin, DCMA DACO  
Sandy Liu, CMR, SBA  
Dr. James Galvin, OSBP  
Janice Buffler, OSBP  
Norman Willis, Air Force  
Jean Smith, Air Force  
Lee Rosenberg, MDA  
Jerrol Sullivan, MDA  
Kenneth Carkhuff, Navy  
Emily Harman, Navy  
Pamela Monroe, Army

**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Acknowledged receipt of annual meeting notice  
**Date:** Thursday, February 7, 2019 2:01:25 AM  
**Attachments:** [Scanned from a Xerox multifunction device.pdf](#)

---

-----Original Message-----

**From:** Crawford, MARTHA (b) (6)  
**Sent:** Tuesday, June 21, 2016 3:20 PM  
**To:** Sharp, Charles E CIV DCMA (US) (b) (6)  
**Subject:** [Non-DoD Source] Acknowledged receipt of annual meeting notice

Charles,  
Attached please find Sikorsky's signed acknowledgement.

Regards,

Martha L. Crawford  
Supplier Diversity Manager/ SBLO  
Sikorsky Aircraft Corporation  
O (b) (6) | M (b) (6)  
NEW EMAIL: (b) (6)

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-----Original Message-----

**From:** Crawford, MARTHA (US)  
**Sent:** Tuesday, June 21, 2016 4:19 PM  
**To:** Crawford, MARTHA (US)  
**Subject:** EXTERNAL: Scanned from a Xerox multifunction device

Please open the attached document. It was scanned and sent to you using a Xerox multifunction device.

Sent by: sikuscommercial\s30858 (b) (6)

Number of Images: 2

Attachment File Type: pdf, Multi-Page

multifunction device Location: 1\DMC\Stratford\CT\USA\

Device Name: PRX125

Device Serial Number: XKP536327

multifunction device IP Address: 140.76.100.90

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**LMC0001521**

**MSJ002787**

**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Change in Lockheed Martin participation at the DOD meeting  
**Date:** Thursday, February 7, 2019 12:45:05 AM

---

-----Original Message-----

From: Raheb, Susannah L [REDACTED]  
Sent: Friday, August 14, 2015 12:07 PM  
To: Sharp, Charles E CIV DCMA (US) [REDACTED]  
Subject: RE: Change in Lockheed Martin participation at the DOD meeting

Hello Charles,

I have received and forwarded the notice to Mary Ellen and Kurt. Thanks for checking. I noticed in the distribution there's two versions of my email address. The one with the "1" is not correct [REDACTED] I just wanted to point out in case there's a master distribution list.

Thanks and have a great weekend,  
Suzanne

-----Original Message-----

From: Sharp, Charles [[mailto:\[REDACTED\]](#)]  
Sent: Friday, August 14, 2015 12:24 PM  
To: Raheb, Susannah L  
Subject: EXTERNAL: RE: Change in Lockheed Martin participation at the DOD meeting

Did you get the email about the location change.

Charles E. Sharp  
Acting Assistant Director  
DCMA Small Business Center  
Comprehensive Subcontracting Program Division DCMA-AQSCC  
1523 Central Road, Bldg 203  
Arlington Heights, IL. 60005  
Ph# (b) (6) Fax# (b) (6)  
(b) (6)  
(b) (6)

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<<https://pubapp.dcma.mil/CustSat/main.jsp>> to help us better support your needs.

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-----Original Message-----

From: Raheb, Susannah L [mailto:(b) (6)]

Sent: Friday, August 14, 2015 10:49 AM

To: Sharp, Charles

Cc: Fraser, MaryEllen; Vasquez, Luz; Sorenson, Lee; Ravenfeld, Kurt R; Buffler, Janice L CIV OSD OUSD ATL (US); Robinson, Linda L CTR OSD OUSD ATL (US)

Subject: Change in Lockheed Martin participation at the DOD meeting

Hello Charles,

Due to an unanticipated schedule conflict, Kurt Ravenfeld will now be attending the DOD Office of Small Business Programs meeting on August 17 from 2-4 p m. on Lockheed Martin's and Lee Sorenson's behalf. Hopefully, it is not too late to make this change.

The following are the two Lockheed Martin representatives who will be in attendance:

- . Kurt Ravenfeld, Director, Global Supply Chain Operations, Lockheed Martin Corporation
- . Mary Ellen Fraser, Director, Washington Operations, Lockheed Martin Corporation

Mary Ellen and Kurt will plan to be at the Pentagon's Visitor Lobby before 1:30 p m. to allow for time to get checked-in and escorted to the meeting location.

I have included Janice and Linda in this email to ensure they are notified of this change.

Sincerely,  
Suzanne Raheb

Suzanne Raheb  
Corporate Supplier Diversity Leader  
Lockheed Martin Corporation  
100 Global Innovation Circle, MP 836, Orlando, FL 32825  
c: (b) (6)

-----

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**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: CSP Annual Communication Meeting Request-July 21, 2016:Looking for more. LH / SIK #16  
**Date:** Thursday, February 7, 2019 12:12:07 AM  
**Attachments:** [memo signed.pdf](#)

---

-----Original Message-----

**From:** Raheb, Susannah L (b) (6)  
**Sent:** Monday, June 27, 2016 12:37 PM  
**To:** Sharp, Charles E CIV DCMA (US) (b) (6)  
**Subject:** [Non-DoD Source] RE: CSP Annual Communication Meeting Request-July 21, 2016

Charles,  
 Sorry. Please see attached signature page.

Respectfully,  
 Suzanne

-----Original Message-----

**From:** Sharp, Charles [mailto:](#) (b) (6)  
**Sent:** Monday, June 27, 2016 1:00 PM  
**To:** Raheb, Susannah L (US) <(b) (6)>  
**Subject:** EXTERNAL: RE: CSP Annual Communication Meeting Request-July 21, 2016

I need the signed memo's letters back asap.

Charles E. Sharp  
 Small Business Professional  
 DCMA Small Business Compliance Center  
 Small Business Specilized Support Group  
 DCMA-AQSCC  
 1523 Central Road, Bldg 203  
 Arlington Heights, IL. 60005  
 Ph# (b) (6) Fax# (b) (6)  
 (b) (6)  
 (b) (6)

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 <<https://pubapp.dema.mil/CustSat/main.jsp>> to help us better support your needs.

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-----Original Message-----

From: Raheb, Susannah L [mailto:(b) (6)]  
 Sent: Friday, June 24, 2016 10:50 AM  
 To: Sharp, Charles  
 Cc: Vasquez, Luz; Fraser, MaryEllen; Ravenfeld, Kurt R  
 Subject: [Non-DoD Source] RE: CSP Annual Communication Meeting Request-July 21, 2016

Hello Charles,

I wanted to confirm Lockheed Martin's participation at the DOD July 21st meeting. We will have three representatives as follows:

Susannah Raheb, Corporate SBLO

Kurt Ravenfeld, Global Supply Chain Operations Director Mary Ellen Fraser, Government Relations Director

Thank you very much,  
 Suzanne

Suzanne Raheb  
 Corporate Supplier Diversity Leader  
 Lockheed Martin Corporation  
 100 Global Innovation Circle, MP 836, Orlando, FL 32825  
 c: (b) (6)

-----

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-----Original Message-----

From: Evelyn-Bellamy, Tatia M. [mailto:(b) (6)]  
 Sent: Tuesday, June 21, 2016 12:06 PM  
 To: (b) (6); (b) (6); Raheb, Susannah L (US)  
 (b) (6); Crawford, MARTHA (US) (b) (6)  
 Cc: Sharp, Charles (b) (6); Vasquez, Luz <(b) (6)>; Vaughn, Michele <(b) (6)>; Stephens, Micole (b) (6); Gainer, Stephanie A. (b) (6); Claud, Eric (b) (6); Buffler, Janice L CIV OSD OUSD ATL (US) (b) (6); Pugh, Anthony R CTR (US) (b) (6); Davis, Kimberly D CIV DCMA (US) (b) (6); Callahan, Timothy P. (SES) <(b) (6)>  
 Subject: EXTERNAL: CSP Annual Communication Meeting Request-July 21, 2016  
 Importance: High

CSP Participants,

The attached memorandum regarding subject above is being sent to you on behalf of DoD OSBP. We look forward to your participation.

Tatia M. Evelyn-Bellamy  
Director, Small Business Office  
/Small Business Center  
Small Business Ombudsman  
Defense Contract Management Agency  
Phone (b) (6)  
Email (b) (6)

"One team, one voice delivering global acquisition insight that matters."

**LMC0001526**

**MSJ002792**



**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: CSP Annual Communication Meeting Request-July 21, 2016:Looking for more.  
**Date:** Thursday, February 7, 2019 1:07:52 AM  
**Attachments:** [memo signed.pdf](#)

---

-----Original Message-----

**From:** Raheb, Susannah L (b) (6)  
**Sent:** Monday, June 27, 2016 12:37 PM  
**To:** Sharp, Charles E CIV DCMA (US) (b) (6)  
**Subject:** [Non-DoD Source] RE: CSP Annual Communication Meeting Request-July 21, 2016

Charles,  
 Sorry. Please see attached signature page.

Respectfully,  
 Suzanne

-----Original Message-----

**From:** Sharp, Charles [mailto:\(b\) \(6\)](#)  
**Sent:** Monday, June 27, 2016 1:00 PM  
**To:** Raheb, Susannah L (US) (b) (6)  
**Subject:** EXTERNAL: RE: CSP Annual Communication Meeting Request-July 21, 2016

I need the signed memo's letters back asap.

Charles E. Sharp  
 Small Business Professional  
 DCMA Small Business Compliance Center  
 Small Business Specilized Support Group  
 DCMA-AQSCC  
 1523 Central Road, Bldg 203  
 Arlington Heights, IL. 60005  
 Ph# (b) (6) Fax# (b) (6)  
 (b) (6)  
 (b) (6)

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 <<https://pubapp.dema.mil/CustSat/main.jsp>> to help us better support your needs.

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-----Original Message-----

From: Raheb, Susannah L [mailto:(b) (6)]  
 Sent: Friday, June 24, 2016 10:50 AM  
 To: Sharp, Charles  
 Cc: Vasquez, Luz; Fraser, MaryEllen; Ravenfeld, Kurt R  
 Subject: [Non-DoD Source] RE: CSP Annual Communication Meeting Request-July 21, 2016

Hello Charles,

I wanted to confirm Lockheed Martin's participation at the DOD July 21st meeting. We will have three representatives as follows:

Susannah Raheb, Corporate SBLO  
 Kurt Ravenfeld, Global Supply Chain Operations Director Mary Ellen Fraser, Government Relations Director

Thank you very much,  
 Suzanne

Suzanne Raheb  
 Corporate Supplier Diversity Leader  
 Lockheed Martin Corporation  
 100 Global Innovation Circle, MP 836, Orlando, FL 32825  
 c: (b) (6)

-----  
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-----Original Message-----

From: Evelyn-Bellamy, Tatia M. [mailto:(b) (6)]  
 Sent: Tuesday, June 21, 2016 12:06 PM  
 To: (b) (6); (b) (6); Raheb, Susannah L (US)  
 (b) (6); Crawford, MARTHA (US) (b) (6)  
 Cc: Sharp, Charles (b) (6); Vasquez, Luz (b) (6); Vaughn, Michele  
 (b) (6); Stephens, Micole (b) (6); Gainer, Stephanie A.  
 <(b) (6)>; Claud, Eric (b) (6); Buffler, Janice L CIV OSD OUSD ATL  
 (US) <(b) (6)>; Pugh, Anthony R CTR (US) (b) (6); Davis,  
 Kimberly D CIV DCMA (US) (b) (6); Callahan, Timothy P. (SES)  
 (b) (6)  
 Subject: EXTERNAL: CSP Annual Communication Meeting Request-July 21, 2016  
 Importance: High

CSP Participants,

The attached memorandum regarding subject above is being sent to you on behalf of DoD OSBP. We look forward to your participation.

Tatia M. Evelyn-Bellamy  
Director, Small Business Office  
/Small Business Center  
Small Business Ombudsman  
Defense Contract Management Agency  
Phone: (b) (4)  
Email: (b) (4)

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**LMC0001529**

**MSJ002795**

**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: eSRS LM Comprehensive Subcontracting Plan - FASI-G, SPE7L115D0011  
**Date:** Thursday, February 7, 2019 12:27:58 AM

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-----Original Message-----

From: Turner, Marjorie H DLA CIV LAND AND MARITIME (b) (6)  
 Sent: Tuesday, November 10, 2015 3:57 PM  
 To: Vasquez, Luz M CIV DCMA (US) (b) (6)  
 Cc: Holder, Erica N (b) (6); (b) (6); Bunnell, Thomas L DLA CIV LAND AND MARITIME (b) (6); Sharp, Charles E CIV DCMA (US) (b) (6); Alter, Natalie A DLA CIV LAND AND MARITIME (b) (6)  
 Subject: RE: eSRS LM Comprehensive Subcontracting Plan - (b) (4)

Thanks much Luz,

This does help greatly.

I currently have access to eSRS system and have not been successful in getting stated report below.

Is the report input under another contract number other than above? I've even searched by DUNS# (b) (4) Is it possible to provide me with a copy?

Thanks much.

M

-----Original Message-----

From: Vasquez, Luz [mailto:\(b\) \(6\)](#)  
 Sent: Tuesday, November 10, 2015 2:50 PM  
 To: Turner, Marjorie H DLA CIV LAND AND MARITIME  
 Cc: Holder, Erica N (b) (6); Bunnell, Thomas L DLA CIV LAND AND MARITIME; Sharp, Charles; Alter, Natalie A DLA CIV LAND AND MARITIME  
 Subject: RE: eSRS LM Comprehensive Subcontracting Plan - (b) (4)

Certainly can help you with that but I will twist your question below to read a comprehensive subcontracting plan. LM negotiates a comprehensive subcontracting plan yearly. This plan is a Corporate plan and applies to ALL DOD contracts under LM umbrella to include (b) (4) your contract. The dollars reported under the SSR report are inclusive of all DoD contracts. LM do not report on individual subcontracting goals unless the contract itself before award required them to provide a CDRL with individual goals to be submitted to the CO or the CO requested our office the negotiation of program level reporting during our negotiation cycle (August each year). I don't think neither situation applies to this contract; however, LM submits a SSR semi-annually. Last report was submitted on October 28, 2015. The report can be obtained by requesting access to the eSRS system.

Hope this helps! And let me know if there are any other questions

Luz M. Vasquez

Defense Contract Management Agency  
 Comprehensive Subcontracting Division  
 Small Business Center  
 Office: (b) (6)  
 BB: (b) (6)



-----Original Message-----

From: Turner, Marjorie H DLA CIV LAND AND MARITIME [mailto:(b) (6)]  
 Sent: Tuesday, November 10, 2015 1:17 PM  
 To: Vasquez, Luz  
 Cc: Holder, Erica N (b) (6); Bunnell, Thomas L DLA CIV LAND AND MARITIME; Alter, Natalie A DLA CIV LAND AND MARITIME  
 Subject: RE: eSRS LM Comprehensive Subcontracting Plan - (b) (4)

Hello Luz,

Re: our today's conversation regarding subject above.

Your brief explanation to an individual sub plan would be greatly appreciated for the above contract so I may pass the info on to my management team. I'm glad we were able to finally connect.

Thanks much in advance.

Marjorie H. Turner  
 BCA (b) (6), LM AND SC  
 DLA LAND/MARTIME/SAPD/ZDC  
 (b) (6)

(b) (4) takes a village!

-----Original Message-----

From: Raheb, Susannah L [mailto:(b) (6)]  
 Sent: Friday, November 06, 2015 4:01 PM  
 To: Turner, Marjorie H DLA CIV LAND AND MARITIME; Holder, Erica N  
 Cc: DeCastro, Maria (b) (6); Berotte, William; Bunnell, Thomas L DLA CIV LAND AND MARITIME  
 Subject: [Non-DoD Source] RE: eSRS LM Comprehensive Subcontracting Plan -

Hello Marjorie,

This is good timing. Our SSR was just accepted for Sept. 30, 2015. Luz Vasquez is our DCMA program manager. Her email address is: (b) (6) The CSP is not included in the SSR. It's primarily our small business performance and program and agency level reports.

If you need further assistance or if you run into any issues with receiving a copy, please let me know. I can just forward to you.

Sincerely,  
 Suzanne

-----Original Message-----

From: Turner, Marjorie H DLA CIV LAND AND MARITIME [mailto:(b) (6)]  
 Sent: Friday, November 06, 2015 3:54 PM  
 To: Raheb, Susannah L (US); Holder, Erica N (US)  
 Cc: DeCastro, Maria (b) (6); Berotte, William (US); Bunnell, Thomas L DLA CIV LAND

AND MARITIME

Subject: EXTERNAL: RE: eSRS LM Comprehensive Subcontracting Plan -

Hi Suzanne,

I'm the BCA for Lockheed Martin, (b) (4) I'm just trying to get a copy of what is submitted and accepted in the eSRS system.

Do you know who on the DCMA government side is the POC/reviewer/accepter that could provide a copy?

Is the CSP even input into eSRS?

Thanks for any assistance and direction.

Marjorie H. Turner  
BCA (b) (4), LM AND SC  
DLA LAND/MARTIME/SAPD/ZDC  
(b) (6)

-----Original Message-----

From: Raheb, Susannah L [mailto:(b) (6)]  
Sent: Friday, November 06, 2015 3:38 PM  
To: Holder, Erica N; Turner, Marjorie H DLA CIV LAND AND MARITIME  
Cc: DeCastro, Maria (b) (6); Berotte, William; Bunnell, Thomas L DLA CIV LAND AND MARITIME  
Subject: [Non-DoD Source] RE: eSRS LM Comprehensive Subcontracting Plan

Hi Erica,

I have received this email, but I am not sure what exactly is needed. Can you please let me know my action? I'll respond as quickly as possible since it appears this got lost in the email.

Thanks,  
Suzanne

-----Original Message-----

From: Holder, Erica N (US)  
Sent: Thursday, November 05, 2015 4:26 PM  
To: Turner, Marjorie H DLA CIV LAND AND MARITIME; Raheb, Susannah L (US)  
Cc: DeCastro, Maria (b) (6); Berotte, William (US); Bunnell, Thomas L DLA CIV LAND AND MARITIME  
Subject: RE: eSRS LM Comprehensive Subcontracting Plan

Hi Marjorie,

Susannah Raheb is currently out of the office on business travel yesterday and today. Also I realized that her email was incorrect because it was missing the "L" from the email address. I've included her correct email and I'm sure she will respond to this email and or phone call as soon as she is available.

Best regards,

Erica N. Holder  
Contracts Negotiator, Stf.  
Lockheed Martin  
(b) (6)

-----Original Message-----

From: Turner, Marjorie H DLA CIV LAND AND MARITIME [mailto:(b) (6)]  
Sent: Thursday, November 05, 2015 1:04 PM  
To: Holder, Erica N (US) (b) (6)  
Cc: DeCastro, Maria (b) (6); Berotte, William (US)  
(b) (6); Bunnell, Thomas L DLA CIV LAND AND MARITIME  
(b) (6)  
Subject: EXTERNAL: RE: eSRS LM Comprehensive Subcontracting Plan

Erica,

Re: below. No response yet.

From email traffic below, DLA was trying to connect with POC since May 2015.  
Is the above a good email for Susannah? Her voice message system doesn't identify her, I left one message to whom I don't know.

How does LM connect with her?

Thanks,  
Marjorie

-----Original Message-----

From: Turner, Marjorie H DLA CIV LAND AND MARITIME  
Sent: Wednesday, November 04, 2015 12:46 PM  
To: 'Holder, Erica N'; (b) (6)  
Cc: Bunnell, Thomas L DLA CIV LAND AND MARITIME; Alter, Natalie A DLA CIV LAND AND MARITIME;  
Berotte, William; Ezcurra, Joaquin  
Subject: RE: eSRS LM Comprehensive Subcontracting Plan

Thanks Erica. I tried several times to call without success, hopefully the email ending is the same.

-----  
Susannah,

Re: subject above and below traffic.

Would it be possible to receive the eSRS data report for LM, (b) (4) for Sept 2015?

Thanks much in advance.

Marjorie

-----Original Message-----

From: Holder, Erica N [mailto:(b) (6)]  
Sent: Wednesday, November 04, 2015 12:29 PM  
To: Turner, Marjorie H DLA CIV LAND AND MARITIME  
Cc: Bunnell, Thomas L DLA CIV LAND AND MARITIME; Alter, Natalie A DLA CIV LAND AND MARITIME;  
Berotte, William; Ezcurra, Joaquin

Subject: [Non-DoD Source] FW: eSRS LM Comprehensive Subcontracting Plan

Hi Marjorie,

Here is the information provided last May on accessing the LM CSP in the eSRS system. The LM POC is Susannah L. Raheb's and her information is as follows:

Susannah L. Raheb  
Title: Corporate SBLO  
Phone Number: (b) (6)

Best regards,

Erica N. Holder  
Contracts Negotiator, Stf.  
Lockheed Martin  
(b) (6)

-----Original Message-----

From: Holder, Erica N  
Sent: Tuesday, May 19, 2015 10:51 AM  
To: 'Turner, Marjorie H DLA CIV LAND AND MARITIME' (b) (6)  
Subject: RE: eSRS LM Comprehensive Subcontracting Plan

Marjorie,

BTW, I believe the document I provided is the transmittal form for the submittal of the Summary Subcontract Report into the eSRS system. You may have to use the Duns #: (b) (4) and following addressed provided in the document.

Vendor Name: Lockheed Martin Corporation Vendor Physical Address: 6801 Rockledge Drive Bethesda, Maryland 20817

I hope this is helpful.

Best regards,

Erica N. Holder  
Contracts Negotiator, Stf.  
Lockheed Martin MST Moorestown  
Tel: (b) (6)  
Fax: (b) (6)

(b) (6)

-----Original Message-----

From: Holder, Erica N  
Sent: Tuesday, May 19, 2015 10:46 AM  
To: 'Turner, Marjorie H DLA CIV LAND AND MARITIME'  
Subject: RE: eSRS LM Comprehensive Subcontracting Plan

Hi Marjorie,

Susannah L. Raheb's contact information is provided on page two of the document as follows:



Susannah L. Raheb  
Title: Corporate SBLO  
Phone Number: (b) (6)

Also, you may want to contact the DCMA POC that I provided in the email below. As they should also be able to provide you the information you need.

Best regards,

Erica N. Holder  
Contracts Negotiator, Stf.  
Lockheed Martin MST Moorestown  
Tel: (b) (6)  
Fax: (b) (6)

(b) (6)

-----Original Message-----

From: Turner, Marjorie H DLA CIV LAND AND MARITIME [mailto:(b) (6)]  
Sent: Tuesday, May 19, 2015 10:26 AM  
To: Holder, Erica N  
Subject: EXTERNAL: RE: eSRS LM Comprehensive Subcontracting Plan

Morning Erica,

Re: your attachments sent. Do you have a number for Susannah L. Raheb?  
Like Lagertha's email stated it needs to be in the eSRS system, <http://www.esrs.gov/> for accepting or rejecting.

M

-----Original Message-----

From: Holder, Erica N [mailto:(b) (6)]  
Sent: Thursday, May 14, 2015 3:51 PM  
To: Turner, Marjorie H DLA CIV LAND AND MARITIME  
Subject: eSRS LM Comprehensive Subcontracting Plan

Hi Marjorie,

Attached is a copy of the LM March 2015 Summary Subcontracting Report for the Comprehensive Report. Please contact the DCMA Primary or Secondary POC's (b) (6) and (b) (6) <mailto:(b) (6)> for additional information.

Also, I was unable to find my return communication to LaGertha beyond the attached email back in 2012 but I know we discussed this and believe it was understood that LM submits and has submitted a comprehensive plan since the inception of the program.

Please let me know if you need anything else.

Best regards,

Erica N. Holder

Contracts Negotiator, Stf.

Lockheed Martin MST Moorestown

Tel: (b) (6)

Fax: (b) (6)

(b) (6)

**LMC0001536**

**MSJ002802**

**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Final Request for Signed 2016 Comprehensive Subcontracting Plan  
**Date:** Thursday, February 7, 2019 1:48:22 AM

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**From:** Duffey, Janet L SIK (b) (6)  
**Sent:** Monday, October 5, 2015 12:36 PM  
**To:** Stephens, Micole <(b) (6)>; Johnson, Amy M SIK  
(b) (6)  
**Cc:** Crawford, Martha SIK (b) (6); Sharp, Charles E CIV DCMA (US)  
(b) (6)  
**Subject:** RE: Final Request for Signed 2016 Comprehensive Subcontracting Plan

We understand Micole. We had some internal revisions, the final document is in to our President, Bob LeDuc for signature and he realizes the urgency. Our goal is to get it back to you by the end of today.

Regards, Janet

*Janet Duffey*  
*Vice President Supply Management*  
*Sikorsky Aircraft*  
(b) (6)

---

**From:** Stephens, Micole [[mailto:\(b\) \(6\)](#)]  
**Sent:** Monday, October 05, 2015 1:12 PM  
**To:** Johnson, Amy M SIK; Duffey, Janet L SIK  
**Cc:** Crawford, Martha SIK; Sharp, Charles  
**Subject:** [External] Final Request for Signed 2016 Comprehensive Subcontracting Plan

To Ms. Amy Johnson and Ms. Janet Duffey,

DCMA has made repeated request to obtain the final negotiated signed 2016 Comprehensive Subcontracting Plan(CSP). It is imperative that signatures on the 2016 CSP be obtained. Signatures are needed immediately for Coverage of the 2016 CSP. Failure to provide the 2016 signed CSP will result in all Sikorsky DoD contracts that contain the Small Business clause to transition from the Comprehensive Subcontracting Test Plan to Individual Subcontracting Plans. An Immediate response is required(COB 10/5/15).

Respectfully,  
Micole Stephens  
Small Business Professional

Comprehensive Subcontracting Program  
DCMA Small Business Center/DCMA-AQSCC  
1523 West Central Road  
Arlington Heights, IL 60005

(b) (6)

-fax

(b) (6)

– Blackberry

Email address:

(b) (6)

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**LMC0001538**

**MSJ002804**



**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: follow up  
**Date:** Thursday, February 7, 2019 1:34:53 AM

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**From:** Johnson, Amy M SIK (b) (6)  
**Sent:** Friday, August 21, 2015 10:50 AM  
**To:** Sharp, Charles E CIV DCMA (US) (b) (6)  
**Subject:** follow up

Good morning Charles,

It was good to see you again on Monday at the CSP meeting. Lots of informative dialog with everyone.

I left you a voice message yesterday since I wanted to talk with you about your availability for a Sikorsky meeting requested in our response to the 640 review.

Do you have time today to talk about scheduling this meeting? I can be reached at (b) (6)

Thank you,  
Amy

**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: FY16 Subcontract Management Plan  
**Date:** Thursday, February 7, 2019 12:37:18 AM  
**Importance:** High

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**From:** Raheb, Susannah L (b) (6)  
**Sent:** Thursday, October 1, 2015 11:41 AM  
**To:** Vasquez, Luz M CIV DCMA (US) (b) (6); Sharp, Charles E CIV DCMA (US) (b) (6)  
**Subject:** FW: FY16 Subcontract Management Plan  
**Importance:** High

Luz and Charlies,

We already have a situation where we have a proposal that requires the CSP and I need your help please. The SBA Deputy Area Director for NAVAIR, Mr Johnston is advising our F-35 Customer that we need to negotiate an Individual Subcontracting Plan (ISP) because we don't have a CSP in place. They have requested the ISP by October 8 with justification if the goals don't meet the statutory goals. Can either of you please contact Mr. Johnston and let him know an extension letter is imminent? His contact number is below. I want to avoid having to go through the effort of creating an ISP when the extension letter will meet the requirement. Any help will be greatly appreciated.

---

MR. RANDALL S. JOHNSTON  
Deputy Area Director  
Procurement Center Representative  
U.S. Small Business Administration  
Office of Government Contracting, Area II  
Naval Air Station – Patuxent River  
22473 Millstone Rd. B505  
Patuxent River, MD 20670-1127  
Tel: (b) (6)  
E-Fax: (b) (6)  
Email: (b) (6)

-----Original Message-----

**From:** Connolly, Kate M  
**Sent:** Thursday, October 01, 2015 10:31 AM  
**To:** Tanksley, Jim J (US) (b) (6)  
**Subject:** FW: FY16 Subcontract Management Plan

FYI - Should I make Suzanne aware of this and let these people know that we are awaiting signature on an extension, or should we proceed with an ISP?

-----Original Message-----

From: Coyle, Robert J (US)  
Sent: Thursday, October 01, 2015 10:23 AM  
To: Connolly, Kate M (b) (6)  
Subject: FY16 Subcontract Management Plan

Kate,

Do you have an estimate on when the FY16 CSP plan will be complete? As you see in the email below, JPO is asking us to draft an individual plan for our FY16A contract. I'd prefer to tell them that we will have this overall plan complete in the next two months because it seems like it would take longer to draft an individual plan, review and negotiate it with the government.

Thanks,  
Bob

-----Original Message-----

From: Sepe, Etta M Civ OUSD (AT&L) JSF [mailto:(b) (6)]  
Sent: Thursday, October 01, 2015 7:33 AM  
To: Coyle, Robert J (US) (b) (6); Thompson, Rene Y Civ OUSD (AT&L) JSF (b) (6); Gates, Daron (US) (b) (6); Farrell, Kelly L (US) (b) (6); Joseph, Connie (b) (6); Johnson, Jerry L Civ OUSD (AT&L) JSF (b) (6); Veneziano-Martin, Vinita J Civ OUSD (AT&L) JSF (b) (6); Roche, Mallory S CIV NAWC 1.3, PMA-265 (b) (6); Veneziano-Martin, Vinita J Civ OUSD (AT&L) JSF (b) (6)  
Cc: Zavertrnik, Brian T Civ OUSD (AT&L) JSF (b) (6); Stierer, Kristina M Civ OUSD (AT&L) JSF (b) (6); Luu, Michael T Civ OUSD (AT&L) JSF (b) (6)  
Subject: EXTERNAL: RE: LMPI: RELEASED: Subcontract Management Plan, (b) (4) - Lockheed Martin Proprietary Information

Bob,

I spoke with Mr. Johnston, the SBA Deputy Area Director for NAVAIR, yesterday concerning LM's lack of a Comprehensive Master Subcontracting Plan. He advised me that if the comprehensive Master Subcontracting Plan for Lockheed Martin is not negotiated in time for our FY16A contract award, then JSF will need to negotiate an Individual Subcontracting Plan for this effort. That negotiation is dependent upon the cognizant DCMA and the Contracting Officer's due diligence in attempting to negotiate subcontracting goals that are in line with the FY 16 Department of Defense small business goals, while taking into consideration the limitations that the JSF Program has for its current and future subcontractor strategy.

Since we are only 2 months away from potential contract award, the JSF PCO believes that we need to

begin negotiating an Individual Subcontracting Plan per the SBA Deputy Area Director's guidance. This Individual Subcontracting Plan will need a waiver signed one level above the PCO. We will need a justification from LM if LM is unable to meet the DoD subcontracting goals and achievements located at:

[https://www.sba.gov/sites/default/files/files/FY14\\_DoD\\_SB\\_Procurement\\_Scorecard\\_Public\\_View\\_2015-04-29.pdf](https://www.sba.gov/sites/default/files/files/FY14_DoD_SB_Procurement_Scorecard_Public_View_2015-04-29.pdf)

This justification will need to be reviewed at the Division Director level. Please send the LM draft Individual Subcontracting Plan to JSF at LM's earliest convenience, but we would prefer NLT 3PM EST Thursday, October 8th. Thank you in advance for your time and assistance with this matter.

Best,  
Marie

v/r,  
Marie Sepe, PhD  
Contract Specialist  
F-35 Lightning II Joint Program Office - Sustainment  
2450 Crystal Drive, Suite 800, 827D  
Arlington, VA 22202

(b) (6)  
[Redacted]  
[Redacted]

**LMC0001542**

**MSJ002808**

**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Lockheed Martin acknowledgement of Receipt  
**Date:** Thursday, February 7, 2019 12:47:10 AM  
**Attachments:** [LM signed letter.pdf](#)

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**From:** Raheb, Susannah L (b) (6)  
**Sent:** Monday, August 3, 2015 12:00 PM  
**To:** Sharp, Charles E CIV DCMA (US) (b) (6)  
**Cc:** Vasquez, Luz M CIV DCMA (US) (b) (6); Buffler, Janice L CIV OSD OUSD  
ATL (US) (b) (6)  
**Subject:** Lockheed Martin acknowledgement of Receipt

Good afternoon Charles,  
Please find enclosed Lockheed Martin's signed acknowledgement of receipt from the DCMA letter dated July 31, 2015 on the subject: Request for Fiscal Year 2016 Comprehensive Subcontracting Plan Guidance.

Sincerely,  
Susannah Raheb

**Suzanne Raheb**

Corporate Supplier Diversity Leader  
Lockheed Martin Corporation  
100 Global Innovation Circle, MP 836, Orlando, FL 32825  
c: (b) (6)

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**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Lockheed Martin Extension Request Letter  
**Date:** Thursday, February 7, 2019 12:35:19 AM  
**Attachments:** [LM\\_CSP\\_extension\\_letter\\_response\\_10\\_28\\_2015.pdf](#)

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**From:** Raheb, Susannah L (b) (6)  
**Sent:** Wednesday, October 28, 2015 7:19 AM  
**To:** Evelyn-Bellamy, Tatia M. (b) (6)  
**Cc:** Vasquez, Luz M CIV DCMA (US) (b) (6); Sharp, Charles E CIV DCMA (US) (b) (6); Ravenfeld, Kurt R (b) (6)  
Sorenson, Lee (b) (6)  
**Subject:** Lockheed Martin Extension Request Letter

Good morning Tatia,

Thank you again for providing Lockheed Martin with an extension for continued coverage to the GFY 2016 CSP. Please find enclosed our formal response to the extension letter and action. If you have any questions or concerns, please do not hesitate to contact me. My cell phone number is (b) (6)

Sincerely,  
Suzanne Raheb

**Suzanne Raheb**

Corporate Supplier Diversity Leader  
Lockheed Martin Corporation  
100 Global Innovation Circle, MP 836, Orlando, FL 32825  
c: (b) (6)



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**LMC0001545**

**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Lockheed Martin GFY16 Negotiations Response  
**Date:** Thursday, February 7, 2019 12:25:30 AM  
**Attachments:** [LM\\_DCMA\\_goal\\_response\\_11\\_20.pdf](#)

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**From:** Raheb, Susannah L (b) (6)  
**Sent:** Friday, November 20, 2015 7:21 AM  
**To:** Evelyn-Bellamy, Tatia M. (b) (6)  
**Cc:** Vasquez, Luz M CIV DCMA (US) (b) (6); Sharp, Charles E CIV DCMA (US) (b) (6); Ravenfeld, Kurt R (b) (6)  
**Subject:** [Non-DoD Source] Lockheed Martin GFY16 Negotiations Response

Hello Tatia,

It was nice seeing you at the National Veterans Conference. Hopefully, your presentation went well and you made it home safely.

We have completed an updated forecast assessment. Our overall goals went up as a result. Please find enclosed an attachment memo with our updated goals. If you have any questions or concerns, please do not hesitate to contact me. My cell phone number is (b) (6)

I look forward to hearing back from you.

Thank you and have a great weekend,  
Suzanne

**Suzanne Raheb**

Corporate Supplier Diversity Leader  
Lockheed Martin Corporation  
100 Global Innovation Circle, MP 836, Orlando, FL 32825  
c (b) (6)

---



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**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Lockheed Martin Response to GFY15 CSP Goals  
**Date:** Thursday, February 7, 2019 12:48:19 AM

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-----Original Message-----

From: Raheb, Susannah L (b) (6)  
 Sent: Wednesday, July 8, 2015 11:53 AM  
 To: Vasquez, Luz M CIV DCMA (US) (b) (6)  
 Cc: Sharp, Charles E CIV DCMA (US) (b) (6)  
 Subject: RE: Lockheed Martin Response to GFY15 CSP Goals

Luz,  
 Thanks. So here's how I listed Charles on the title page. Please let me know if this is correct?

Charles Sharp  
 Acting Assistant Director, Small Business Center Comprehensive Subcontracting Program Group Defense Contract Management Agency

Also, I am getting updated numbers from the business areas for the table, so I should have the final version to you tomorrow by noon.

Thanks,  
 Suzanne

-----Original Message-----

From: Vasquez, Luz ([mailto:\(b\) \(6\)](#))  
 Sent: Wednesday, July 08, 2015 8:49 AM  
 To: Raheb, Susannah L  
 Cc: Sharp, Charles  
 Subject: EXTERNAL: RE: Lockheed Martin Response to GFY15 CSP Goals  
 Importance: High

Good Morning Suzanne,

Please update the goal section and the signature page to replace Margarrette's name with Charles Sharp, same title, he is the acting Assistant Director and will be signing this document along with Tatia. E-mail updated signed document to me for our signatures. Once all parties sign, We will make distribution of LM FY15 CSP plan.

Have a great day!  
 Luz M. Vasquez  
 Small Business Professional  
 Comprehensive Subcontracting Program  
 DCMA Small Business Center/DCMA-AQSCC  
 office: (b) (6)  
 Gov. Cell (b) (6)

DCMA appreciates your feedback. Please provide feedback by clicking on  
<https://pubapp.dcma.mil/CustSat/main.jsp><<https://bluemaat1.dcma.mil/owa/redirect.aspx?C=b9955337a0d84bbb8c8045bdf0d373ce&URL=https%3a%2f%2fpubapp.dcma.mil%2fCustSat%2fmain.jsp>> to

help us better support your needs. For #1 We fall under Products and Services as Pre-Award Acquisition Planning Support -Small Business Support and under #6 we are listed in the HQ & Center Support dropdown as "DCMA Small Business Center."

---

From: Raheb, Susannah L (b) (6)  
Sent: Friday, July 03, 2015 8:26 AM  
To: Vasquez, Luz; Trimble-Williams, Margarete  
Cc: Ravenfeld, Kurt R; Sorenson, Lee  
Subject: Lockheed Martin Response to GFY15 CSP Goals

Luz,  
Thank you for allowing us an extension to respond to the DCMA formal notification letter. Please find attached Lockheed Martin's formal response. Please let me know if you have further questions or concerns.

Also, I will proceed with updating the CSP accordingly. Please let me know specific changes you would like to see on the document (i.e., DCMA POC information on the front page, etc.)

Sincerely,  
Suzanne

Suzanne Raheb  
Corporate Supplier Diversity Leader  
Lockheed Martin Corporation  
100 Global Innovation Circle, MP 836, Orlando, FL 32825  
c: (b) (6)

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[cid:image001.jpg@01D0B583.0D05EDE0]

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LMC0001548

MSJ002814

**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Please provide status on your FY16 goals  
**Date:** Thursday, February 7, 2019 12:37:44 AM

---

-----Original Message-----

**From:** Raheb, Susannah L (b) (6)  
**Sent:** Monday, September 28, 2015 10:33 AM  
**To:** Sharp, Charles E CIV DCMA (US) (b) (6)  
**Cc:** Vasquez, Luz M CIV DCMA (US) (b) (6)  
**Subject:** RE: Please provide status on your FY16 goals

Hello Charles,

I apologize for the delay in response. I didn't see your email until this morning. Luz and I spoke this morning to discuss goals and I now have the action to bring the counteroffer goals forward to our executives for final review and approval. We now have agreed on 2 or the 6 goals. I will bring this back to our Supply Chain Council to provide a formal response.

The other reason why I wanted to meet with you and Tatia was to make you aware of discussions we've been having with Kenya pertaining to the CSP. Kenya will be at our Lockheed Martin Aeronautics facility tomorrow per his request. He wants to better understand our small business mitigation strategy associated with for the F-35 program. He also invited Emily Harmon and Dr. Galvin since his primary purpose was for them to see the F-35 production assembly line since they are new to program. Mark Teskey was also invited. In addition, there will be a side meeting with Kenya with my VP and Aeronautics procurement VP to discuss our GFY16 goals, drivers, etc., as well as further opportunities to collaborate. If you would like to meet and learn more, please let me know. I will make myself available around your calendar.

Thank you,  
Suzanne

-----Original Message-----

**From:** Sharp, Charles ([mailto:](#) (b) (6))  
**Sent:** Friday, September 25, 2015 6:20 PM  
**To:** Raheb, Susannah L  
**Cc:** Vasquez, Luz  
**Subject:** EXTERNAL: FW: Please provide status on your FY16 goals

Good Evening Susannah,

Can you tell me what are your final SB and SB concerns goals are in response to the DCMA counter-proposed goals for FY16? Please provide immediately. In consideration of time your immediate response will help to expedite scheduling and determining teleconference meeting necessity.

Respectfully

Charles E. Sharp  
Acting Assistant Director  
DCMA Small Business Center  
Comprehensive Subcontracting Program Division DCMA-AQSCC  
1523 Central Road, Bldg 203  
Arlington Heights, IL. 60005  
Ph# (b) (6) Fax# (b) (6)

(b) (6)

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-----Original Message-----

From: Vasquez, Luz  
Sent: Friday, September 25, 2015 4:56 PM  
To: Sharp, Charles  
Subject: FW: Please provide status on your FY16 goals

Charles, LM response is that they want a meeting with us Monday, please see below

Luz

Defense Contract Management Agency  
Comprehensive Subcontracting Division  
Small Business Center  
Office: (b) (6)  
BB (b) (6)

-----Original Message-----

From: Raheb, Susannah L [[\(b\) \(6\)](mailto:(b) (6))]  
Sent: Friday, September 25, 2015 12:33 PM  
To: Vasquez, Luz  
Subject: RE: Please provide status on your FY16 goals

Luz,

I would like to request a meeting with you and the DCMA director(s) (Tatia and/or Charles) involved in the CSP negotiation process to verbally explain our forecast and drivers associated with the GFY16 goals as well as respond back to the DCMA goals. I realize you are out today and this will require coordination of schedules. I will make myself available all day Monday if there's a time that works with your schedules. I also canceled my trip to Fort

Worth, Texas, on Monday so I can solely concentrate on this effort. We are hosting a tour with Kenyata, his deputy Dr. Gavin and the Air Force and Navy OSBP directors on Tuesday. I look forward to your response.

Thank you,  
Suzanne

-----Original Message-----

From: Vasquez, Luz [[mailto:](#)(b) (6)]  
Sent: Friday, September 25, 2015 10:55 AM  
To: Raheb, Susannah L  
Subject: EXTERNAL: Please provide status on your FY16 goals  
Importance: High

Suzanne,

Not sure if you got a chance to talk to DCMA leadership or OSBP, but I need LM response to the gov goals by close of business today. I'm off but will be checking my email periodically.

Thanks  
Luz

Defense Contract Management Agency  
Comprehensive Subcontracting Division  
Small Business Center  
Office (b) (6)  
BB: (b) (6)

**LMC0001551**

**MSJ002817**

**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: REQUEST for Fiscal Year 2016 Comprehensive Subcontracting Plans and Guidance  
**Date:** Thursday, February 7, 2019 12:45:55 AM

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Looking for more.

-----Original Message-----

**From:** Raheb, Susannah L (b) (6)  
**Sent:** Wednesday, August 5, 2015 2:17 PM  
**To:** Sharp, Charles E CIV DCMA (US) (b) (6)  
**Cc:** Fraser, MaryEllen (b) (6); Vasquez, Luz M CIV DCMA (US)  
(b) (6); Sorenson, Lee (b) (6); Ravenfeld, Kurt R  
(b) (6)  
**Subject:** RE: REQUEST for Fiscal Year 2016 Comprehensive Subcontracting Plans and Guidance

Good afternoon Charles and Luz,

This email is to confirm Lockheed Martin's attendance at the DOD Office of Small Business Programs meeting on August 17 from 2-4 p.m. The following Lockheed Martin representatives will attend on the corporation's behalf:

- . Lee Sorenson, Vice President, Global Supply Chain, Information Systems & Global Solutions and Global Supply Chain Operations Chair
- . Mary Ellen Fraser, Director, Washington Operations, Lockheed Martin Corporation

Unfortunately, I will not be able to attend due to a prior commitment with the SBA. However, both Lee and Mary Ellen will relay any pertinent information and actions that results from the meeting.

Sincerely,  
Suzanne Raheb

Suzanne Raheb  
Corporate Supplier Diversity Leader  
Lockheed Martin Corporation  
100 Global Innovation Circle, MP 836, Orlando, FL 32825  
c: (b) (6)

---

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**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Request for extension  
**Date:** Thursday, February 7, 2019 12:36:18 AM  
**Attachments:** [LM request for extension.pdf](#)

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**From:** Raheb, Susannah L (b) (6)  
**Sent:** Wednesday, October 14, 2015 3:50 PM  
**To:** Sharp, Charles E CIV DCMA (US) (b) (6)  
**Cc:** Vasquez, Luz M CIV DCMA (US) (b) (6)  
**Subject:** Request for extension

Charles and Luz,

Per our discussions, please find enclosed an official request for an extension. I will provide a more formal and detailed response following my executive discussions in the next few weeks.

Thank you very much,  
Suzanne

**Suzanne Raheb**

Corporate Supplier Diversity Leader  
Lockheed Martin Corporation  
100 Global Innovation Circle, MP 836, Orlando, FL 32825  
c: (b) (6)

---



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**From:** [Sharp, Charles E CIV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CIV DCMA HQ \(US\)](#)  
**Subject:** FW: Required Signature For FY17 CSP  
**Date:** Thursday, February 7, 2019 2:03:12 AM

---

-----Original Message-----

**From:** Crawford, MARTHA (b) (6)  
**Sent:** Friday, August 12, 2016 7:34 AM  
**To:** Stephens, Micole (b) (6)  
**Cc:** Sharp, Charles E CIV DCMA (US) (b) (6); Richardson, Keith (b) (6)  
**Subject:** [Non-DoD Source] RE: Required Signature For FY17 CSP

Micole,  
This requirement has been duly noted.

Regards,

Martha L. Crawford  
Supplier Diversity Manager/ SBLO  
Sikorsky Aircraft Corporation  
O (b) (6) | M (b) (6)  
NEW EMAIL: (b) (6)

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-----Original Message-----

**From:** Stephens, Micole [mailto:\(b\) \(6\)](#)  
**Sent:** Thursday, August 11, 2016 6:15 PM



To: Crawford, MARTHA (US)  
Cc: Sharp, Charles  
Subject: EXTERNAL: Required Signature For FY17 CSP

Martha,

As you are work on the upcoming submission of the FY17 CSP, please ensure that before submitting the proposed plan to DCMA that it is signed by the binding official of your company. If the FY17 CSP proposal is not signed by the binding official of your company, it will not be accepted and will be considered late. Thanks in advance for your consideration.

Micole Stephens -Mack  
Small Business Professional  
DCMA Small Business Compliance Center/DCMA-AQSCC Small Business Specialized Support Group  
1523 West Central Road  
Arlington Heights, IL 60005

(b) (6)

-fax

(b) (6)

- Blackberry

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and criminal penalties."

**LMC0001555**

**MSJ002821**

**From:** [Sharp, Charles E CTV DCMA \(USA\)](#)  
**To:** [Thomas, Shelly S CTV DCMA HQ \(US\)](#)  
**Cc:** [Vasquez, Luz M CTV DCMA \(US\)](#)  
**Subject:** See Attached  
**Date:** Thursday, February 7, 2019 1:45:22 AM  
**Attachments:** [Request for explanation of Blank Spend.msg](#)  
[RE Request for explanation of Blank Spend.msg](#)

---

Charles E. Sharp  
Small Business Professional  
DCMA Small Business Compliance Center  
Small Business Specialized Support Group  
DCMA-AQSCC  
1523 Central Road, Bldg 203  
Arlington Heights, IL. 60005  
Ph.# (b) (6) Fax# (b) (6)  
(b) (6)

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<<https://pubapp.dema.mil/CustSat/main.jsp>> ; to help us better support your needs.

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**DEFENSE CONTRACT MANAGEMENT AGENCY**  
 Small Business Center – Comprehensive Subcontracting Program Division  
 18901 S. Wilmington Ave.  
 Building DH2, Suite 224N  
 Carson, CA 90746

July 2, 2015

Mr. Bob Leduc, CEO  
 Sikorsky Aircraft Corporation  
 6900 Main Street  
 Stratford, CT 06614

Dear Mr. Leduc,

The results of your Small Business Subcontracting Program review performed on April 28-May 1, 2015 in accordance with Federal Acquisition Regulations (FAR) 19.706 resulted in a final rating of Marginal.

The enclosed DCMA Small Business Subcontracting Program Compliance report (DCMA 640 Form) provides complete details of the review. Based on your current rating, your subcontracting program will be scheduled for a review next year.

If you have questions or concerns, my point of contact is Micole Stephens-Mack, who can be reached at (b) (6) or via email (b) (6)

(b) (6)

Margarette Trimble-Williams  
 Assistant Director  
 DCMA Small Business Center

Enclosures:  
 DCMA Compliance Review Form

cc: Martha Crawford, SBLO  
 Kieth Richardson  
 Amy Johnson  
 Janet Duffey  
 Sandy Liu, SBA  
 Kim Gaskin, DCMA  
 Janice Buffler, OSD, OSBP  
 Military Services:  
 Carol White, Air Force  
 Norman Willis, Air Force  
 Jean Smith, Air Force  
 Pamela Monroe, Army  
 Donald Wagoner, Army  
 Lee Rosenberg, MDA

HQ-CompRating-Dec2014

LMC0001583

MSJ002824

Jerrold Sullivan, MDA  
Laura Adnerson, MDA  
Kenneth Carkhuff, Navy  
Emily Harman, Navy  
Brad Taylor, Navy  
Patricia Obey, Navy  
Katherine Rachubinski, Navy  
Colleen Courtney, Navy  
Gregory S. Lee, Navy

# DEFENSE CONTRACT MANAGEMENT AGENCY (DCMA) REVIEW OF CONTRACTOR'S COMPREHENSIVE SUBCONTRACTING PROGRAM

## PART I – GENERAL INFORMATION

<b>1. CONTRACTOR:</b> Name: Sikorsky Aircraft Corporation (SAC) Address 1: 6900 Main Street Address 2: City/State/Zip: Stratford, CT 06615 CAGE: 78286                      DUNS: 835551474	<b>1.a. SMALL BUSINESS LIAISON OFFICER (SBLO)</b> Name: Martha Crawford Phone: (b) (6)                      FAX: E-mail: (b) (6) <b>1.b. ALTERNATE SMALL BUSINESS LIAISON OFFICER (SBLO)</b> Name: Phone:                      FAX: E-mail:
<b>2. PROGRAM MANAGER, COMPREHENSIVE SUBCONTRACTING PROGRAM</b>  Name: Micol Stephens Phone: (b) (6)                      FAX: E-mail: (b) (6)	<b>3. DIVISION CHIEF, COMPREHENSIVE SUBCONTRACTING PROGRAM</b> Name: Margarette Trimble-Williams Phone: (b) (6)                      FAX: E-mail: (b) (6)
<b>4. SMALL BUSINESS ADMINISTRATION (SBA) COMMERCIAL MARKETING REPRESENTATIVE (CMR) <a href="http://www.sba.gov/GC/cmr.html">http://www.sba.gov/GC/cmr.html</a></b> Name: Sandy Liu Phone:                      FAX: E-mail:	<b>5. ADMINISTRATIVE CONTRACTING OFFICER</b> Name: Kimberly Gaskins Phone: (b) (6)                      FAX: E-mail: (b) (6)

DCMA/SMALL BUSINESS ADMINISTRATION (SBA), JOINT REVIEW:  
☒ Yes                      ☐ No IF NOT, WHY NOT:

Was this an on-site review? ☐ YES ☒ NO      Or, a virtual review? ☒ YES ☐ NO

<b>6. PERIOD COVERED BY THIS REVIEW:</b> 6.a. From: 1 October 2013	<b>7.a. DATE OF THIS REVIEW:</b>  <b>7.b. TYPE OF REVIEW:</b> Virtual Review	<b>8.a. DATE OF LAST REVIEW DATA:</b> April 28-May 1, 2015  <b>8.b. TYPE OF LAST REVIEW DATA:</b> Virtual Review
6.b. To: 30 September 2014	<b>7.c. RATING OF THIS REVIEW DATA:</b> Marginal	<b>8.c. RATING OF LAST REVIEW DATA:</b> Outstanding
	<b>7.d. RISK OF THIS REVIEW DATA:</b> High	<b>8.d. RISK OF LAST REVIEW DATA:</b> Moderate

- 9. DOD RATIOS:**  
 a. Total Annual Company Sales: [REDACTED]  
 b. Total dollar value of contracts that are with DoD (including those without plans): \$ [REDACTED]

**10. TYPE OF SUBCONTRACT PLAN(S):**

- |  |   |
|--|---|
| <input type="checkbox"/> Individual Plan(s): Number of plans:<br><input type="checkbox"/> Commercial Plan: Approving authority:<br><input checked="" type="checkbox"/> Comprehensive Plan: Approving authority:<br><input type="checkbox"/> Master Plan: Approving authority:<br><input type="checkbox"/> Other: Specify Type: | Period Covered From:<br>Period Covered From: October 1, 2013      Period Covered To: September 30, 2014<br>Period Covered From:                      Period Covered To: |
|--|---|

**11. List Contracts Awarded with a Deficient Subcontracting Plan: Not applicable to comprehensive subcontracting plan participants.**

Number of Plans:	Total Face Value: \$	
Noted Discrepancies – Contract Number:	Delivery Order:	Total Face Value \$
Contract Deficiency Report created? <input type="checkbox"/> Yes <input type="checkbox"/> No (retain DD1716)		
Remarks:		
Contract Deficiency Report (DD1716) <input type="checkbox"/> Delete <input type="checkbox"/> Add		

**12. List Contracts Awarded without a Subcontracting Plan, when a Plan was required: Not applicable to comprehensive subcontracting plan participants.**

Number of Plans:	Total Face Value: \$	
Noted Discrepancies – Contract Number:	Delivery Order:	Total Face Value \$
Contract Deficiency Report created? <input type="checkbox"/> Yes <input type="checkbox"/> No (retain DD1716)		
Remarks:		
Contract Deficiency Report (DD1716) <input type="checkbox"/> Delete <input type="checkbox"/> Add		



**PART II – CONTRACTOR’S COMPREHENSIVE SUBCONTRACTING PERFORMANCE****SUBCONTRACTING PERFORMANCE FACTORS***Compliance with FAR requirements in this part establish the basic requirements for an acceptable rating***1. OVERALL SUBCONTRACTING PERFORMANCE – SUMMARY SUBCONTRACTING REPORT (SSR) SUBMISSION (FAR 52-219-9(d) (1), (2) & (10) (iii) & (iv))****a. WERE SSR REPORTS SUBMITTED IN ACCORDANCE WITH FAR REQUIREMENTS AND SSR INSTRUCTIONS?**☐ YES ☒ NO. Identify deficiencies:

The purchases sampled over \$650K in support of the SSR included internal purchases within UTC and Sikorsky. Per the guidance that governs the completion of the SSR that state, eSRS should exclude purchases from a corporation, company, or subdivision that is an affiliate of the prime/subcontractor (reference esrs.symplcity.com User Guides) in its SSR report. DCMA was unable to determine if the internal purchases were included in the FY14 SSR. It is recommended that Sikorsky provide assurances that internal purchases are not included in the SSR's.

It is recommended that the SSR reported to DoD include only dollars attributed to DoD. Reference the esrs.symplcity.com site, User Guides for items to be excluded from this report.

The Allocation Rate was applied as the Indirect subcontracting rate on the FY14 SSR. It is recommended that the be removed from the DoD allocation rate. Sikorsky has an internal SBLO manual and Standard Work Instructions that correctly describes the application of the Indirect Subcontracting Rate. After review, it was determined that Sikorsky did not follow the instructions provided in their manual. It is recommended that the correct application of the indirect rate be applied to the dollars reported on the SSR or elect not to include indirect subcontracting in your subcontracting plan.

When the SSR was completed, the information was not preserved at the time of submission. As a result, transactions made after that date had an impact on the purchase orders that are a part of the FY14 SSR. Sikorsky was unable to go reproduce a report that displays the dollar amounts reported on the FY14 SSR. It is Recommend that Sikorsky take a snapshot of the Purchase order file the moment that the SSR is completed, so that the SSR can be duplicated.

Purchases in support of Speculative Sales are included in the dollars reported on the SSR. It is recommended that Sikorsky attribute a DoD prime/subcontract contract number for all dollars counted toward DoD performance goals. Reference the esrs.symplcity.com site, User Guides for items that should be excluded from this report.

DCMA will reject your FY14 based on these findings.

**b. VERIFY ACCURACY OF SSR REPORTS:**

Sikorsky was unable to provide supporting documentation to DCMA to verify the accuracy of the FY14 SSR.

**c. PERFORM TREND ANALYSIS OF PAST PERFORMANCE (Last 5 years, if available) AND DISCUSS TRENDS, POSITIVE OR NEGATIVE:**

NOTE: Local spreadsheets, databases that contain the information are acceptable as attachment.

DISCUSS:

	Total Subcontracting Dollars (per the SSR)		Small Business					
Fiscal Year	\$ Goal	\$ Actual	\$ Goal	\$ Actual	% Goal	% Actual		
	Small Disadvantaged Business				Women-Owned Small Business			
Fiscal Year	\$ Goal	\$ Actual	% Goal	% Actual	\$ Goal	\$ Actual	% Goal Actual	
	HBCU/MI				Hub-Zone Businesses			
Fiscal Year	\$ Goal	\$ Actual	% Goal	% Actual	\$ Goal	\$ Actual	% Goal Actual	
	Veteran-Owned Small Business				Service Disabled Veteran-Owned Small Business			
Fiscal Year	\$ Goal	\$ Actual	% Goal	% Actual	\$ Goal	\$ Actual	% Goal Actual	

## 2. INDIVIDUAL SUBCONTRACT REPORT (ISR) – (Not applicable to Commercial or Comprehensive Plans)

a. WERE ISR REPORTS SUBMITTED IN ACCORDANCE WITH FAR REGULATIONS AND ISR INSTRUCTIONS?

☐ YES ☐ NO. Identify deficiencies: ☒ Not applicable to Comprehensive Plans

b. WERE THE ISR REPORTS ACCURATE?

☐ YES ☐ NO. Identify deficiencies: ☒ Not applicable to Comprehensive Plansc. PERFORM ANALYSIS OF ALL ACTIVE CONTRACTS WITH SUBCONTRACTING PLANS: - (Not applicable to Comprehensive Plans) List contracts with Plans, which by analysis and contractor concurrence, indicate one or more of the plan goals **may not** be attained by end of performance.

Contract Number	Goal May Not Be Met – Check Box(es) Where goals may not be met						Demonstrated Good Faith Effort	Rationale/Recommendations/ Customer Coordination?
	SB	SDB	WOSB	HUBZ	VOSB	SDVOSB		
N/A	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> No	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> No	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> No	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> No	
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> No	
<b>Total:</b>								

See Attached, if necessary. ☐ Yes ☐ No

d. PERFORM ANALYSIS OF COMPLETED SUBCONTRACTING PLANS (FINAL SF 294) FOR THIS REVIEW PERIOD.

COMPLETED CONTRACTS	All Goals Were Met	Goals Not Met – Check Box(es)						Demonstra ted Good Faith Effort	Recommended Action
		SB	SDB	WOSB	HUBZ	VOSB	SDVOSB		
N/A	<input type="checkbox"/> YES <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> No	
	<input type="checkbox"/> YES <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> No	
<b>Total:</b>									

See Attached, if necessary. ☐ Yes ☐ No

3. FOR COMPREHENSIVE SUBCONTRACTING PLANS ONLY INITIATIVES:

a. Describe the efforts the firm uses to achieve all negotiated initiatives? Describe:

[REDACTED]

[REDACTED] Sikorsky achieved the goal in this initiative by [REDACTED]

[REDACTED]

Is the firm making adequate progress to meet all milestones for all negotiated initiatives? ☒ Yes ☐ No

b. TARGET INDUSTRIES:

Has the contractor met, or are they on track to meet all selected industry category goals? ☒ Yes ☐ No



Target Industries				
SB Concern Category	Commodity	Goal	Achievement	Remarks

Sikorsky increased its efforts to foster growth in the two selected industry categories listed above in FY14.

Sikorsky reported achievement over and above the planned increase.

Describe the method the firm uses to improve performance by small business in the selected industry categories?  
Were all goals achieved or not achieved? What is rationale?

Sikorsky achieved all FY14 Initiative goals and Target Industries. The SBLO meets with procurement groups on a quarterly basis to identify issues or potential areas for opportunities. Questions are asked pertaining to suppliers capabilities and or if new suppliers need to be sought. An example of this activity is

c. List the major programs (s) the firm is monitoring as requested by the customer.

Program Name	Discuss:	Add/Remove
N/A		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove

d. Did the firm fully comply with the request to provide program specific information as requested by the customer?  
☒ Yes ☐ No

Sikorsky does not have a requirement to provide this information.

e. PERFORM INTERIM ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN (SF 295).

Indicate by analysis and contractor concurrence, one or more of the plan's goals **may not be** attained by end of performance.

COMPREHENSIVE PLAN	Goal May Not Be Met – Check Box(es) where goals may not be met						Demonstrated Good Faith Effort
	SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	

Midyear SF295 Date Range:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
---------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	---

Recommended Action: Current fiscal year, FY15 Goals were not negotiated at the time of the FY14 review (Abnormal negotiation cycle).

f. PERFORM FINAL ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN (SF 295).

COMPREHENSIVE PLAN	All Goals Were Met	Goals Not Met – Check Box(es)						Demonstrated Good Faith Effort
		SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	
Year End SF295 Date Range:	<input type="checkbox"/> YES <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> No

Recommended Action: The Small Business goal was not achieved. Sikorsky achieved [REDACTED] with a goal of [REDACTED]. It is recommended that efforts to find additional Small Business suppliers continue.

**PART III – CONTRACTOR'S COMPREHENSIVE SMALL BUSINESS PROGRAM ADMINISTRATION**  
**PROGRAM ADMINISTRATION FACTORS**  
*Compliance with FAR requirements in this part establish the basic requirements for an acceptable rating*

**REVIEW OF SMALL BUSINESS PROGRAM (FAR 52.219-9)**

1. ARE THERE WRITTEN PROCEDURES IN PLACE REGARDING SMALL BUSINESS PROGRAM ADMINISTRATION FOR:

- a. FAR 52.219-9 (d) (1) Does the firm express goals in terms of percentage of totals planned subcontracting dollars for each small business category, in all plans? ☒ YES ☐ NO DESCRIBE HERE:

Contained in Sikorsky Aircraft Corporation's FY14 Comprehensive Subcontracting Plan (CSP) page 3 Section 6, describes how Sikorsky shows goals in terms of percentage of totals planned subcontracting dollars for each small business category and does comply with FAR 52.219-9 (d)(1). Included in the description is the basis of the current goal. The goals for FY14 were SB [REDACTED] SDB [REDACTED] WOSB [REDACTED], HUBZone [REDACTED], VOSB [REDACTED], and SDVOSB [REDACTED].

[REDACTED] DCMA finds the process and procedure described in the manual and FY14 CSP acceptable.

- b. FAR 52.219-9 (d) (2) Are there statements of total dollars planned to be subcontracted for each small business category in all plans? ☒ YES ☐ NO DESCRIBE HERE:

Sikorsky's FY14 Comprehensive Subcontracting Plan (CSP) [REDACTED] and does comply with FAR 52.219-9 (d)(1).

[REDACTED] DCMA finds the process and procedure described in the manual and FY14 CSP acceptable.

- c. FAR 52.219-9 (d) (3) Is there a description of the principal types of supplies and services to be subcontracted for each small business category? ☒ YES ☐ NO DESCRIBE HERE:



[REDACTED] DCMA has concluded that the supporting documentation does substantiate compliance with FAR 52.219-9(d)(3). DCMA finds this to be acceptable.

- d. FAR 52.219-9 (d) (4) Briefly describe and analyze the methodology used by the firm to develop subcontracting goals. Is the firm adhering to the method described in the plan to develop subcontracting goals? ☒ YES ☐ NO  
DESCRIBE HERE:

[REDACTED] and does comply with FAR 52.219-9 (d)(4). DCMA finds this to be acceptable.

- e. FAR 52.219-9 (d) (5) Briefly describe and analyze the methodology utilized by the firm to identify small business sources. Is the firm adhering to the method described in the plan to develop small business sources? ☒ YES ☐ NO  
DESCRIBE HERE:

[REDACTED]  
[REDACTED]  
[REDACTED]  
Sikorsky complies with FAR 52.219-9 (d) (5). DCMA finds this be acceptable.

- f. FAR 52.219-9 (d) (6) Briefly describe and analyze the methodology utilized by the firm to determine and allocate indirect subcontracting dollars for the SF295 (and the SF 294, if applicable). Are they adhering to the policy, and or the method described in the plan to determine indirect costs? ☒ YES ☐ NO DESCRIBE HERE:

Sikorsky is adhering to the method described in the FY14 CSP. [REDACTED]

[REDACTED] The method as stated is not the indirect subcontracting and this formula must be corrected in future Subcontracting Plans.

[REDACTED] record keeping must be corrected so that correct dollars are reported to each Executive Agency.

[REDACTED] DCMA recommends that Sikorsky amend the method that it is used to determine indirect subcontracting spend that is applied to the SSR. Additionally, assure that [REDACTED] are reported to DoD.

- g. FAR 52.219-9 (d) (7) Briefly describe and analyze the small business related duties of the individual who administers the subcontracting program/plan. Are they fulfilling the small business duties as described in the plan ?  
☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]  
 [REDACTED]  
 [REDACTED] The DCMA Program Manager finds this to be acceptable.

- h. FAR 52.219-9 (d) (8) Briefly describe and analyze the efforts by the firm to ensure equitable subcontracting opportunities exist for small businesses. Is the firm adhering to the method described in the plan to assure equitable subcontracting opportunities exist for small business? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]  
 [REDACTED] The DCMA Program Manager finds this to be acceptable.

- i. FAR 52.219-9 (d) (9) Briefly describe and analyze the methodology utilized by the firm for maintaining records of purchases over \$650,000, (\$1.5M for construction) with large businesses that require subcontracting plans.. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]  
 [REDACTED] Notes on how Sikorsky is appropriately maintaining records are recorded on the Exhibit 1 of this report. A sample of "flow-down" compliance with FAR 52.219-9 clause was requested. Evidence of the flow-down clause was demonstrated by Sikorsky providing Subcontracting Plans in support of the review. DCMA finds this acceptable.

- j. FAR 52.219-9 (d) (10) Does the firm cooperate in studies or surveys as may be required, submit periodic reports to determine extent of compliance to plans. Submit ISR, Subcontracting Report for Individual Contracts, and/or SSR, Summary Subcontract Report, in accordance with 52.219-9, and ensure that its subcontractors agree to submit ISR and SSR. ☐  
 YES ☒ NO DESCRIBE HERE

[REDACTED] However the execution of what was stated in the manual and the plan were not carried through. Compliance with this FAR element was not demonstrated. Sikorsky was unable to fully support records of ISR in eSRS as required, by ensuring that their subcontractors who received/receives a subcontract of \$650,000 or over submits ISR via eSRS for review and approval of the SBLO. Sikorsky had difficulty locating supporting contract numbers. Therefore DCMA found Sikorsky non-compliant with FAR 52.219-9 (d) (10). DCMA does not find this acceptable. It is recommended that Sikorsky maintain capability to provide supporting documentation to ensure the subcontractors with applicable Small Business Plans are submitting ISRs in accordance with FAR. This finding was also issued as a result of the FY13 review. (Reference Exhibit 1)

- k. FAR 52.219-9 (d) (11) (i) Briefly describe and analyze the Source lists (e.g. CCR), guides, and other data the firm uses to identify small businesses. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO  
 DESCRIBE HERE:

During the review the SBLO was able to demonstrate the ability to navigate www.sam.gov, Small Business Dynamic Search in addition to Sikorsky's internal data base and Supplier information forms. Sikorsky does comply with FAR 52.219-9 (d)(11)(i). DCMA finds this acceptable.

- l. FAR 52.219-9 (d) (11) (ii) List organizations that are contacted by the firm in an attempt to locate sources that are small businesses. Is the firm utilizing the list of organizations described in the plan? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

- m. FAR 52.219-9 (d) (11) (iii) Briefly describe and analyze the methodology utilized by the firm for maintaining records of purchases over \$150,000. Are they adhering to the method described in the plan? ☒ YES ☐ NO  
DESCRIBE HERE:

The DCMA Program Manager reviewed supporting documentation for compliance against this FAR element, and determined that adequate information is collected to support purchases of \$150K or greater. Sikorsky is appropriately maintaining records and complies with FAR 52.219-9 (d) (11)(iii). DCMA finds this to be acceptable.

- n. FAR 52.219-9 (d) (11) (iv) Briefly describe and analyze the records the firm maintains to document outreach efforts with trade associations business development organizations, conferences, trade fairs, and veteran service organizations, to locate small businesses. Is the firm maintaining records as described in the plan? ☒ YES ☐ NO

DESCRIBE HERE:

[REDACTED] . Sikorsky is compliant with FAR 52.219-9 (d)(11). DCMA finds this acceptable.

- o. FAR 52.219-9 (d) (11) (v) Briefly describe and analyze the records the firm maintains to document internal guidance and encouragement to buyers through (A) workshops, seminars, training, etc. and (B) monitoring performance to evaluate compliance with program requirements. Are they maintaining records as described in the plan? ☒ YES ☐ NO  
DESCRIBE HERE:

[REDACTED]

[REDACTED] DCMA considers the process contained in the CSP and SAC Handbook as compliant with FAR 52.219-9(d)(11)(v). DCMA finds this to be acceptable.

- p. FAR 52.219-9 (d) (11) (vi) Briefly describe and analyze the methodology the firm uses, on a contract-by-contract basis, to record support award data, including the name, address, and business size of each subcontractor. Contractors having commercial plans need not comply with this requirement. Are they maintaining records as described in the plan? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

[REDACTED] . It is recommended that Sikorsky add the definitions of all small business concerns so that the supplier knows that they are signing and held accountable for, and include the penalty as stated in FAR 52.219-1 to its suppliers. These changes should be a part of the update to form SA1048.

- q. FAR 52.219-9 (e) (1) Briefly describe and analyze the methodology utilized by the firm to assist small businesses by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns. Are they adhering to the method described in the plan? ☒ YES ☐ NO DESCRIBE HERE:

Source Selection Instruction PUR02-02-016 states that an evaluation preference may be used in competitive acquisitions where award is based on price or price related factors. Offers are evaluated by adding a 10% factor to the prices of all offers except offers from Small Disadvantaged Businesses and HUBZone Small Businesses. An evaluation adjustment shall be used in competitive acquisitions \$100K.



and/or over. The use of this instruction was demonstrated by Sikorsky competitively bid the purchase of power with both Large and Small Business concerns. [REDACTED]

[REDACTED] Sikorsky complies with FAR 52.219-9 (e)(1). DCMA finds this be acceptable.

- r. FAR 52.219-9 (e) (2) Briefly describe and analyze the methodology utilized by the firm to provide adequate and timely consideration of small businesses in all "make-or-buy" decisions. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO

DESCRIBE HERE:

[REDACTED] The DCMA Program Manager finds this to be acceptable.

- s. FAR 52.219-9 (e) (3) Briefly describe and analyze the methodology utilized by the firm to counsel and discuss subcontracting opportunities with small businesses. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO  
DESCRIBE HERE:

[REDACTED] The DCMA Program Manager finds this to be acceptable.

- t. FAR 52.219-9 (e) (4) Briefly describe and analyze the methodology utilized by the firm to provide notice to subcontractors concerning penalties and remedies for misrepresentations of business status as a small business for the purpose of obtaining a subcontract. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO  
DESCRIBE HERE:

Yes notice is provided. However, it is recommended that Sikorsky update their manual that addresses penalties for small business concerns misrepresenting their status. Furthermore it is recommended that Sikorsky adopt the definitions listed in FAR part 19 without reference. Contractors should see what they are signing as without having to refer to an additional site. Penalties are mentioned in the SBLO manual and the FORM SA1048 and it is stated that the penalties are similar. It is recommended that FAR clause 52.219-1 is used as Sikorsky's small business representation and or update SA1048. Furthermore Sikorsky's procedures mirror what is stated in the FAR by definition and penalty statement. Sikorsky did not demonstrate that Purchase orders include NAICS codes. However Small Business Certifications included the information but there is no cross reference. It is recommended that Sikorsky include NAICS codes on their purchase orders.

- u. FAR 19.702 It is 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 small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns. Describe the method utilized by the firm to ensure timely payment of subcontractors. Has the firm been adhering to this policy? ☒ YES ☐ NO

DESCRIBE HERE:

[REDACTED] DCMA finds this acceptable.

- v. Has the firm adequately addressed all previous Corrective Action Plans? ☐ YES ☒ NO

Follow-up, Corrective Action indicated in FY13 Review was that Sikorsky provide supporting documentation to ensure the subcontractors with applicable Small Business Plans are submitting ISRs in accordance with FAR 52.219-9 (d) (10). There was difficulty tying the purchase order to the contract. Currently, Sikorsky is working on system improvements to improve this capability [REDACTED]. (Reference Exhibit 1, subcontract number not identified and ISR's not accepted).

## 2. COMPLIANCE WITH RECORD KEEPING:

- a. REVIEW A REPRESENTATIVE SAMPLE OF PURCHASE ORDERS AWARDED TO LARGE BUSINESS, INCLUDING PURCHASE ORDERS OVER \$650,000.

See below.

## SUBCONTRACTING PURCHASE ORDER REVIEW CHECKLIST DCMA FORM 640 EXHIBIT 1

## DCMA FORM 640 EXHIBIT 1

*(for more rows click outside the right side of the row on the form and hit "enter")*

CONTRACTOR:	SIKORSKY AIRCRAFT CORPORATION	PERIOD COVERED: FY14	October 1, 2013 Thru September 30, 2014
SAMPLING OF AWARDS TO LARGE BUSINESS OVER \$150,000 AND \$650,000; AND SAMPLES OF P.O. TO SMALL BUSINESS TO VERIFY CERTIFICATION			
SUB-CONTRACTS WITH LARGE BUSINESSES = or > \$650,000		FAR 52.219-9(d)(9)	
<u>Prime Contract</u>	<u>Date</u>	<u>Vendor Name</u>	<u>\$ Amount</u>
		<u>Subcontract Number</u>	<u>SB Plan In Place?</u>
		<u>ISR Input?</u>	<u>Remarks</u>

SBLO is unable to validate a contract number tied to this purchase; SIK has no way to approve the ISR.

## PURCHASE ORDERS/SUB-CONTRACTS TO LARGE BUSINESS = OR &gt; \$150,000 FAR 52.219-9(d)(11)(iii)

<u>Size</u>	<u>P.O. #</u>	<u>Date</u>	<u>Vendor Name</u>	<u>\$ Amount</u>	<u>Item Procured</u>	<u>Reason Code</u>	<u>Remarks</u>
-------------	---------------	-------------	--------------------	------------------	----------------------	--------------------	----------------

Affiliate purchases should  
not be included in the SSR

n SIK success story

**SAMPLES OF P.O. TO SMALL BUSINESS TO VERIFY CERTIFICATION****FAR 52.219-9(e)(4i)**

<u>Size</u>	<u>P.O. #</u>	<u>Date</u>	<u>Vendor Name</u>	<u>\$ Amount</u>	<u>Item Procured</u>	<u>Sys Shows</u>	<u>Self-Certification Shows</u>
-------------	---------------	-------------	--------------------	------------------	----------------------	------------------	---------------------------------



FY 14 Cert was incomplete  
only 2 pages FY 13 cert  
was complete

REASON CODES FOR SB/SDB/WOSB/HUBZone/SDVOSB NOT SELECTED/SOLICITED: (1) SOLE SOURCE / (2) SINGLE SOURCE / (3) SOURCE  
CONTROLLED DRAWING / (4) CUSTOMER DIRECTED / (5) NO KNOWN SB SOURCE / (6) SB SOLICITED, NOT SELECTED

- b. FAR 52.219-26 IDENTIFY ANY ACTIVE CONTRACTS OVER \$500,000 THAT CONTAIN AN INCENTIVE FEE  
CLAUSE [Identify contract number(s)]? ☐ YES. If yes, identify Contract Numbers:  
N/A for Comprehensive Plans

**PART IV – SUPPLEMENTAL DATA**  
**VALIDATION OF INFORMATION IN THIS PART MAY BE USED TO JUSTIFY HIGHER RATINGS**

1. HAS A COMPANY-WIDE SB POLICY STATEMENT BEEN ISSUED BY CURRENT SENIOR MANAGEMENT AND DISSEMINATED THROUGHOUT THE COMPANY?

☒ YES. Issued By: [REDACTED] Title: [REDACTED] Date: [REDACTED]

☐ NO. COMMENTS:

[REDACTED]

On April 1, 2015 Sikorsky President Mick Maur was replaced by Bob Ludec. DCMA recognizes that the change took place in 2015, however it is recommended that the new president disseminated a formal policy letter throughout the company advertising its commitment to the Small Business program and goals.

2. SBLO APPOINTMENT/AUTHORITY PLACEMENT IN THE ORGANIZATION:

- a. HAS THE SBLO BEEN FORMALLY APPOINTED BY SENIOR LEVEL MANAGEMENT?

☒ YES.

Where are the duties and responsibilities defined?

☐ NO. COMMENTS:

- b. IS THE SBLO APPOINTED AT AN APPROPRIATE LEVEL TO EFFECTIVELY ADMINISTER THE PROGRAM?

☒ YES. DESCRIBE:

☐ NO. COMMENTS

- c. TO WHOM DOES THE SBLO REPORT? Name: [REDACTED] Title: [REDACTED]

- d. SBLO IS A: ☐ Corporate ☒ Division (if a division SBLO, describe the relationship between this division and the corporate SBLO).

- e. IS THERE AN ORGANIZATION CHART THAT DISPLAYS THE POSITION OF THE SBLO WITHIN THE ORGANIZATION?

☒ YES.

☐ NO. COMMENTS:

Several organizational changes have recently occurred since the FY 13 Small business compliance review. Mick Maurer was replaced by Bob Leduc as President of Sikorsky Aircraft. Senior Vice President of Operations, Shane Eddy was replaced by John Palumbo. Martha Crawford replaced Francisco Vasquez, as the new SBLO for Sikorsky.



## 3. MONITORING SB PROGRAM PERFORMANCE AND REQUIREMENTS:

a. ARE SENIOR MANAGEMENT AND STAFF BRIEFED REGULARLY ON ACHIEVEMENT AND/OR PROGRAM DEFICIENCIES?

☒ YES. COMMENTS:

[REDACTED]

[REDACTED]

[REDACTED]

☐ NO. COMMENTS:b. WHAT DOES CONTRACTOR DO TO IMPROVE OVERALL PROGRAM PERFORMANCE IF OVERALL PROGRAM GOALS ARE NOT BEING MET? *(Identify any Corrective Action Plan(s) implemented)*

[REDACTED]

Sikorsky achieved most of the FY14 goals.

[REDACTED]

## 4. SUPPLEMENTAL INFORMATION

- a. Discuss the firm's use of strategic sourcing teams or other groups within the firm that may assist the SBLO in the development of business subcontracting sources and the goal setting process. (If so, define its role in goal development and its role during plan performance). DESCRIBE:

[REDACTED]

[REDACTED]

- b. Discuss any successes the firm has made in subcontracting opportunities, those which were normally awarded to a large business, that have been redirected to a small business. DESCRIBE:

[REDACTED]

- c. Discuss any procurement actions the firm may have reserved for small business. DESCRIBE:

[REDACTED]

- d. Discuss the firm's use of Corporate, Blanket and Long Term Agreements and how they may affect small business dollars. DESCRIBE:

[REDACTED]

- d. Discuss the extent of use and the firm's internal written guidance for credit card purchases. DESCRIBE:

[REDACTED]

- f. Discuss the firm's use of the internet or web-site as tools to advertise its ongoing and future procurement requirements. DESCRIBE:

[REDACTED]

- g. Discuss the firm's use of Mentor/Protégé agreements to increase small business subcontracting opportunities. If the firm is not participating in the Mentor Protégé program, are they considering participating in the program? DESCRIBE:

[REDACTED]

[REDACTED]

- h. Discuss the firm's initiatives/accomplishments made to ensure more small businesses are able to compete in more "high-tech" procurements. DESCRIBE:

[REDACTED]

- i. Discuss how the firm monitors its individual subcontracting goals/plans and readjusts its internal focus in achieving goals that may be in doubt of being attained. DESCRIBE:

- j. Discuss any planned procurement actions, or procurement actions, or procurements addressed specifically within subcontracting plan that had to be redirected to another business size category. DESCRIBE:

5. NOTEWORTHY ACTIVITIES TO JUSTIFY A HIGHLY SUCCESSFUL OR OUTSTANDING RATING:

REVIEW AND DISCUSS CONTRACTOR'S ACTIVITIES THAT ARE CONSIDERED NOTEWORTHY TO JUSTIFY A HIGHLY SUCCESSFUL OR OUTSTANDING.

6. ADDITIONAL REMARKS. DESCRIBE IN DETAIL HOW A CONTRACTOR HAS MET THE CRITERIA TO JUSTIFY A RATING THAT IS HIGHER THAN ACCEPTABLE.

Outstanding – Describe how the contractor has had exceptional success with initiatives to assist, promote and utilize small business (SB), small disadvantaged business (SDB), women-owned small business (WOSB), HUBZone small business, veteran-owned small business (VOSB), and service-disabled VOSB (SD/VOSB). Describe how the contractor has an exemplary program that could be used as a model by other contractors in similar industries.

Highly Successful – Describe how the contractor has had significant success with initiatives to assist, promote, and utilize SB, SDB, WOSB, HUBZone small business, VOSB, and SD/VOSB. Describe how the contractor has gone above and beyond the required elements of the program. Provide documentation and stories to support such efforts.

**PART V – SUMMARY AND RECOMMENDATIONS**

**1. PROGRAM RATING:**

The following rating criteria should be used to determine the contractor's rating. Note that the rating criteria are the same as SBA per the November 12, 2009 DCMA/SBA Memorandum of Understanding.

☐ **Outstanding - Exceeds** the negotiated small business goal and 2 additional category goals on 90% or more of the subcontracting plans reported for the fiscal year under review. Has exceptional success with numerous specific initiatives to assist, promote and utilize Small Business (SB), Small Disadvantaged Business (SDB), Women-Owned Small Business (WOSB), HUBZone Small Business (HUBZone), Veteran-Owned Small Business (VOSB), Service-Disabled Veteran Own Small Business (SDVQSB); Alaska Native Corporations (ANC's) and Tribal Native American concerns, except in instances where the Large Prime Contractor (LPC) can provide a reason the Commercial Marketing Representative (CMR) or DCMA representative deems justifiable as to why the LPC has not had exceptional success in those categories.

☐ **Highly Successful - Met or exceeded** the negotiated goals in three small business categories on 80% of the subcontracting plans reported for the fiscal year under review. Has moderate success with some initiatives to assist, promote and utilize SB, SDB, WOSB, HUBZone, VOSB, and SDVOSB as described above in the criteria for a rating of Outstanding. Demonstrates focused efforts to go above and beyond the required elements of the subcontracting program and provides documentation of achievements and success stories to support such efforts. The contractor demonstrates existing policies and process that ensures 85% on-time and accurate submission of



required reports in eSRS as a prime contractor and 80% on-time submission of reports from their subcontractors.

☐ **Acceptable** – Always demonstrates a good-faith effort to meet **all** of its goals on subcontracting plans reported for the fiscal year being reviewed, but falls short of thresholds to receive a rating of Highly Successful. Provides reasonable and supportable explanations why certain goals could not be achieved. Demonstrates compliance with the mandatory elements of their subcontracting plans and implementing regulations. ISRs and SSRs submitted accurately within 30 days after the end of applicable reporting periods 70% of the time.

☒ **Marginal - Deficient** in meeting key subcontracting plan elements or the contractor has failed to satisfy one or more requirements of a corrective action plan from the prior review. Fail to comply with the submission requirements in eSRS on the majority of their contracts with subcontracting plans and no evidence of flow-down to applicable subcontractors. There is evidence of corporate and/or senior management commitment to bring their subcontracting program to an acceptable level and has demonstrated a commitment to apply the necessary resources to do so. A corrective action plan is required, and the Administrative Contracting Officer(s) (ACO) and SBA CMR(s) must be notified.

☐ **Unsatisfactory – Noncompliant** with the contractual requirements of DFARS and FAR 52.219-8 and 52.219-9. Contractor's management shows little interest in bringing its program to an acceptable level or is generally uncooperative. For example, recommendations made by SBA or DCMA on previous reviews have never been implemented. A corrective action plan is required, and the ACO(s) and SBA CMR(s) must be notified

## 2. RISK RATING:

The following rating criteria should be used to determine the contractor's rating.

- ☒ **High** - High Risk is assigned when the contractor is not meeting contract negotiated and DoD goals.
- ☐ **Moderate** - Moderate Risk may be assigned when the contractor is meeting contract negotiated goals but not DoD goals.
- ☐ **Low** – Low Risk may be assigned when the contractor is meeting contract negotiated and DoD goals.

## 3. RATINGS SUMMARY, RECOMMENDATIONS, AND FOLLOW-UP OF CORRECTIVE ACTIONS(S):

- 1 "Negotiated goals" refers to the dollar and percentage goals in the approved subcontracting plan. (For rating purposes, the reviewer will compare the percentage goals to the percentage achievements.)
- 2 Examples of such initiatives include, but are not limited to, participating in a Mentor-Protégé program, performing compliance reviews at subcontractors' sites, administering a buyer incentive program, participating in trade fairs, promoting registration in the CCR, and contracting suppliers to encourage SDB and HUBZone certification.
- 3 For example, recommendations made by SBA or DCMA on previous reviews have never been implemented.

### DISCUSS:

Risk Rating:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Accuracy of the SSR-[REDACTED] DCMA was unable to determine if the internal purchases were included in the FY14 SSR. It is recommended that Sikorsky provide assurances that internal purchases are not included in the SSR's.

- [REDACTED]. It is recommended that the SSR reported to DoD include only dollars attributed to DoD.
- When the SSR was completed, the information was not preserved at the time of submission. As a result, transactions made after that date had an impact on the purchase orders that are a part of the FY14 SSR. Sikorsky was unable to go reproduce a report that displays the dollar amounts reported on the FY14 SSR. It is Recommend that Sikorsky take a snapshot of the Purchase order file the moment that the SSR is completed, so that the SSR can be duplicated.
- [REDACTED] It is recommended that Sikorsky attribute a DoD prime/subcontract contract number for all dollars counted toward DoD performance goals.
- Allocation Rate versus Indirect Subcontracting- Sikorsky is adhering to the method described in the FY14 CSP. The Allocation rate stated in the SBLO procedural manual differs from the FY14 CSP. [REDACTED]  
[REDACTED]  
[REDACTED] The method as stated is not the indirect subcontracting and this formula must be corrected in future Subcontracting Plans.
- [REDACTED] It is recommended that the non DoD spend be removed from the DoD allocation rate. [REDACTED]  
[REDACTED] After review, it was determined that Sikorsky did not follow the instructions provided in their manual. It is recommended that the correct application of the indirect rate be applied to the dollars reported on the SSR or elect not to include indirect subcontracting in your subcontracting plan  
[REDACTED] record keeping must be corrected so that correct dollars are reported to each Executive Agency.  
[REDACTED] DCMA recommends that Sikorsky amend the method that it is used to determine indirect subcontracting spend that is applied to the SSR. Additionally, assure that only DoD dollars are reported to DoD.
- ISR Submission for Subcontractors- [REDACTED]  
[REDACTED] However the execution of what was stated in the manual and the plan were not carried through. Compliance with this FAR element was not demonstrated. Sikorsky was unable to fully support records of ISR in eSRS as required, by ensuring that their subcontractors who received/receives a subcontract of \$650,000 or over submits ISR via eSRS for review and approval of the SBLO. Sikorsky had difficulty locating supporting contract numbers. Therefore DCMA found Sikorsky non-compliant with FAR 52.219-9 (d) (10). DCMA does not find this acceptable. It is recommended that Sikorsky maintain capability to provide supporting documentation to ensure the subcontractors with applicable Small Business Plans are submitting ISRs in accordance with FAR. This finding was also issued as a result of the FY13 review. (Reference Exhibit 1)
- Subcontractor Size- [REDACTED]  
[REDACTED] It is recommended that Sikorsky add the definitions of all small business concerns so that the supplier knows that they are signing and held accountable for, and include the penalty as stated in FAR 52.219-1 to its suppliers. These changes should be a part of the update to form SA1048.
- A Penalty for Misrepresentation-It is recommended that Sikorsky update their manual that addresses penalties for small business concerns misrepresenting their status. Furthermore it is recommended that Sikorsky adopt the definitions listed in FAR part 19 without reference. Contractors should see what they are signing as without having to refer to an additional site. [REDACTED]. It is recommended that FAR clause 52.219-1 is used as Sikorsky's small business representation and or update SA1048. Furthermore Sikorsky's procedures mirror what is stated in the FAR by definition and penalty statement. Sikorsky did not demonstrate that Purchase orders include NAICS codes. However Small Business Certifications included the information but there is no cross reference. It is recommended that Sikorsky include NAICS codes on their purchase orders

- Follow-up on previously issued Corrective Actions- Follow-up, Corrective Action indicated in FY13 Review was that Sikorsky provide supporting documentation to ensure the subcontractors with applicable Small Business Plans are submitting ISRs in accordance with FAR 52.219-9 (d) (10). There was difficulty tying the purchase order to the contract. Currently, Sikorsky is working on system improvements to improve this capability [REDACTED]. (Reference Exhibit 1, subcontract number not identified and ISR's not accepted). Please address this in the FY14 Corrective Action Plan.

**4. EXIT INTERVIEW PARTICIPANTS:****Government:**

1. Micole Stephens-Mack
- 2.
- 3.

**Contractor:**

1. Martha Crawford
2. Keith Richardson
- 3.

**5. REVIEW STATUS:**

Indicate the status of this 640 Review. Once a review is closed, you'll need to create a new review.

☒ Open

☐ Closed

**6. NAME of SMALL BUSINESS SPECIALIST:**

STEPHENS.MICOLE.123043061

SIGNATURE: 2

**7. DATE:**

Digitally signed by STEPHENS.MICOLE.1230430612  
 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=DCMA,  
 cn=STEPHENS.MICOLE.1230430612  
 Date: 2015.07.07 16:22:58 -05'00'



**DEFENSE CONTRACT MANAGEMENT AGENCY (DCMA)**  
**SMALL BUSINESS SUBCONTRACTING PROGRAM COMPLIANCE REVIEW**  
 In accordance with FAR 19.706, FAR 52.219-8, and FAR 52.219-9

**Part I – General Information**

**1.a. Contractor****Name:** Sikorsky, A Lockheed Martin Company(SIK)**Address:** 6900 Main Street**City/State/Zip:** Stratford, CT 06615-9129**CAGE(s) [Field 1]:** 78286**DUNS [Field 1]:** 835551474**1.b. Small Business Liaison Officer (SBLO) [Field 2]:****Name:** Martha Crawford**Phone:** (b) (6) Ext**E-mail:** (b) (6)**1.c. Alternate Small Business Liaison Officer (SBLO) [Field 3]:****Name:** NA**Phone:** Ext**E-mail:****2. DCMA Small Business Professional****Name:** Luz M. Vasquez**Location:** Small Business Professional- DCMA DALLAS**Phone:** (b) (6) Ext**E-mail:** (b) (6)**3. Administrative Contracting Officer****Name:** Kimberly Gaskins**Location:** DCMA Sikorsky**Phone:** (b) (6) Ext**E-mail:** (b) (6)**4. Small Business Administration (SBA) Representative****Name:** Sandy Liu**Phone:** (b) (6) Ext**E-mail:****5. DCMA/Small Business Administration (SBA) Joint Review**☐ Yes ☒ No NOTE: Always "No" unless it is an approved follow up type review.**6. Review Type:** On-site ☒ Virtual Review ☐**7. Period Covered by this Review****a. From:** October 1, 2016**b. To:** September 30, 2017**8.a. Date of this review:** March 6-7, 2018**b. Rating of this review:** Very Good**9.a. Date of last review [Field 4]:** February 22, 2017**b. Rating of last review [Field 5]:** Satisfactory

**10. Department of Defense (DoD) Ratios** 84%**a. Total annual company sales [Field 6]:** 3,913,721,983**b. Total annual sales for DoD [Field 7]:** 3,320,089,864**11. Type of Subcontract Plan(s)**☐ **Individual Plan(s): Number of plans:**☐ **Commercial Plan: Approved by:****Plan year:**☒ **Comprehensive Plan: Approved by:** Tatia M. Evelyn-Bellamy**Plan year:** FY17☐ **Master Plan: Approved by:****Three (3) Year Period Ending:****12. Mentor Protégé Agreements [Field 8]:**

None for FY17

## Part II – Contractor's Subcontracting Performance

### 1. Accuracy of Small Business Reports (Summary Subcontract Reports (SSRs) and Individual Subcontracting Reports (ISRs))

- a. FAR 52.219-8(a). Were small business, small disadvantaged business, women-owned small business, HUBZone small business, service-disabled veteran-owned small business, and veteran-owned small business reported on SSRs and ISRs?

[Field 36] ☒ YES ☐ NO Exhibit I DESCRIBE:

The sample of purchase orders reviewed shows no errors with the suppliers size classification as such the accuracy of Sikorsky small business suppliers size claimed in their FY17 SSR is not questioned. The contractor is in compliance with FAR 52.219-8(a).

- b. FAR 52.219-8(d)(1) and FAR 52.219-9(c)(2)(i). Does the Contractor correctly rely on written representations by their subcontractors regarding their status as a small business concern, a veteran-owned small business concern, a service-disabled veteran-owned small business concern, a small disadvantaged business concern, or a women-owned small business concern to include certifications that representations are current, accurate, and complete as of the date of the offer for the subcontract? [Field 36] ☒ YES ☐ NO ☐ N/A Exhibit I DESCRIBE:

The sample of purchase orders selected for this review and documented under Exhibit 1 shows no errors with the suppliers size classification. This is a great improvement from their FY16 review. The contractor implemented a strong validation process with excellent results.

- c. FAR 52.219-8(d)(2) and FAR 52.219-9(c)(2)(ii). If the Contractor relies on a subcontractor's representations of its size and socioeconomic status as a small business, small disadvantaged business, veteran-owned small business, service-disabled veteran-owned small business, or a women-owned small business in the System for Award Management (SAM)\*, has the subcontractor represented that the size and socioeconomic status representations made in SAM are current, accurate and complete as of the date of the offer for the subcontract? [Field 36] ☐ YES ☒ NO ☐ N/A Exhibit I

\*NOTE: The Contractor may not require the use of SAM for the purposes of representing size or socioeconomic status in connection with a subcontract.

- d. FAR 52.219-9(l). Are purchases from a corporation, company, or subdivision that is an affiliate appropriately NOT included in the ISR and SSR. ☒ YES ☐ NO
- e. FAR 52.219-9(l). Do ISRs and SSRs only include subcontracts involving performance in the United States or its outlying areas? ☒ YES ☐ NO
- f. FAR 52.219-9(l). Do ISRs and SSRs include awards by affiliates as subcontract awards by the Contractor? ☒ YES ☐ NO
- g. FAR 52.219-9(l). Are subcontracting achievements as reported on ISRs and SSRs limited to awards made to Contractors' immediate next-tier subcontractors? ☒ YES ☐ NO

**2. Overall subcontracting performance – SSR submission FAR 52.219-9(l)(2)**

- a. Were SSRs submitted accurately in accordance with all the elements of FAR 52.219-9(l) and SSR instructions at Electronic Subcontracting Reporting System (eSRS.gov)? [Field 9] ☒ YES ☐ NO DESCRIBE:**

Sikorsky submitted their SSR reports timely in accordance with the FAR and eSRS instructions; however, as noted in their FY16 report, Sikorsky is not able to validate the SSR report because they cannot tie the material purchased prior to an award to a DoD contract award (Direct or Indirect material) [REDACTED]

- (1) Were SSRs submitted under individual subcontracting plans ☐ YES ☒ NO**  
If no, skip to question (2)

- (a) FAR 52.219-9(l)(2)(i)(A). Does the SSR encompass all subcontracting under prime contracts and subcontracts with the awarding agency, regardless of the dollar value of the subcontracts and does the SSR includes indirect costs on a prorated basis? [Field 9] [Field 10]**  
☐ YES ☐ NO
- (b) FAR 52.219-9(l)(2)(i)(C). Did the Contractor submit a separate SSR to each executive agency covering only that agency's contracts, provided at least one of that agency's contracts is over \$700,000 (over \$1.5 million for construction of a public facility) and contains a subcontracting plan? ☐ YES ☐ NO**
- (c) 52.219-9(l)(2)(i)(D). Is the SSR submitted annually, within thirty days (30) after the end of the Government's fiscal year [September 30]? ☐ YES ☐ NO**
- (d) FAR 52.219-9(l)(2)(i)(E). Were subcontract awards that were related to work for more than one executive agency appropriately allocated on the SSR? ☐ YES ☐ NO ☐ N/A**

- (2) Commercial Plan ☐ YES ☒ NO** If no, skip to question 3.

- (a) FAR 52.219-9(l)(2)(ii)(A). Does the commercial SSR include all subcontract awards under the commercial plan in effect during the Government's fiscal year and all indirect costs? ☐ YES ☐ NO [Field 9] [Field 10]**
- (b) 52.219-9(l)(2)(ii)(B). Is the commercial SSR submitted annually, within thirty days (30) after the end of the Government's fiscal year? ☐ YES ☐ NO**
- (c) FAR 52.219-9(l)(2)(ii)(C). Has the Contractor specified the percentage of dollars attributable to each agency from which contracts for commercial items were received on the SSR? ☐ YES ☐ NO**

- (3) Is the CEO (or most senior executive in the organization) named on SSR [block 13 of SSR]? ☒ YES ☐ NO**

- (4) Did the CEO (or most senior executive in the organization) sign and keep the signed SSR on file? ☒ YES ☐ NO**



- b. Perform trend analysis of historical small business goal achievements (*last 5 years, if available*) from eSRS. Describe the underlying cause of trends, positive or negative. Exhibit II. DESCRIBE:



3. FAR 52.219-9(I)(1). ISR performance (not applicable to Commercial or Comprehensive Plans)

- a. Were ISRs submitted accurately in accordance with all the elements of FAR 52.219-9(I) and ISR instructions at eSRS.gov? [Field 11] ☐ YES ☐ NO DESCRIBE:

NA

- (1) FAR 52.219-9(I)(1)(i). During contract performance, were ISRs submitted within thirty days of March 31 and September 30? ☐ YES ☐ NO Exhibit III

NA

- (2) FAR 52.219-9(I)(1)(i). Were final ISRs submitted for each contract within thirty days of contract completion? ☐ YES ☐ NO

NA

- (3) FAR 52.219-9(I)(1)(ii). If options were included on the requirement, was the dollar goal inserted on the ISR a sum of the base period through the current option? ☐ YES ☐ NO

NA

- (4) FAR 52.219-9(I)(1)(iii). Did the Contractor acknowledge receipt or reject the ISRs from the subcontractor(s)? ☐ YES ☐ NO ☐ N/A Exhibit I

- b. FAR 19.701 and FAR 19.705-7(d). Perform analysis of all regular and final ISRs. Has the Contractor demonstrated a good faith effort in meeting the negotiated small business subcontracting goals? ☐ YES ☐ NO Exhibit III

NA

- b. Perform trend analysis of historical small business goal achievements (*last 5 years, if available*) from eSRS. Describe the underlying cause of trends, positive or negative. Exhibit II. DESCRIBE:

3. FAR 52.219-9(l)(1). ISR performance (not applicable to Commercial or Comprehensive Plans)

- a. Were ISRs submitted accurately in accordance with all the elements of FAR 52.219-9(l) and ISR instructions at eSRS.gov? [Field 11] ☐ YES ☐ NO DESCRIBE:

NA

- (1) FAR 52.219-9(l)(1)(i). During contract performance, were ISRs submitted within thirty days of March 31 and September 30? ☐ YES ☐ NO Exhibit III

NA

- (2) FAR 52.219-9(l)(1)(i). Were final ISRs submitted for each contract within thirty days of contract completion? ☐ YES ☐ NO

NA

- (3) FAR 52.219-9(l)(1)(ii). If options were included on the requirement, was the dollar goal inserted on the ISR a sum of the base period through the current option? ☐ YES ☐ NO

NA

- (4) FAR 52.219-9(l)(1)(iii). Did the Contractor acknowledge receipt or reject the ISRs from the subcontractor(s)? ☐ YES ☐ NO ☐ N/A Exhibit I

- b. FAR 19.701 and FAR 19.705-7(d). Perform analysis of all regular and final ISRs. Has the Contractor demonstrated a good faith effort in meeting the negotiated small business subcontracting goals? ☐ YES ☐ NO Exhibit III

NA

### Part III – Contractor's Small Business Program

#### 1. Review of Small Business Program in accordance with FAR 52.219-9 [Field 13]

a. FAR 52.219-9(d)(1). Does the Contractor express goals in terms of percentage of total planned subcontracting dollars for each small business category, in all plans?

☒ YES ☐ NO

b. FAR 52.219-9(d)(2). Are there statements of total dollars planned to be subcontracted for each small business category in all plans? ☒ YES ☐ NO

c. FAR 52.219-9(d)(3). Is there a description of the principal types of supplies and services to be subcontracted for each small business category? ☒ YES ☐ NO

d. FAR 52.219-9(d)(4). Briefly describe the methodology used by the Contractor to develop subcontracting goals. Is the Contractor adhering to the method described in the plans to develop subcontracting goals? ☒ YES ☐ NO DESCRIBE:

[REDACTED] This methodology has been found to be in compliance with FAR 52.219-9(d)(4).

e. FAR 52.219-9(d)(5). Briefly describe the methodology utilized by the Contractor to identify potential sources for solicitation purposes. Is the Contractor adhering to the method described in the approved small business subcontracting plans? ☒ YES ☐ NO DESCRIBE:

[REDACTED] . Sikorsky is found to be in compliance with FAR 52.219-9(d)(5).

## f. FAR 52.219-9(d)(6). Are indirect costs included in establishing subcontracting goals?

☐ YES ☒ NO

If indirect costs are included, briefly describe and analyze the methodology utilized by the Contractor to determine share of indirect costs for small business, veteran-owned small business concerns, service-disabled veteran-owned small business concerns, HUBZone small business concerns, small disadvantaged business concerns, and women-owned small business concerns. Is the Contractor adhering to the method described in the small business subcontracting plan? ☐ YES ☒ NO DESCRIBE:

[REDACTED]

[REDACTED]. As part of their FY16 640 review, the contractor was requested to develop a methodology to track their direct and indirect material parts spend purchased prior to award to the end-customer [REDACTED] however, DCMA won't be able to validate the accuracy of the upgraded system until after the Fiscal Year 2018 ends.

## g. FAR 52.219-9(d)(7). Is the name of individual employed by the Contractor who administers the subcontracting program included in the plans, with a description of the duties?

☒ YES ☐ NO Is the named person fulfilling the small business duties as described in the plans? ☒ YES ☐ NO DESCRIBE:

Martha Crawford is correctly identified on the FY17 CSP as Sikorsky's SBLO along with a description of her duties. [REDACTED]

[REDACTED] During the previous 640 review, it was recommended that Sikorsky implement stronger measures to ensure the ISR collection and review process was not broken. Based on the recommendations, Sikorsky [REDACTED]

[REDACTED] This review validates the implementation of the ISR tool. The purchase order sampled showed 40% of the subcontractors ISRs were submitted late. As a result, it is recommended that Sikorsky enhance their communication exchanges with their subcontractors to inform them of the importance of a timely ISR submission in accordance with the instructions of the eSRS.

h. FAR 52.219-9(d)(8). Briefly describe the efforts by the Contractor to ensure small business concerns have an equitable opportunity to compete for subcontracts. Is the Contractor adhering to the method described in the plans to assure equitable subcontracting opportunities exist for small business? ☒ YES ☐ NO DESCRIBE:

A review of Sikorsky's procedures PUR 02-02-004 titled Sikorsky's Small Business programs details the duties of the SBLO and Buyers to ensure small business concerns have equitable opportunities to compete for subcontracts. [REDACTED]

[REDACTED]

## i. FAR 52.219-9(d)(9).

(1) Is the Contractor adhering to the assurance that the Contractor will include clause FAR 52.219-8 "Utilization of Small Business Concerns" in all subcontracts that offer further subcontracting opportunities? ☒ YES ☐ NO Exhibit I



f. FAR 52.219-9(d)(6). Are indirect costs included in establishing subcontracting goals?

☐ YES ☒ NO

If indirect costs are included, briefly describe and analyze the methodology utilized by the Contractor to determine share of indirect costs for small business, veteran-owned small business concerns, service-disabled veteran-owned small business concerns, HUBZone small business concerns, small disadvantaged business concerns, and women-owned small business concerns. Is the Contractor adhering to the method described in the small business subcontracting plan? ☐ YES ☒ NO DESCRIBE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] As part of their FY16 640 review, the contractor was requested to develop a methodology to track their direct and indirect material parts spend purchased prior to award to the end-customer. [REDACTED] however, DCMA won't be able to validate the accuracy of the upgraded system until after the Fiscal Year 2018 ends.

g. FAR 52.219-9(d)(7). Is the name of individual employed by the Contractor who administers the subcontracting program included in the plans, with a description of the duties?

☒ YES ☐ NO Is the named person fulfilling the small business duties as described in the plans? ☒ YES ☐ NO DESCRIBE:

Martha Crawford is correctly identified on the FY17 CSP as Sikorsky's SBLO along with a description of her duties. [REDACTED]

[REDACTED] During the previous 640 review, it was recommended that Sikorsky implement stronger measures to ensure the ISR collection and review process was not broken. Based on the recommendations, Sikorsky [REDACTED]

[REDACTED] This review validates the implementation of the ISR tool. The purchase order sampled showed 40% of the subcontractors ISRs were submitted late. As a result, it is recommended that Sikorsky enhance their communication exchanges with their subcontractors to inform them of the importance of a timely ISR submission in accordance with the instructions of the eSRS.

h. FAR 52.219-9(d)(8). Briefly describe the efforts by the Contractor to ensure small business concerns have an equitable opportunity to compete for subcontracts. Is the Contractor adhering to the method described in the plans to assure equitable subcontracting opportunities exist for small business? ☒ YES ☐ NO DESCRIBE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] The SBP's review of purchase orders validates this process is being followed and proper documentation was found in the Purchase Order file. [REDACTED]

[REDACTED]

[REDACTED] Sikorsky is in compliance with FAR 52.219-9 (d)(8).

i. FAR 52.219-9(d)(9).

(1) Is the Contractor adhering to the assurance that the Contractor will include clause FAR 52.219-8 "Utilization of Small Business Concerns" in all subcontracts that offer further subcontracting opportunities? ☒ YES ☐ NO Exhibit I



- (2) Is the Contractor requiring all subcontractors that receive subcontracts over \$700,000 (\$1.5 million for construction of any public facility with further subcontracting possibilities) except small business concerns to adopt a subcontracting plan? [Field 35] ☒ YES ☐ NO ☐ N/A Exhibit I

j. FAR 52.219-9(d)(10)

- (1) 52.219-9(d)(10)(i). Does the Contractor cooperate in studies or surveys as may be required? ☒ YES ☐ NO
- (2) FAR 52.219-9(d)(10)(ii). Does the Contractor submit periodic reports to determine extent of compliance to plans? ☒ YES ☐ NO
- (3) FAR 52.219-9(d)(10)(iii). Does the Contractor include subcontracting data for each order when reporting subcontracting achievements for indefinite-delivery, indefinite-quantity contracts intended for use by multiple agencies?  
☐ YES ☒ NO
- (4) FAR 52.219-9(d)(10)(iv). Does the Contractor submit ISRs and/or SSRs?  
☒ YES ☐ NO
- (5) FAR 52.219-9(d)(10)(v). Does the Contractor ensure that its subcontractors submit ISRs and/or SSRs? ☒ YES ☐ NO ☐ N/A Exhibit I
- (6) FAR 52.219-9(d)(10)(vi). Does the Contractor provide its prime contract number, its DUNS number, and the e-mail address of the Contractor's official responsible for acknowledging receipt of or rejecting the ISRs, to all first-tier subcontractors with subcontracting plans so they can enter this information into the eSRS when submitting their ISRs? ☒ YES ☐ NO ☐ N/A
- (7) 52.219-9(d)(10)(vii). Does the Contractor require that each subcontractor with a subcontracting plan provide the prime contract number, its own DUNS number, and the e-mail address of the subcontractors official responsible for acknowledging receipt of or rejecting the SSRs, to its subcontractors with subcontracting plans? ☒ YES ☐ NO ☐ N/A

k. FAR 52.219-9(d)(11). A description of the types of records that will maintained concerning procedures that have been adopted to comply with the requirements and goals in the plans including:

- (1) FAR 52.219-9(d)(11)(i). Is the Contractor maintaining source lists (e.g. SAM), guides, and other data to identify small businesses? [Field 14] ☒ YES ☐ NO  
DESCRIBE:

[REDACTED]

Sikorsky is in compliance with FAR 52.219-9 (d)(11).

- (2) FAR 52.219-9(d)(11)(ii). Is the Contractor maintaining records of organizations that were contacted by the Contractor in an attempt to locate sources that are small businesses? [Field 15] ☒ YES ☐ NO DESCRIBE:

[REDACTED] . Other records were available as needed. A review of the records validate multiple organizations were sought in attempting to locate new small business suppliers. Sikorsky is found to be in compliance with this FAR requirement.

- (3) 52.219-9(d)(11)(iii). Is the Contractor maintaining records for each subcontract of more than \$150,000? [Field 18] ☒ YES ☐ NO ☐ N/A Exhibit I DESCRIBE:

[REDACTED] The SBP's review of purchase orders validates this process is being followed and proper documentation was found in the Purchase Order file. Sikorsky is in compliance with subject requirement.

- (4) FAR 52.219-9(d)(11)(iv). Is the Contractor maintaining records of any outreach efforts to contact trade associations, business development organizations, conferences and trade fairs and veteran service organizations? [Field 19] ☒ YES ☐ NO DESCRIBE:

[REDACTED] Sikorsky is compliant with FAR 52.219-9(d)(11)(iv).

- (5) FAR 52.219-9(d)(11)(v). Is the Contractor maintaining records of internal guidance and encouragement to buyers through (A) workshops, seminars, training, etc. and (B) monitoring performance to evaluate compliance with program requirements? [Field 20] ☒ YES ☐ NO DESCRIBE:

Sikorsky provided records of small business program updates provided to all levels of the organization in FY17 [REDACTED]

[REDACTED] Sikorsky is compliant with FAR 52.219-9(d)(11)(v).

(6) FAR 52.219-9(d)(11)(vi). Is the Contractor maintaining records on a contract-by-contract basis, records to support award data submitted by the Contractor to the Government, including the name, address, and business size of each subcontractor. Contractors having commercial plans need not comply with this requirement. [Field 21] ☒ YES ☐ NO ☐ N/A to Commercial Plans DESCRIBE:

Sikorsky maintains records in accordance with internal guidance provided in both Sikorsky's FY17 CSP and the SBLO Handbook. [REDACTED]

[REDACTED] Sikorsky is compliant with the subject FAR element.

- l. FAR 52.219-9(d)(12). Did the Contractor make a good faith effort to acquire articles, equipment, supplies, services, or materials, or obtain the performance of construction work from the small business concerns that it used in preparing the bid or proposal, in the same or greater scope, amount, and quality used in preparing and submitting the bid or proposal? ☐ YES ☐ NO ☒ N/A
- m. FAR 52.219-9(d)(13). Did the Contractor provide the Contracting Officer with a written explanation if the Contractor fails to acquire articles, equipment, supplies, services or materials or obtain the performance of construction work as described in FAR 52.219-9(d)(12)? [Field 13] ☐ YES ☐ NO ☒ N/A
- n. FAR 52.219-9(d)(14). Has the Contractor prohibited a subcontractor from discussing with the Contracting Officer any material matter pertaining to payment to or utilization of a subcontractor? [Field 13] ☐ YES ☒ NO ☐ N/A
- o. FAR 52.219-9(d)(15). Does the Contractor pay its small business subcontractors on time and in accordance with the terms and conditions of the underlying subcontract, and notify the Contracting Officer when the prime Contractor makes either a reduced or an untimely payment to a small business subcontractor? [Field 13] ☒ YES ☐ NO
- p. FAR 52.219-9(e)(1). Is the Contractor assisting small businesses by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules to facilitate the participation by such concerns? ☒ YES ☐ NO DESCRIBE:

During the review, Sikorsky's team briefed on several instances in which assistance was provided to a supplier directly or indirectly. [REDACTED]

[REDACTED]  
52.219-9(e)(1).

[REDACTED] Sikorsky's efforts are in accordance with FAR

- q. FAR 52.219-9(e)(2). Is the Contractor providing adequate and timely consideration of small businesses in all "make-or-buy" decisions? ☒ YES ☐ NO DESCRIBE:

[REDACTED]

- r. FAR 52.219-9(e)(3). Is the Contractor counseling and discussing subcontracting opportunities with small businesses? ☒ YES ☐ NO DESCRIBE:

[REDACTED]

- s. FAR 52.219-8(d)(5). Is the Contractor confirming a HUBZone small business concern is a certified HUBZone small business by SBA? ☒ YES ☐ NO Exhibit I

- t. FAR 52.219-9(e)(5). Is the Contractor providing notice to subcontractors concerning penalties and remedies for misrepresentations of business status as a small business for the purpose of obtaining a subcontract? [Field 22] ☒ YES ☐ NO DESCRIBE:

[REDACTED]

Sikorsky's practice of providing notice to subcontractors for misrepresentation is compliant with FAR 52.219-9(e)(5).

- u. FAR 52.219-9(e)(6). Is the Contractor providing notice to inform each unsuccessful small business offeror in writing of the name and location of the apparent successful offeror prior to award of the contract in which a small business concern received a small business preference for subcontracts over the Simplified Acquisition Threshold? ☐ YES ☐ NO ☒ N/A
- v. FAR 52.219-9(e)(7). Has each subcontract been assigned a NAICS code and corresponding size standard that best describes the principal purpose of the subcontract? [Field 36] ☒ YES ☐ NO

## 2. Other Regulatory Compliance

- a. FAR 52.219-8(b). Has the Contractor provided the maximum practicable opportunity to participate in performing contracts let by any Federal agency, including contracts and subcontracts for subsystems, assemblies, components, and related services for major systems for small business concerns, veteran-owned small business concerns, service-disabled veteran-owned small business concerns, HUBZone small business concerns, small disadvantaged business concerns, and women-owned small business concerns? [Field 39] ☒ YES ☐ NO DESCRIBE:

This review covers only DoD contracts, no factors were discovered that could hinder maximum practicable opportunities offered to small businesses and its subcategories.



- r. FAR 52.219-9(e)(3). Is the Contractor counseling and discussing subcontracting opportunities with small businesses? ☒ YES ☐ NO DESCRIBE:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
Sikorsky is in compliance with FAR 52.219-9(e)(3).

- s. FAR 52.219-8(d)(5). Is the Contractor confirming a HUBZone small business concern is a certified HUBZone small business by SBA? ☒ YES ☐ NO Exhibit I

- t. FAR 52.219-9(e)(5). Is the Contractor providing notice to subcontractors concerning penalties and remedies for misrepresentations of business status as a small business for the purpose of obtaining a subcontract? [Field 22] ☒ YES ☐ NO DESCRIBE:

[REDACTED]  
[REDACTED]  
Sikorsky's practice of providing notice to subcontractors for misrepresentation is compliant with FAR 52.219-9(e)(5).

- u. FAR 52.219-9(e)(6). Is the Contractor providing notice to inform each unsuccessful small business offeror in writing of the name and location of the apparent successful offeror prior to award of the contract in which a small business concern received a small business preference for subcontracts over the Simplified Acquisition Threshold? ☐ YES ☐ NO ☒ N/A
- v. FAR 52.219-9(e)(7). Has each subcontract been assigned a NAICS code and corresponding size standard that best describes the principal purpose of the subcontract? [Field 36] ☒ YES ☐ NO

## 2. Other Regulatory Compliance

- a. FAR 52.219-8(b). Has the Contractor provided the maximum practicable opportunity to participate in performing contracts let by any Federal agency, including contracts and subcontracts for subsystems, assemblies, components, and related services for major systems for small business concerns, veteran-owned small business concerns, service-disabled veteran-owned small business concerns, HUBZone small business concerns, small disadvantaged business concerns, and women-owned small business concerns? [Field 39] ☒ YES ☐ NO DESCRIBE:

This review covers only DoD contracts, no factors were discovered that could hinder maximum practicable opportunities offered to small businesses and its subcategories.



- b. FAR 52.219-8(b). Has the Contractor established procedures to ensure the timely payment of amounts due pursuant to the terms of their subcontracts with small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns? [Field 32] ☒ YES ☐ NO

Is the contractor ensuring timely payment of subcontractors? [Field 32] ☒ YES ☐ NO  
 DESCRIBE:

The SBP's is not aware of any formal or informal complaint from Sikorsky's small business suppliers as it relates to not being paid on time. [REDACTED]

Sikorsky is compliant with FAR 52.219-8(b).

- c. FAR 52.232-40. Providing Accelerated Payments to Small Business Subcontractors. If this clause is included in their prime contract(s) is the Contractor making the required accelerated payments to their small business subcontractor(s), as prescribed? [Field 23]

☐ YES ☐ NO ☒ N/A

- d. Has the Contractor adequately addressed all previous Corrective Action Plans (CAPs)? [Field 24] ☐ YES ☐ NO ☒ N/A

If applicable, describe the previous findings/deficiencies and the corrective actions implemented.

NA

### 3. Additional Program Administration

- a. Has a company-wide small business policy statement been issued by current senior management and disseminated throughout the company? [Field 25] ☒ YES ☐ NO

Issued By: [REDACTED]

Title: [REDACTED]

Date: [REDACTED]

- b. SBLO appointment/authority placement in the organization:

(1) Has the SBLO been formally appointed by senior level management to effectively administer the program? [Field 26] ☒ YES ☐ NO

(2) SBLO is a: ☐ Corporate ☒ Division (if a division SBLO, describe the relationship between this division and the corporate SBLO). DESCRIBE:

[REDACTED]

(3) Is there an organization chart that displays the position of the SBLO within the organization? [Field 27] ☒ YES ☐ NO

**c. Monitoring small business program performance and requirements:**

**(1) Are senior management and staff briefed regularly on achievement and/or program deficiencies? [Field 28] ☒ YES ☐ NO**

[REDACTED] Copies of the presentations to [REDACTED] were shared with the DCMA SBP. [REDACTED]

**(2) What does the Contractor do to improve subcontracting performance if goals are not being met? [Field 29]**

[REDACTED]

**d. Small Business Subcontracting Procedures**

**(1) Does the Contractor have company policies or procedures in place for the small business subcontracting program? [Field 30] ☒ YES ☐ NO DESCRIBE:**

[REDACTED] A copy of the [REDACTED] was provided and reviewed by the DCMA SBP.

**(2) Do the policies or procedures promote participation of small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns? ☒ YES ☐ NO ☐ N/A DESCRIBE:**

The DCMA SBP review of the procedures make no exception on promoting participation of small business concerns.

**Part IV – Comprehensive Subcontracting Plan (CSP) Test  
Program Applies to CSP Only - If not applicable skip to Part V**

**1. Describe the efforts the firm uses to achieve all negotiated initiatives.**

[REDACTED]

This initiative was on track through third quarter of FY17 when Sikorsky's [REDACTED] as such this initiative was not met. Because of the late notice to cancel this [REDACTED]

**Is the firm making adequate progress to meet all milestones for all negotiated initiatives?**

☐ YES ☒ NO

**2. TARGET INDUSTRIES**

**Has the contractor met, or are they on track to meet all selected industry category goals?**

☒ YES ☐ NO

**Describe the method the firm uses to improve performance by small business in the selected industry categories.**

[REDACTED]

**3. List the major programs(s) the firm is monitoring as requested by the customer.**

Program Name	Discuss:	Add/Remove	
NA		<input type="checkbox"/> Add	<input type="checkbox"/> Remove
		<input type="checkbox"/> Add	<input type="checkbox"/> Remove
		<input type="checkbox"/> Add	<input type="checkbox"/> Remove
		<input type="checkbox"/> Add	<input type="checkbox"/> Remove

**4. Did the firm fully comply with the request to provide program specific information as requested by the customer?** ☒ YES ☐ NO

**5. PERFORM INTERIM ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN**

Indicate by analysis and contractor concurrence, one or more of the plan's goals may not be attained by end of performance.

**Part IV – Comprehensive Subcontracting Plan (CSP) Test  
Program Applies to CSP Only - If not applicable skip to Part V**

**1. Describe the efforts the firm uses to achieve all negotiated initiatives.**

[REDACTED] as such this initiative was not met. Because of the late notice to cancel this requirement, the SBLO was not able to replace or substitute this initiative [REDACTED]

Is the firm making adequate progress to meet all milestones for all negotiated initiatives?

☐ YES ☒ NO

**2. TARGET INDUSTRIES**

Has the contractor met, or are they on track to meet all selected industry category goals?

☒ YES ☐ NO

Describe the method the firm uses to improve performance by small business in the selected industry categories.

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]. Sikorsky was able to exceed the goals for [REDACTED] for this NAICS: [REDACTED]  
[REDACTED]  
[REDACTED]

**3. List the major programs(s) the firm is monitoring as requested by the customer.**

Program Name	Discuss:	Add/Remove
NA		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove

**4. Did the firm fully comply with the request to provide program specific information as requested by the customer?** ☒ YES ☐ NO

**5. PERFORM INTERIM ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN**

Indicate by analysis and contractor concurrence, one or more of the plan's goals may not be attained by end of performance.

[REDACTED]



**Part IV – Comprehensive Subcontracting Plan (CSP) Test  
Program Applies to CSP Only - If not applicable skip to Part V**

**1. Describe the efforts the firm uses to achieve all negotiated initiatives.**

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] This initiative was on track through third quarter of FY17 when Sikorsky's [REDACTED]  
[REDACTED] as such this initiative was not met. Because of the late notice to cancel this [REDACTED]

**Is the firm making adequate progress to meet all milestones for all negotiated initiatives?**

☐ YES ☒ NO

**2. TARGET INDUSTRIES**

**Has the contractor met, or are they on track to meet all selected industry category goals?**

☒ YES ☐ NO

**Describe the method the firm uses to improve performance by small business in the selected industry categories.**

[REDACTED] Sikorsky was able to exceed the goals for [REDACTED] for this  
NAICS. [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED] The SBP's validation of FY18 records support awards made for a total of [REDACTED]  
[REDACTED]

**3. List the major programs(s) the firm is monitoring as requested by the customer.**

Program Name	Discuss:	Add/Remove
NA		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove

**4. Did the firm fully comply with the request to provide program specific information as requested by the customer?** ☒ YES ☐ NO

**5. PERFORM INTERIM ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN**

Indicate by analysis and contractor concurrence, one or more of the plan's goals may not be attained by end of performance.

[REDACTED]

COMPREHENSIVE PLAN	Goals May Not Be Met – Check Box(es) where goals may not be met						Demonstrated Good Faith Efforts
	SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	
Midyear SSR Date Range:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Recommended Action:**

As of mid-year FY17 review, Sikorsky was meeting five out of six of its negotiated goals and was falling short in meeting the HUBZone goal. The DCMA SBP assessment was that the variance of [REDACTED] from the [REDACTED] HUBZone goal was not significant as there were six more months left of procurements and assurances were made by the SBLO on their ability to meet this goal based on [REDACTED]

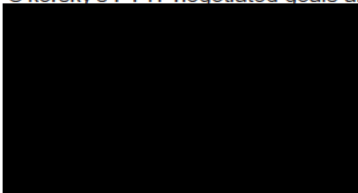
On the other hand, the SBP's mid-year review assessed the risk on not meeting their 2nd negotiated initiative to [REDACTED] as moderate but the status provided by the contractor mentioned the [REDACTED] was on track. During the review of Sikorsky's 3rd quarter report, the SBP requested via email on August 3, 2018 an updated status on meeting this initiative but no factors hindering the [REDACTED] was [REDACTED]

**6. PERFORM FINAL ANALYSIS OF COMPREHENSIVE SUBCONTRACTING**

COMPREHENSIVE PLAN	All Goals Were Met	Goals Not Met – Check Box(es)						Demonstrated Good Faith Efforts
		SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	
Year End SSR Date Range:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> No

**Recommended Action:**

Sikorsky's FY17 negotiated goals and actual performance:

**Part V – Program Rating Determination**

The DCMA Small Business Programs Compliance rating scale below is a modified version of FAR 42.1503-Contractor Performance Information, Procedures, and Table 42-2—Evaluation Ratings Definitions.

**Evaluation Ratings Definitions (for the Small Business Subcontracting Evaluation Factor, when FAR clause 52.219-9 is used).**

Rating	Definition	Note
<input type="checkbox"/> Exceptional	Performance meets Very Good rating and exceeds many subcontracting program elements to the Government's benefit. There should have been NO weaknesses identified. Identify multiple significant events that were exceptional and state how they were benefits to the Government.	To justify an Exceptional rating, identify multiple documented successes that exceed the subcontracting plan requirements. State how they were a benefit to small business utilization. An Exceptional rating signifies that the company has an exemplary program or practices that could be used as a model by other contractors in similar industries. There is no action taken or planned action to be taken for compliance with



COMPREHENSIVE PLAN	Goals May Not Be Met – Check Box(es) where goals may not be met						Demonstrated Good Faith Efforts
	SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	
Midyear SSR Date Range:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Recommended Action:**

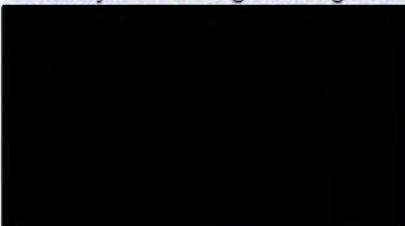
more months left of procurements and assurances were made by the SBLO on their ability to meet this goal based on [REDACTED]. On the other hand, the SBP's mid-year review assessed the risk on not meeting their 2nd negotiated initiative to [REDACTED] as moderate but the status provided by the contractor mentioned the [REDACTED] was on track. During the review of Sikorsky's 3rd quarter report, the SBP requested via email on August 3, 2018 an updated status on meeting this initiative but no factors hindering the [REDACTED] was communicated to the SBP at that time, accordingly it was expressed that the [REDACTED] was on track be placed in Q4.

**6. PERFORM FINAL ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN**

COMPREHENSIVE PLAN	All Goals Were Met	Goals Not Met – Check Box(es)						Demonstrated Good Faith Efforts
		SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	
Year End SSR Date Range:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> YES <input type="checkbox"/> No

**Recommended Action:**

Sikorsky's FY17 negotiated goals and actual performance:

**Part V – Program Rating Determination**

The DCMA Small Business Programs Compliance rating scale below is a modified version of FAR 42.1503-Contractor Performance Information, Procedures, and Table 42-2—Evaluation Ratings Definitions.

**Evaluation Ratings Definitions** (for the Small Business Subcontracting Evaluation Factor, when FAR clause 52.219-9 is used).

Rating	Definition	Note
<input type="checkbox"/> <b>Exceptional</b>	Performance meets Very Good rating and exceeds many subcontracting program elements to the Government's benefit. There should have been NO weaknesses identified. Identify multiple significant events that were exceptional and state how they were benefits to the Government.	To justify an Exceptional rating, identify multiple documented successes that exceed the subcontracting plan requirements. State how they were a benefit to small business utilization. An Exceptional rating signifies that the company has an exemplary program or practices that could be used as a model by other contractors in similar industries. There is no action taken or planned action to be taken for compliance with



- ☒ **Very Good** Performance meets Satisfactory rating and exceeds one subcontracting program element to the Government's benefit. There should have been NO weaknesses identified. Identify at least one significant event and state how it was a benefit to the Government.
- ☐ **Satisfactory** Performance meets the subcontracting program elements to the Government's benefit. The performance of the subcontracting plan requirement's elements or sub-elements being evaluated was accomplished with only minor problems or major problems the contractor recovered from without impact to the contract/order or subcontracting program elements. The corrective actions taken by the contractor were highly effective. Also, there should have been NO weaknesses identified. A fundamental principle of assigning this rating is that the contractor will not be evaluated with a rating lower than Satisfactory solely for not performing beyond the requirements of the subcontracting plan elements.
- 48 CFR 52.219-8, 13 CFR 125.3 & 48 CFR 52.219-9.
- To justify a Very Good rating, identify a significant documented success of exceeding one or more subcontracting plan elements. State how it was a benefit to small business utilization. Provided documentation of achievements and success stories to support efforts demonstrated. There is no action taken or planned action to be taken for compliance with 48 CFR 52.219-8, 13 CFR 125.3 & 48 CFR 52.219-9.
- Examples of meeting the subcontracting program elements: Meet or on track to meet all goals as negotiated per contract. The contractor met subcontracting plan(s) elements, instituting initiatives to assist, promote, and utilize SB, SDB, WOSB, HUBZone, VOSB, and SDVOSB. The contractor complied with 48 CFR 52.219-8, Utilization of Small Business Concerns which is inclusive of the requirement for a large business to get a written size self-certification from each small business subcontractor accurately reflecting the firm's socio-economic status. The contractor met any other small business participation requirements incorporated in the contract(s)/order(s). The contractor fulfilled the requirements of the Federal Government's Subcontracting program as outlined in 13 CFR 125.3 & 48 CFR 52.219-9. The contractor accurately completed and submitted Individual Subcontract Reports and/or Summary Subcontract Reports. The contractor responded to rejected reports within 30 days of rejection notice. Reviewed and accepted or rejected their other than small business (OTSB) lower tier subcontractors' Individual Subcontract Reports within 60 days of submittal. Ensured their OTSB responded to rejected reports within 30 days of rejection notice. The contractor ensured that all levels of OTSB subcontractor flow down the requirement to submit all of their Individual Subcontract Reports and/or Summary Subcontract Reports as required by regulation. Ensured that all levels of OTSB subcontractor flow down



the requirement to review and accept or reject their OTSB Individual Subcontract Reports within 60 days of submittal and respond to rejected reports within 30 days of rejection notice.

**Note:** To justify a Satisfactory rating, there are multiple documented successes to identify meeting or on track to meet the negotiated goals for each contract. Identify multiple documented successes of meeting subcontracting plan elements. There is no action taken or planned action to be taken for compliance with 48 CFR 52.219-8, 13 CFR 125.3 & 48 CFR 52.219-9.

- ☐ **Marginal** Performance does not meet some subcontracting program elements and contractual requirements. The contractual performance of the element or sub-element being evaluated reflects a serious problem for which the contractor has not yet identified corrective actions. The contractor's proposed actions appear only marginally effective or were not fully implemented.
- Examples of marginally meeting the subcontracting program elements:  
 Demonstrated a good faith effort to meet all of the negotiated subcontracting goals per contract. The contractor demonstrated a good faith effort to meet all of the subcontracting plan(s) elements, instituting initiatives to assist, promote, and utilize SB, SDB, WOSB, HUBZone, VOSB, and SDVOSB. Complied with 48 CFR 52.219-8, Utilization of Small Business Concerns is inclusive of the requirement for a large business to get a written size self-certification from each small business subcontractor accurately reflecting the firm's socio-economic status. The contractor demonstrated a good faith effort to meet any other small business participation requirements in the contract/order. Submitted Individual Subcontract Reports and/or Summary Subcontract Reports but not within the time frame required by regulation. The contractor has consulted DCMA and SBA for assistance. Demonstrated a good faith effort to review and accept or reject their OTSB lower tier subcontractors' Individual Subcontract Reports within 60 days of submittal. Demonstrated a good faith effort to ensure their OTSB responded to rejected reports within 30 days of rejection notice. The contractor demonstrated a good faith effort to ensure that all levels of OTSB subcontractor flow down the requirement to submit all of their Individual Subcontract Reports and/or Summary Subcontract Reports as required by regulation. Demonstrated a good faith effort to ensure that all levels of OTSB

subcontractor flow down the requirement to review and accept or reject their OTSB Individual Subcontract Reports within 60 days of submittal and respond to rejected reports within 30 days of rejection notice.

**Note:** To justify Marginal performance, identify a significant event in each category that the contractor had trouble overcoming and state how it impacted the Government and small business utilization. A Marginal rating should be supported by referencing the good faith effort to correct the deficiency. Identify multiple documented concerns of not meeting other subcontracting plan elements. There is evidenced action and planned action to be taken that demonstrated non-compliance pursuant to 48 CFR 52.219-8, 13 CFR 125.3 & 48 CFR 52.219-9. Explain the good faith effort taken by the OTSB to overcome the challenge and describe how it impacted small business utilization. The DCMA Small Business Professional (SBP) will notify the Administrative Contracting Officer (ACO) and will notify SBA's applicable Area Director in the SBA Area in which the firm business resides.

- ☐ **Unsatisfactory** – Performance does not meet most subcontracting program element requirements and recovery is not likely in a timely manner. The contractual performance of the element or sub-element contains a serious problem(s) for which the contractor's corrective actions appear or were ineffective.

Examples of Unsatisfactory performance of meeting the subcontracting program elements: A good faith effort was not demonstrated to meet all of the negotiated subcontracting goals per contract. A good faith effort was not demonstrated to meet all of the negotiated initiatives to assist, promote and utilize SB, SDB, WOSB, HUBZone, VOSB, and SDVOSB. A good faith effort was not demonstrated to comply with FAR 52.219-8, Utilization of Small Business Concerns which is inclusive of the requirement for a large business to get a written size self-certification from each small business subcontractor accurately reflecting the firm's socio-economic status. A good faith effort was not demonstrated to comply with any other small business participation requirements in the contract/order. A good faith effort was not demonstrated to review and accept or reject their OTSB lower tier subcontractors' Individual Subcontract Reports within 60 days of submittal. A good faith effort was not demonstrated to ensure that all levels of OTSB subcontractor flow down the requirement to review and accept or reject their OTSB Individual Subcontract Reports within 60 days of submittal and respond to rejected reports within 30 days of rejection notice.



**NOTE:** To justify an Unsatisfactory rating, identify multiple significant events in each category that the contractor had trouble overcoming and state how it impacted the Government. A singular problem, however, could be of such serious magnitude that it alone constitutes an unsatisfactory rating. An Unsatisfactory rating should be supported by referencing where there was no documentation to identify good faith effort to meet the subcontracting program elements. There is evidenced action and planned action to be taken that demonstrated non-compliance pursuant to 48 CFR , FAR 52.219-8, 13 CFR 125.3 & 48 CFR, FAR 52.219-9. Explain how they did not show a good faith effort to overcome the challenge and describe how it impacted small business utilization. The DCMA SBP will notify the ACO and SBA's applicable Area Director in the SBA Area in which the business firm resides. \*'"Negotiated goals" refers to the dollar and percentage goals in the approved subcontracting plan. (For rating purposes, the reviewer will compare the percentage goals to the percentage achievements).

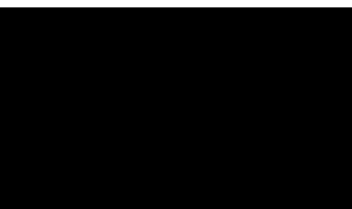
### 1. Exceptional Rating Justification

For an "Exceptional" rating, identify multiple documented successes that exceed the subcontracting plan requirements. State how they were a benefit to small business utilization. An Exceptional rating signifies that the company has an exemplary program or practices that could be used as a model by other contractors in similar industries. There is no action taken or planned action to be taken for compliance with 48 CFR 52.219-8, 13 CFR 125.3 & 48 CFR 52.219-9. [Field 38] DESCRIBE:

### 2. Very Good Rating Justification

For a "Very Good" rating, identify a significant documented success of exceeding one or more subcontracting plan elements. State how it was a benefit to small business utilization. Provided documentation of achievements and success stories to support efforts demonstrated. There is no action taken or planned action to be taken for compliance with 48 CFR 52.219-8, 13 CFR 125.3 & 48 CFR 52.219-9. [Field 38] DESCRIBE:

Sikorsky's exceeded 5 out of 6 FY17 negotiated goals for SB, SDB, WOSB, HUBZone and VOSB which merit them a Very Good Rating . They also met their SDVOSB goal.



Additionally, Sikorsky has been proactive in ensuring DCMA recommendations are address by

Finally, Sikorsky's is considered noteworthy.

**PART VI –Summary**

**1. Program Rating:** Very Good

**2. Areas that are noncompliant with the FAR, ISR, or SSR instructions.**

None

**3. Recommendations: (NOTE: A recommendation is an area to improve the program that is not required by regulation.)**

Sikorsky failed to notify DCMA that their initiative to [REDACTED] will not be met and provide a mitigation plan. DCMA recommends that Sikorsky promptly notifies the DCMA SPB whenever there is a change that will impact their performance. This notification should include a mitigation plan. Further, it is important that contractors negotiate attainable and measurable initiatives and target industry goals as part of their CSP plan.



**4. Additional Remarks:****5. Methodology for selection of contracts reviewed.**

This review was based on 1 DCMA administered contracts with small business subcontracting plans out of a total population of      DCMA administered contracts with small business subcontracting plans for the review period. Exhibit III.

This review was based on 15 subcontracts with large businesses over \$700,000, as applicable, out of a total population of      subcontracts with large businesses over \$700,000, as applicable, for the review period. Exhibit I Part 1.

This review was based on 25 subcontracts over \$150,000 out of a total population of      subcontracts over \$150,000 for the review period. Exhibit I Part 2.

The review was based on 81 subcontracts out of a total population of      subcontracts for the review period. Exhibit I Part 3.

The subcontracts were randomly selected. If a sampling methodology other than random was used state how the sample was selected.

**6. Exit Interview Participants:****Government:**

1. Luz M. Vasquez
2. Shelly Thomas
3. Kimberly Gaskins
4. Michael Turnyanszki
- 5.
- 6.

**Contractor:**

1. Martha Crawford
2. Amy Johnson
3. Pat DeSanto
4. Owen Whitehurst
5. Mike Ciocca
6. Keith Richardson

**7. DCMA Small Business Professional Signature:**

VASQUEZ.LUZ.MARIA.1182397349

Digitally signed by VASQUEZ.LUZ.MARIA.1182397349  
Date: 2018.04.12 13:37:07 -05'00'

**8. DCMA Small Business Center Supervisor Signature:**

THOMAS.SHELLY.S.1201284615

Digitally signed by THOMAS.SHELLY.S.1201284615  
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=DCMA,  
cn=THOMAS.SHELLY.S.1201284615  
Date: 2018.04.13 10:36:59 -04'00'

**Summary****SUMMARY SUBCONTRACT REPORT****1. Type of Plan:**

[REDACTED]

**2. DUNS #:**

[REDACTED]

**3. Corporation, Company or Subdivision Covered****a. Vendor Name:**

[REDACTED]

**b. Vendor Physical Address:****Street Address:**

[REDACTED]

**City:**

[REDACTED]

**State:**

[REDACTED]

**Zip+4:**

[REDACTED]

**Country:**

[REDACTED]

**c. Vendor Mailing Address:****Street Address:**

[REDACTED]

[REDACTED]

**State:**

[REDACTED]

**Zip+4:**

[REDACTED]

[REDACTED]

**4. Date Submitted:**

[REDACTED]

**5. Contact Information:**

[REDACTED]

**6. Reporting Period:**

[REDACTED]

**a. Year:**

[REDACTED]

**Report Actions****Action History****May 09, 2017 11:58 am**  
Report Accepted (Luz M Vasquez)**May 09, 2017 11:38 am**  
Report Revised (Martha Crawford)**May 02, 2017 9:45 am**  
Report Rejected (Luz M Vasquez)**Apr 28, 2017 12:58 pm**  
Report Submitted (Martha Crawford)**Last 3 Notes****Luz M Vasquez May 09, 17 - 11:58**  
Acceptance Note  
reviewed and accepted by Luz M. Vasquez,  
DCMA PA**Luz M Vasquez May 02, 17 - 09:45**Rejection Note  
This report is rejected to allow Sikorsky to  
upload an updated Attachment A, contract list  
into the system. Attachment A should reflect  
any new DoD contracts issued during the  
reporting period (Oct-Mar 17).

**7. Agency to which the report is being submitted:****8. Report Submitted As:****9. Contractor's Major Products or Service Lines**

This reflects the description of the two major products and/or services, and the NAICS codes for the product/services lines under the approved subcontracting plan that the contractor provides to the agency for which this report is being submitted to.

**a. Product or Service #1:****b. Product or Service #2:**

## SUBCONTRACTING DOLLARS FOR DEPARTMENT OF DEFENSE

	Whole Dollars	Percent
<b>1a. SMALL BUSINESS CONCERNS</b>		
<b>1b. LARGE BUSINESS CONCERNS</b>		
<b>1c. TOTAL</b>		

	Whole Dollars	Percent
<b>2. SMALL DISADVANTAGED BUSINESS (SDB) CONCERNS</b>		
<b>3. WOMEN-OWNED SMALL BUSINESS (WOSB) CONCERNS</b>		
<b>4. HISTORICALLY BLACK COLLEGES AND UNIVERSITIES (HBCU) AND MINORITY INSTITUTIONS (MI)</b> <i>* This field is not required for DoD and Coast Guard contracts.</i>		
<b>5. HUBZone SMALL BUSINESS (HUBZone SB) CONCERNS</b>		
<b>6. VETERAN-OWNED SMALL BUSINESS CONCERNS</b>		
<b>7. SERVICE-DISABLED VETERAN-OWNED SMALL BUSINESS CONCERNS</b>		
<b>8. ALASKA NATIVE CORPORATIONS (ANCs) AND INDIAN TRIBES THAT HAVE NOT BEEN CERTIFIED BY THE SMALL BUSINESS ADMINISTRATION AS SMALL DISADVANTAGED BUSINESSES</b>		
<b>9. ALASKA NATIVE CORPORATIONS (ANCs) AND INDIAN TRIBES THAT ARE NOT SMALL BUSINESSES</b>		

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**10. Remarks:**

If you entered (0) zero in the small business section of this report or failed to meet the dollar or percentage goals in the Commercial Subcontracting Plan, use this section to explain the reason for any shortfalls and your future plan of action. You may also enter explanations and/or comments you think will be helpful to the Government official who reviews this report.

[REDACTED]

---

**11. Contractors Official Who Administers Subcontracting Program**

This is the name and contact information (telephone number and email address) for the individual who administers the contractor's Small Business Subcontracting Program.

**a. Name:**

[REDACTED]

[REDACTED]

(b) (6)

---

**12. Certification:**

This is a testament that the data being submitted on the report is accurate and that the dollars and percentages reported do not include lower tier subcontracts (except as set forth for ANC and Indian Tribes for more information visit

<http://www.arnet.gov/far/facframe.html> see FAC 05-019). If "No" is selected the report will be "Rejected"

Yes

---

**13. Chief Executive Officer(CEO)**

This is the full name and title of the CEO (if you do not use the title CEO this is the most Senior Executive in your organization) for the company submitting this report. **No delegation of authority is accepted.**

**a. Name:**

[REDACTED]

**b. Title:**

[REDACTED]

**c. Date:**

[REDACTED]

**14. CEO Approval:**

This is a self-certification that the individual whom is listed as the CEO on this report will sign a paper print-out of this report and keep it on file.

[REDACTED]

**15. Please enter the email address of the Government employee(s) and/or other person(s) to be notified that you have submitted this report.:**

By listing an e-mail address, a notification will be sent to listed parties advising them that a subcontracting report has been submitted in eSRS for the Government's review. The Federal Government Agency will not be notified via email unless you enter a notification e-mail address.

(b) (6)

**SUBCONTRACTING DOLLARS FOR MILITARY SERVICES  
AND OTHER DEFENSE AGENCIES (Optional)**

Pick one or more Military Services or other Defense Agencies directly below DOD and enter in dollar amounts

[REDACTED]

**SUBCONTRACTING DOLLARS FOR PROGRAMS (Optional)**

Provide one or more Program Titles and enter in dollar amounts

[REDACTED]

**SUPPLEMENTAL DOCUMENTATION****1. Documents:**

Attach additional documents

**Additional Document:****File Name:**

[REDACTED]

**Document Description:**

[REDACTED]

**Additional Document:****File Name:**

[REDACTED]



<b>Document Description:</b> [REDACTED]
<b>Additional Document:</b> <b>File Name:</b> [REDACTED]
<b>Document Description:</b> [REDACTED]
<b>Additional Document:</b> <b>File Name:</b> [REDACTED]
<b>Document Description:</b> [REDACTED]
<b>Additional Document:</b> <b>File Name:</b> [REDACTED]
<b>Document Description:</b> [REDACTED]
<b>Additional Document:</b> <b>File Name:</b> [REDACTED]
<b>Document Description:</b> [REDACTED]
<b>Additional Document:</b> <b>File Name:</b> [REDACTED]
<b>Document Description:</b> [REDACTED]

**DEFENSE CONTRACT MANAGEMENT AGENCY (DCMA)  
SMALL BUSINESS SUBCONTRACTING PROGRAM COMPLIANCE REVIEW**  
In accordance with FAR 19.706 and FAR 52.219-9

**Part I – General Information**

**1.a. Contractor****Name:** Sikorsky, A Lockheed Martin Company(SIK)**Address:** 6900 Main Street**City/State/Zip:** Stratford, CT 06615-9129**CAGE(s) [Field 1 ]:** 78286**DUNS:** 835551474**1.b. Small Business Liaison Officer (SBLO) [Field 2]:****Name:** Martha Crawford**Phone:** [REDACTED]**E-mail:** [REDACTED]**1.c. Alternate Small Business Liaison Officer (SBLO) [Field 3]:****Name:** None**Phone:****E-mail:****2. DCMA Small Business Professional****Name:** Micole Stephens-Mack**Title:** Small Business Professional**Phone:** [REDACTED]**E-mail:** [REDACTED]**3. Administrative Contracting Officer****Name:** Kimberly Gaskins**Location:** DCMA Sikorsky**Phone:** [REDACTED]**E-mail:** [REDACTED]**4. Small Business Administration (SBA) Representative****Name:** Sandy Liu**Phone:** [REDACTED]**E-mail:** [REDACTED]**5. DCMA/Small Business Administration (SBA), joint review**☐ Yes☒ No**Note:** always "No" unless it is an approved follow up type review.**6. Review type:** On-site ☒ Virtual Review ☐**7. Period Covered by this Review****a. From:** October 1, 2014**b. To:** September 30, 2015**8.a. Date of this review:** February 22, 2016**b. Rating of this review:** Exceptional**9.a. Date of last review [Field 4]:** March 2015**b. Rating of last review [Field 5]:** Marginal

**10. Department of Defense (DoD) Ratios**

a. Total annual company sales [Field 6]: [REDACTED]

b. Total annual sales for DoD [Field 7]: [REDACTED]

**11. Type of Subcontract Plan(s)**

☐ Individual Plan(s): Number of plans:

☐ Commercial Plan: Approved by:

Plan year:

☒ Comprehensive Plan: Approved by: Tatia M. Evelyn-Bellamy

Plan year: FY15

☐ Master Plan: Approved by:

Three (3) Year Period Ending:

**12. Mentor Protégé Agreements [Field 8]:**

[REDACTED]

## Part II – Contractor's Subcontracting Performance

### 1. Accuracy of Small Business Reports [Summary Subcontract Reports (SSRs) and Individual Subcontracting Reports (ISRs)]

- a. Were small business, small disadvantaged business, women-owned small business, HUBZone small business, service-disabled veteran-owned small business, and veteran-owned small business reported in accordance with FAR 52.219-8(a) on SSRs and ISRs [Field 36]? – See Exhibit I

☒ YES ☐ NO

Describe:

The current FY15 SSR was reviewed for accuracy validating the proper categorization of business concerns in their appropriate small business category. A sample was selected from the universe of all small business purchase orders within FY15. Exhibit I contains the documented evidence of Sikorsky's placement of small business concerns within their proper category. Sikorsky is operating in accordance with the subject FAR element.

- b. Does the contractor correctly rely on written representations by their subcontractors regarding their status as a small business concern, a veteran-owned small business concern, a service-disabled veteran-owned small business concern, a small disadvantaged business concern, or a women-owned small business concern in accordance with FAR 52.219-8(d)(1) on SSRs and ISRs [Field 36]? – See Exhibit I ☒ YES ☐ NO

Describe:

[REDACTED] Sikorsky's reliance on this written representation of a supplier's business size is in accordance with FAR 52.219-8(d) (1). Form SA1048 was updated September 2015 as recommended by the FY14 DCMA 640 Review and now includes penalties for misrepresenting a supplier's small business concern status. [REDACTED] Sikorsky is compliant with the subject FAR element.

- c. Does the contractor rely on System for Award Management (SAM) for subcontractor size or socioeconomic representations and certifications? ☐ YES ☒ NO If Yes, do all purchase orders [subcontracts] include a clause that notifies the subcontractor by submission of the offer that the size or socioeconomic representations and certifications in SAM are current, accurate and complete as of the date of the offer for the subcontract in accordance with 13 CFR 125.3(c)(v) [Field 36]. ☐ YES ☐ NO ☒ NOT APPLICABLE

- d. Does the contractor adequately include credit card purchases on SSRs in accordance with FAR 52.219-9(l)(2)(i)(A) or FAR 52.219- 9(2)(ii)(A) and Individual Subcontracting Reports (ISRs) in accordance with FAR 52.219-9(l)(1)(i) [Field 11]? ☐ YES ☒ NO

Describe:

[REDACTED]



**2. Overall subcontracting performance – SSR submission FAR 52.219-9(l)(2)**

- a. Were SSRs submitted accurately in accordance with the FAR and SSR instructions at Electronic Subcontracting Reporting System (eSRS.gov) [Field 9]? ☒ YES ☐ NO**  
**Describe:**

As indicated on the Exhibit of this document, Sikorsky records supplier sizes appropriately and in accordance with the subject FAR clause and per the eSRS instructions. There was a minor discrepancy. The discrepancy involved the minority classification, a category not collected by eSRS. Sikorsky mistakenly added the minority spend to the SDB category, once determined that it did not represent SDB it was removed from the SDB category and placed in the appropriate small business category on the revised SSR. The correction did not impact Sikorsky meeting or exceeding their SDB goal of [REDACTED] now reporting [REDACTED] DCMA finds Sikorsky compliant with the element of the FAR.

- (1) Were SSRs submitted under individual contract plans ☐ YES ☒ NO** If no, skip to question (2)

- (a) FAR 52.219-9(l)(2)(i)(A) Does the SSR encompass all subcontracting under prime contracts and subcontracts with the awarding agency, regardless of the dollar value of the subcontracts? ☐ YES ☐ NO
- (b) FAR 52.219-9(l)(2)(i)(A)(C) Did the contractor submit a separate SSR to each executive agency covering only that agency's contracts, provided at least one of that agency's contracts is over \$650,000 prior to 1 October 2015) \$700,000 (after 1 October 2015) (over \$1.5 million for construction of a public facility) and contains a subcontracting plan? ☐ YES ☐ NO
- (c) Is the SSR submitted annually, within thirty days (30) after the end of the Government's fiscal year [September 30] in accordance with FAR 52.219-9(l)(2)(i)(A)(D) inclusive of DoD Deviation 2013-O0014? ☐ YES ☐ NO
- (d) FAR 52.219-9(l)(2)(i)(A)(E) Were subcontract awards that were related to work for more than one executive agency appropriately allocated on the SSR? ☐ YES ☐ NO

- (2) Commercial Plan ☐ YES ☐ NO** If no, skip to Question 9.

- (a) Does the commercial SSR include all subcontract awards under the commercial plan in effect during the Government's fiscal year in accordance with FAR 52.219-9(l)(2)(ii)(A)? ☐ YES ☐ NO
- (b) Is the commercial SSR submitted annually, within thirty days (30) after the end of the Government's fiscal year in accordance with FAR 52.219-9(l)(2)(ii)(B)? ☐ YES ☐ NO
- (c) Has the contractor specified the percentage of dollars attributable to each agency from which contracts for commercial items were received on the SSR in accordance with FAR 52.219-9(l)(2)(ii)(C)? ☐ YES ☐ NO

- (3) Is the CEO (the most the Senior Executive in the organization) named on SSR [Block 13 of SSR]? ☒ YES ☐ NO**

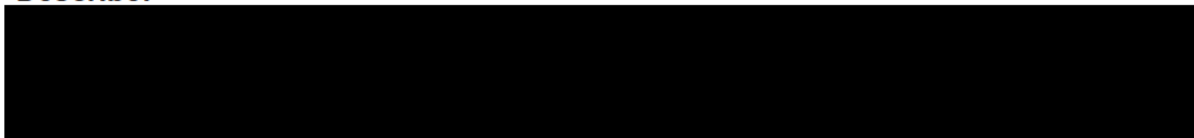
- (4) Did the CEO sign and keep the signed SSR on file? ☒ YES ☐ NO**

- b. Are indirect costs included in the SSR in accordance with 13 CFR 125.3(c)(iv) [Field 10]? ☒ YES ☐ NO**



- c. Perform trend analysis of historical small business goal achievements (*last 5 years, if available*) from eSRS. Describe the underlying cause of trends, positive or negative. See Exhibit II.

Describe:



**3. Individual Subcontracting Report (ISRs) performance– (Not applicable to Commercial or Comprehensive Plans) FAR 52.219-9(I)(1)**

- a. Were ISRs submitted accurately in accordance the FAR 52.219-9(I)(1) and ISR instructions at eSRS.gov [Field 11]:? ☐ YES ☐ NO

Describe:

Not applicable per instructions for Comprehensive Plan Participants.

- (1) FAR 52.219-9(I)(1)(i): During contract performance, were ISRs submitted within thirty days of March 31 and September 30? Exhibit III ☐ YES ☐ NO

- (2) FAR 52.219-9(I)(1)(i): Were final ISRs submitted for each contract within thirty days of contract completion? ☐ YES ☐ NO

- (3) FAR 52.219-9(I)(1)(ii): If options were included on the requirement, was the dollar goal inserted on the ISR a sum of the base period through the current option? ☐ YES ☐ NO

- (4) FAR 52.219-9(I)(1)(iii): Did the contractor acknowledge receipt or reject the ISRs from the subcontractor(s)? See Exhibit ☒ YES ☐ NO  
☐ NOT APPLICABLE

- b. Perform analysis of all regular and final individual subcontracting reports (ISRs). Did the contractor demonstrate a good faith effort in accordance with FAR 19.701 as determined by FAR 19.705-7(d)?

☐ YES ☐ NO - See Exhibit III.

Not applicable.

### Part III – Contractor's Small Business Program

#### 1. Review of Small Business Program in accordance with FAR 52.219-9

a. FAR 52.219-9(d)(1) Does the contractor express goals in terms of percentage of total planned subcontracting dollars for each small business category, in all plans?

☒ YES ☐ NO

b. FAR 52.219-9(d)(2) Are there statements of total dollars planned to be subcontracted for each small business category in all plans? ☒ YES ☐ NO

c. FAR 52.219-9(d)(3) Is there a description of the principal types of supplies and services to be subcontracted for each small business category? ☒ YES ☐ NO

d. FAR 52.219-9(d)(4) Briefly describe the methodology used by the contractor to develop subcontracting goals. Is the contractor adhering to the method described in the plans to develop subcontracting goals? ☒ YES ☐ NO

DESCRIBE:

FY15 represented a fair number of challenges. Goals were requested after FY15 began.

[REDACTED]

Sikorsky's SBLO Handbook  
and does comply with FAR

52.219-9 (d)(4). DCMA has reviewed Sikorsky's goal methodology and found it acceptable.

e. FAR 52.219-9(d)(5) Briefly describe the methodology utilized by the contractor to identify potential sources for solicitation purposes. Is the contractor adhering to the method described in the approved small business subcontracting plans? ☒ YES ☐ NO

DESCRIBE:

[REDACTED]

Sikorsky is  
compliant with FAR 52.219-9(d)(5) and DCMA has reviewed Sikorsky's practice and attendance records and found it acceptable.

- f. FAR 52.219-9(d)(6) Are indirect costs included in establishing subcontracting goals?  
☒ YES ☐ NO Briefly describe and analyze the methodology utilized by the contractor to determine share of indirect costs for small business, veteran-owned small business concerns, service-disabled veteran-owned small business concerns, HUBZone small business concerns, small disadvantaged business concerns, and women-owned small business concerns.

☐ NOT APPLICABLE

If applicable, is the contractor adhering to the method described in the small business subcontracting plans? ☒ YES ☐ NO

DESCRIBE:

Sikorsky is adhering to the method described in FY15 CSP. [REDACTED]

[REDACTED]. Indicated on the FY14 Compliance Review was a recommendation that the indirect allocation calculation be amended. The allocation rate used to determine the indirect dollars could include dollars that [REDACTED]. This subject is under review. Guidance from the Office of the Secretary of Defense Small Business Programs was requested. A resolution has not been determined.

- g. FAR 52.219-9(d)(7) Is the name of individual employed by the contractor who administers the subcontracting program included in the plans, with a description of the duties?

☒ YES ☐ NO Are they fulfilling the small business duties as described in the plans?

☒ YES ☐ NO

DESCRIBE:

[REDACTED]. This information was reviewed. The SBLO is carrying out the duties as stated in the plan. Sikorsky is compliant with the subject FAR element.

- h. FAR 52.219-9(d)(8) Briefly describe the efforts by the contractor to ensure small business concerns have an equitable opportunity to compete for subcontracts. Is the contractor adhering to the method described in the plans to assure equitable subcontracting opportunities exist for small business? ☒ YES ☐ NO

DESCRIBE:

[REDACTED]. In practice, Sikorsky provides small business concerns the necessary tools to become a supplier through [REDACTED]

[REDACTED] Additionally [REDACTED] provides the necessary framework for small businesses to bid on upcoming work. [REDACTED]

[REDACTED]. DCMA has reviewed training documents and attendance information and found it in accordance with subject FAR element.

- i. FAR 52.219-9(d)(9)

(1) Are there assurances that the offeror will include the clause FAR 52.219-8 "Utilization of Small Business Concerns" in all subcontracts that offer further subcontracting opportunities? ☒ YES ☐ NO

Is the contractor adhering to this assurance? ☒ YES ☐ NO See Exhibit I

(2) Is FAR 52.219-9 included in subcontracts over \$650,000 (prior to 1 October 2015) \$700,000 (after 1 October 2015)(\$1.5 million for construction of any public facility with further subcontracting possibilities) [Field 35]. ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO ☐ NOT APPLICABLE  
See Exhibit I

(3) Are there subcontracting plans in place with their subcontractors who have subcontracts over \$650,000 (prior to 1 October 2015) \$700,000 (after 1 October 2015) (\$1.5 million for construction of any public facility with further subcontracting possibilities) with large businesses? ☒ YES ☐ NO  
Is the contractor adhering to this assurance [Field 35]? ☒ YES ☐ NO  
☐ NOT APPLICABLE See Exhibit I

j. FAR 52.219-9(d)(10) Are there assurances that the offeror will –

(1) Cooperate in studies or surveys as may be required in accordance with FAR 52.219-9(d)(10)(i) and FAR 52.219-8(c)? ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO

(2) Submit periodic reports to determine extent of compliance to plans in accordance with FAR 52.219-9(d)(10)(ii)?  
☒ YES ☐ NO Is the contractor adhering to this assurance? ☒ YES ☐ NO

(3) Include assurances the contractor will submit Individual Subcontracting Reports (ISRs) and/or Summary Subcontract Reports (SSRs) in accordance with FAR 52.219-9(d)(10)(iii)? ☐ YES ☒ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO

(4) Ensure that its subcontractors agree to submit Individual Subcontracting Reports (ISRs) and/or Summary Subcontract Reports (SSRs) in accordance with FAR 52.219-9(d)(10)(iii)? ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO  
☐ NOT APPLICABLE See Exhibit I

(5) Provide its prime contract number, its DUNS number, and the e-mail address of the offeror's official responsible for acknowledging receipt of or rejecting the ISRs, to all first-tier subcontractors with subcontracting plans so they can enter this information into the eSRS when submitting their ISRs in accordance with FAR 52.219-9(d)(10)(v)? ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO  
☐ NOT APPLICABLE

(6) Require that each subcontractor with a subcontracting plan provide the prime contract number, its own DUNS number, and the e-mail address of the subcontractor's official responsible for acknowledging receipt of or rejecting the ISRs, to its subcontractors with subcontracting plans in accordance with FAR 52.219-9(d)(10)(vi)? ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO ☐ NOT APPLICABLE

k. FAR 52.219-9(d)(11) A description of the types of records that will be maintained concerning procedures that have been adopted to comply with the requirements and goals in the plans including:

- (1) Source lists (e.g. SAM), guides, and other data the contractor uses to identify small businesses in accordance with FAR 52.219-9(d)(11)(i). Is the contractor maintaining records as described in the plans [Field 14]? ☒ YES ☐ NO

DESCRIBE:

[REDACTED]

This process was reviewed and found compliant with the subject FAR clause.

- (2) List organizations that are contacted by the contractor in an attempt to locate sources that are small businesses in accordance with FAR 52.219-9(d)(11)(ii). Is the contractor maintaining records as described in the plans [Field 15] ?

☒ YES ☐ NO

DESCRIBE:

[REDACTED]

Sikorsky maintains records that confirms events attended. DCMA has reviewed supporting documentation that shows Sikorsky compliant the subject FAR element.

- (3) Records for each subcontract of more than \$150,000 in accordance with FAR 52.219-9(d)(11)(iii). See Exhibit I. Is the contractor maintaining records as described in the plans [Field 18]? ☒ YES ☐ NO ☐ NOT APPLICABLE

DESCRIBE:

As indicated on Exhibit I, records on subcontracts over the \$150K threshold are maintained in accordance with the subject FAR clause.

- (4) Records of any outreach efforts to contact trade associations, business development organizations, conferences and trade fairs and veteran service organizations in accordance with FAR 52.219-9(d)(11)(iv). Is the contractor maintaining records as described in the plans [Field 19]? ☒ YES ☐ NO

DESCRIBE:

[REDACTED]

Furthermore, records are maintained that confirms events attended. Supporting documents have been reviewed of events attended, Sikorsky is compliant with the subject FAR element.



- (5) Records of internal guidance and encouragement to buyers through (A) workshops, seminars, training, etc. and (B) monitoring performance to evaluate compliance with program requirements in accordance with FAR 52.219-9(d)(11)(v). Is the contractor maintaining records as described in the plans [Field 20]?

☒ YES ☐ NO

DESCRIBE:

[REDACTED]

[REDACTED] . DCMA has reviewed the aforementioned documents and found Sikorsky compliant with the subject FAR element.

- (6) FAR 52.219-9(d)(11)(vi) Records 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. Is the contractor maintaining records as described in the plans [Field 21]? ☒ YES ☐ NO

☒ NOT APPLICABLE to Commercial Plans

DESCRIBE:

Sikorsky maintains records in accordance with internal guidance provided in both Sikorsky's FY15 CSP and SBLO Handbook. [REDACTED]

[REDACTED] FY14 review results recommended Sikorsky include the definition of each small business concern and penalties for misrepresenting its supplier size. This recommendation was adopted by Sikorsky. FY15 revealed the changes Sikorsky made to the form. DCMA finds Sikorsky compliant with the subject FAR element.

**I. FAR 52.219-9(e) In order to effectively implement this plan to the extent consistent with efficient contract performance the contractor shall perform the following functions:**

- (1) Is the contractor assisting small businesses by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules to facilitate the participation by such concerns in accordance with FAR 52.219-9(e)(1)? ☒ YES ☐ NO

DESCRIBE:

[REDACTED]

[REDACTED] Sikorsky is compliant with the subject FAR element.

- (2) Is the contractor providing adequate and timely consideration of small businesses in all "make-or-buy" decisions in accordance with FAR 52.219-9(e)(2)? ☒ YES ☐ NO

DESCRIBE:

[REDACTED]

[REDACTED] . DCMA reviewed the Work Transition documentation and found it compliant with the subject FAR clause.

- (3) Is the contractor counseling and discussing subcontracting opportunities with small businesses in accordance with FAR 52.219-9(e)(3)? ☐ YES ☐ NO

DESCRIBE:

[REDACTED]

Sikorsky is compliant with the subject FAR clause.

- (4) Is the contractor confirming a HUBZone small business concern is a certified HUBZone small business by accessing the System for Award Management (SAM) database or by contacting SBA in accordance with FAR 52.219-9(e)(4) and FAR 52.219-8(d)(2)? See Exhibit I ☒ YES ☐ NO

- (5) Is the contractor providing notice to subcontractors concerning penalties and remedies for misrepresentations of business status as a small business for the purpose of obtaining a subcontract in accordance with 15 U.S.C. 645(d) and FAR 52.219-9(e)(5) [Field 22]? ☒ YES ☐ NO

DESCRIBE:

Penalties for the misrepresentation of a suppliers small business classification is included on Sikorsky's SA1048 Annual Supplier Certification Form as recommended by the outcome of the FY14 Compliance Review. [REDACTED]

[REDACTED] Sikorsky's practice of providing notice to subcontractors for misrepresentation is compliant with FAR 52.219-9(e)(5).

- (6) Is the contractor providing notice to inform each unsuccessful small business offeror in writing of the name and location of the apparent successful offeror prior to award of the contract in which a small business concern received a small business preference for subcontracts over the Simplified Acquisition Threshold in accordance with FAR 52.219-9(e)(6)? ☐ YES ☐ NO ☒ NOT APPLICABLE

## 2. Other Regulatory Compliance

- a. Has the contractor provided the maximum practicable opportunity to participate in performing contracts let by any Federal agency, including contracts and subcontracts for subsystems, assemblies, components, and related services for major systems for small business concerns, veteran-owned small business concerns, service-disabled veteran-owned small business concerns, HUBZone small business concerns, small disadvantaged business concerns, and women-owned small business concerns in accordance FAR 52.219-8(b)? ☒ YES ☐ NO

DESCRIBE:

[REDACTED] . Sikorsky is compliant with the subject FAR clause.

- b. Has the contractor established procedures to ensure the timely payment of amounts due pursuant to the terms of their subcontracts with small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns in accordance with FAR 19.702 and FAR 52.219-8(b)?  
☒ YES ☐ NO  
 Is the contractor ensuring timely payment of subcontractors? ☒ YES ☐ NO
- c. FAR 52.232-40: Providing Accelerated Payments to Small Business Subcontractors. If this clause is included in their prime contract(s) is the contractor making the required accelerated payments to their small business subcontractor(s), as prescribed [Field 23]? ☐ YES ☐ NO ☒ NOT APPLICABLE
- d. Has the contractor adequately addressed all previous Corrective Action Plans (CAPs) [Field 24]? ☒ YES ☐ NO ☐ NOT APPLICABLE.  
 If applicable, describe the previous findings/deficiencies and the corrective actions implemented.

### 3. Additional Program Administration

- a. Has a company-wide small business policy statement been issued by current senior management and disseminated throughout the company [Field 25]? ☐ YES

Issued By: [REDACTED] Title: [REDACTED] Date: [REDACTED]

☒ NO

- b. Small Business Liaison Officer (SBLO) appointment/authority placement in the organization:

- (1) Has the SBLO been formally appointed by senior level management to effectively administer the program [Field 26]? ☒ YES ☐ NO

- (2) SBLO is a: ☐ Corporate ☒ Division (if a division SBLO, describe the relationship between this division and the corporate SBLO).

Comments:

During FY15, Sikorsky was a division of United Technology Corporation. On November 6, 2015 they were acquired by Lockheed Martin and now operates as a wholly owned subsidiary maintaining their Division Plan status.

[REDACTED]

[REDACTED]

- (3) Is there an organization chart that displays the position of the SBLO within the organization [Field 27]? ☒ YES ☐ NO

**c. Monitoring small business program performance and requirements:**

- (1) Are senior management and staff briefed regularly on achievement and/or program deficiencies [Field 28]? ☒ YES ☐ NO

Comments:

[REDACTED]

- (2) What does the contractor do to improve subcontracting performance if goals are not being met [Field 29]?

[REDACTED]

**d. Small Business Subcontracting Procedures**

- (1) Does the contractor have company policies or procedures in place for the small business subcontracting program [Field 30]? ☒ YES ☐ NO

Comments:

[REDACTED]

- (2) Do the policies or procedures promote participation of small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns?

☒ YES Comments:

Overall, Sikorsky has policies and procedures that cover all aspects of their Small Business Subcontracting Plan and Program.

[REDACTED]

☐ NO Comments:

☐ NOT APPLICABLE

**Part IV – Comprehensive Subcontracting Plan (CSP) Test  
Program Applies to CSP Only**

**1. Describe the efforts the firm uses to achieve all negotiated initiatives.**

[REDACTED] A considerable effort made by Sikorsky was [REDACTED].

**Is the firm making adequate progress to meet all milestones for all negotiated initiatives?**

☒ YES ☐ NO

**2. TARGET INDUSTRIES:**

**Has the contractor met, or are they on track to meet all selected industry category goals?**

☒ YES ☐ NO

**Describe the method the firm uses to improve performance by small business in the selected industry categories.**

[REDACTED] Sikorsky surpassed the negotiated goals for FY15 target industry categories. [REDACTED]

**3. List the major programs(s) the firm is monitoring as requested by the customer.**

Program Name	Discuss:	Add/Remove	
		<input type="checkbox"/> Add	<input type="checkbox"/> Remove
		<input type="checkbox"/> Add	<input type="checkbox"/> Remove
		<input type="checkbox"/> Add	<input type="checkbox"/> Remove
		<input type="checkbox"/> Add	<input type="checkbox"/> Remove

**4. Did the firm fully comply with the request to provide program specific information as requested by the customer?** ☒ YES ☐ NO

**5. PERFORM INTERIM ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN**

**Indicate by analysis and contractor concurrence, one or more of the plan's goals may not be attained by end of performance.**

Sikorsky is on track toward goal achievement.



COMPREHENSIVE PLAN	Goal May Not Be Met – Check Box(es) where goals may not be met						Demonstrated Good Faith Efforts
	SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	
Midyear SSR Date Range:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**Recommended Action:**

As of Mid-year FY 15 performance, Sikorsky demonstrated Good Faith Effort. An adequate assessment could not be determined based on the NDAA(National Defense Authorization Act) being signed 12/19/14 which extended the CSP Test Program through 12/31/17. Guidance was provided 1/30/15 that extended FY14 plan to 3/31/15, and requested the FY15 plan addressed 4/1 through 9/30/15. FY15 Plan was finally signed July 9, 2015 with goals. [REDACTED]

**6. PERFORM FINAL ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN**

COMPREHENSIVE PLAN	All Goals Were Met	Goals Not Met – Check Box(es)						Demonstrated Good Faith Efforts
		SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	
Year End SSR Date Range:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> No

**Recommended Action:**

Sikorsky achieved and exceeded all of the negotiated subcontracted goals according to the FY15 CSP and performance. There is no recommended action.

**Part V – Program Rating Determination**

The DCMA Small Business Programs Compliance rating scale below is a modified version of FAR 42.1503-Contractor Performance Information, Procedures, and Table 42-2—Evaluation Ratings Definitions.

**Evaluation Ratings Definitions (for the Small Business Subcontracting Evaluation Factor, when FAR clause 52.219-9 is used).**

Rating	Definition	Note
<input checked="" type="checkbox"/> <b>Exceptional</b>	Performance meets Very Good rating and exceeds many subcontracting program elements to the Government's benefit. There should have been NO weaknesses identified. Identify multiple significant events that were exceptional and state how they were benefits to the Government.	To justify an Exceptional rating, identify multiple documented successes that exceed the subcontracting plan requirements. State how they were a benefit to small business utilization. An Exceptional rating signifies that the company has an exemplary program or practices that could be used as a model by other contractors in similar industries. There is no action taken or planned action to be taken for compliance with

<input type="checkbox"/> <b>Very Good</b>	<p>Performance meets Satisfactory rating and exceeds one subcontracting program element to the Government's benefit. There should have been NO weaknesses identified. Identify at least one significant event and state how it was a benefit to the Government.</p>	<p>48 CFR 52.219-8, 13 CFR 125.3 &amp; 48 CFR 52.219-9.</p> <p>To justify a Very Good rating, identify a significant documented success of exceeding one or more subcontracting plan elements. State how it was a benefit to small business utilization. Provided documentation of achievements and success stories to support efforts demonstrated. There is no action taken or planned action to be taken for compliance with 48 CFR 52.219-8, 13 CFR 125.3 &amp; 48 CFR 52.219-9.</p>
<input type="checkbox"/> <b>Satisfactory</b>	<p>Performance meets the subcontracting program elements to the Government's benefit. The performance of the subcontracting plan requirement's elements or sub-elements being evaluated was accomplished with only minor problems or major problems the contractor recovered from without impact to the contract/order or subcontracting program elements. The corrective actions taken by the contractor were highly effective. Also, there should have been NO weaknesses identified. A fundamental principle of assigning this rating is that the contractor will not be evaluated with a rating lower than Satisfactory solely for not performing beyond the requirements of the subcontracting plan elements.</p>	<p>Examples of meeting the subcontracting program elements: Meet or on track to meet all goals as negotiated per contract. The contractor met subcontracting plan(s) elements, instituting initiatives to assist, promote, and utilize SB, SDB, WOSB, HUBZone, VOSB, and SDVOSB. The contractor complied with 48 CFR 52.219-8, Utilization of Small Business Concerns which is inclusive of the requirement for a large business to get a written size self-certification from each small business subcontractor accurately reflecting the firm's socio-economic status. The contractor met any other small business participation requirements incorporated in the contract(s)/order(s). The contractor fulfilled the requirements of the Federal Government's Subcontracting program as outlined in 13 CFR 125.3 &amp; 48 CFR 52.219-9. The contractor accurately completed and submitted Individual Subcontract Reports and/or Summary Subcontract Reports. The contractor responded to rejected reports within 30 days of rejection notice. Reviewed and accepted or rejected their other than small business (OTSB) lower tier subcontractors' Individual Subcontract Reports within 60 days of submittal. Ensured their OTSB responded to rejected reports within 30 days of rejection notice. The contractor ensured that all levels of OTSB subcontractor flow down the requirement to submit all of their Individual Subcontract Reports and/or Summary Subcontract Reports as required by regulation. Ensured that all levels of OTSB subcontractor flow down</p>



the requirement to review and accept or reject their OTSB Individual Subcontract Reports within 60 days of submittal and respond to rejected reports within 30 days of rejection notice.

**Note:** To justify a Satisfactory rating, there are multiple documented successes to identify meeting or on track to meet the negotiated goals for each contract. Identify multiple documented successes of meeting subcontracting plan elements. There is no action taken or planned action to be taken for compliance with 48 CFR 52.219-8, 13 CFR 125.3 & 48 CFR 52.219-9.

<input type="checkbox"/> <b>Marginal</b>	<p>Performance does not meet some subcontracting program elements and contractual requirements. The contractual performance of the element or sub-element being evaluated reflects a serious problem for which the contractor has not yet identified corrective actions. The contractor's proposed actions appear only marginally effective or were not fully implemented.</p>	<p>Examples of marginally meeting the subcontracting program elements:            Demonstrated a good faith effort to meet all of the negotiated subcontracting goals per contract. The contractor demonstrated a good faith effort to meet all of the subcontracting plan(s) elements, instituting initiatives to assist, promote, and utilize SB, SDB, WOSB, HUBZone, VOSB, and SDVOSB. Complied with 48 CFR 52.219-8, Utilization of Small Business Concerns is inclusive of the requirement for a large business to get a written size self-certification from each small business subcontractor accurately reflecting the firm's socio-economic status. The contractor demonstrated a good faith effort to meet any other small business participation requirements in the contract/order. Submitted Individual Subcontract Reports and/or Summary Subcontract Reports but not within the time frame required by regulation. The contractor has consulted DCMA and SBA for assistance. Demonstrated a good faith effort to review and accept or reject their OTSB lower tier subcontractors' Individual Subcontract Reports within 60 days of submittal. Demonstrated a good faith effort to ensure their OTSB responded to rejected reports within 30 days of rejection notice. The contractor demonstrated a good faith effort to ensure that all levels of OTSB subcontractor flow down the requirement to submit all of their Individual Subcontract Reports and/or Summary Subcontract Reports as required by regulation. Demonstrated a good faith effort to ensure that all levels of OTSB</p>
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subcontractor flow down the requirement to review and accept or reject their OTSB Individual Subcontract Reports within 60 days of submittal and respond to rejected reports within 30 days of rejection notice.

**Note:** To justify Marginal performance, identify a significant event in each category that the contractor had trouble overcoming and state how it impacted the Government and small business utilization. A Marginal rating should be supported by referencing the good faith effort to correct the deficiency. Identify multiple documented concerns of not meeting other subcontracting plan elements. There is evidenced action and planned action to be taken that demonstrated non-compliance pursuant to 48 CFR 52.219-8, 13 CFR 125.3 & 48 CFR 52.219-9. Explain the good faith effort taken by the OTSB to overcome the challenge and describe how it impacted small business utilization. The DCMA Small Business Professional (SBP) will notify the Administrative Contracting Officer (ACO) and will notify SBA's applicable Area Director in the SBA Area in which the firm business resides.

- ☐ **Unsatisfactory** – Performance does not meet most subcontracting program element requirements and recovery is not likely in a timely manner. The contractual performance of the element or sub-element contains a serious problem(s) for which the contractor's corrective actions appear or were ineffective.

Examples of Unsatisfactory performance of meeting the subcontracting program elements: A good faith effort was not demonstrated to meet all of the negotiated subcontracting goals per contract. A good faith effort was not demonstrated to meet all of the negotiated initiatives to assist, promote and utilize SB, SDB, WOSB, HUBZone, VOSB, and SDVOSB. A good faith effort was not demonstrated to comply with FAR 52.219-8, Utilization of Small Business Concerns which is inclusive of the requirement for a large business to get a written size self-certification from each small business subcontractor accurately reflecting the firm's socio-economic status. A good faith effort was not demonstrated to comply with any other small business participation requirements in the contract/order. A good faith effort was not demonstrated to review and accept or reject their OTSB lower tier subcontractors' Individual Subcontract Reports within 60 days of submittal. A good faith effort was not demonstrated to ensure that all levels of OTSB subcontractor flow down the requirement to review and accept or reject their OTSB Individual Subcontract Reports within 60 days of submittal and respond to rejected reports within 30 days of rejection notice.



**NOTE:** To justify an Unsatisfactory rating, identify multiple significant events in each category that the contractor had trouble overcoming and state how it impacted the Government. A singular problem, however, could be of such serious magnitude that it alone constitutes an unsatisfactory rating. An Unsatisfactory rating should be supported by referencing where there was no documentation to identify good faith effort to meet the subcontracting program elements. There is evidenced action and planned action to be taken that demonstrated non-compliance pursuant to 48 CFR , FAR 52.219-8, 13 CFR 125.3 & 48 CFR, FAR 52.219-9. Explain how they did not show a good faith effort to overcome the challenge and describe how it impacted small business utilization. The DCMA SBP will notify the ACO and SBA's applicable Area Director in the SBA Area in which the business firm resides.

\* "Negotiated goals" refers to the dollar and percentage goals in the approved subcontracting plan. (For rating purposes, the reviewer will compare the percentage goals to the percentage achievements).

## 1. Exceptional Rating Justification

a. Did the Contractor exceed all statutory goals or goals as negotiated? If no, skip to question

2. ☒ YES ☐ NO

Comments:

Based on the FY15 CSP, Sikorsky exceeded their negotiated small business goals, Industry Targets and Initiatives. Sikorsky is applauded for their achievement.

b. Has the contractor had exceptional success with initiatives to assist, promote, and utilize small business (SB), small disadvantaged business (SDB), women-owned small business (WOSB), HUBZone small business, veteran-owned small business (VOSB) and service-disabled veteran-owned small business (SDVOSB) [Field 31]?

☒ YES ☐ NO

Comments:

Exceptional success was shown by Sikorsky

success was also displayed in . This program facilitates superior performance using

Several SB are benefiting from this program

c. Has the contractor complied with FAR 52.219-8, Utilization of Small Business Concerns? Have they exceeded any other small business participation requirements incorporated in the contract, including the use of small businesses in mission critical aspects of the program [Field 32]? ☒ YES ☐ NO

Comments:

Sikorsky complies with FAR 52.219-8. When flowing the subject Small Business clause down to their large business suppliers and subcontracting plans are received the goals are examined and approved when they are in accordance with the expected goals and FAR requirements.



- d. Has the contractor gone above and beyond the required elements of the subcontracting plan and other small business requirements of the contract/order [Field 33]?

☒ YES ☐ NO

Comments:

Sikorsky supply's aircraft to military departments and agencies. DCMA reviewed the [REDACTED] offered by Sikorsky and determined that Sikorsky provides excellent [REDACTED]  
[REDACTED]

- e. Has the contractor completed and submitted Individual Subcontracting Reports (ISRs) and/or Summary Subcontract Reports (SSRs) in an accurate and timely manner. See Part II, Exhibits II and III for details. ☒ YES ☐ NO

Comments:

FY15 annual and semi-annual reports were submitted on time and accurate.

- f. Discuss multiple or a significant events and state how they were a benefit to small business utilization. A singular benefit, however, could be of such magnitude that it constitutes a significant benefit to small business [Field 34].

Discuss:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## 2. Very Good Justification

- a. Has the contractor met all of the statutory goals or goals as negotiated? If no, skip to question 3. ☐ YES ☐ NO

Comments:

- b. Has the contractor had significant success with initiatives to assist, promote and utilize SB, SDB, WOSB, HUBZone, VOSB, and SDVOSB? Have they complied with FAR 52.219-8, Utilization of Small Business Concerns [Field 32]? ☐ YES ☐ NO

Comments:

c. Has the contractor met or exceeded any other small business participation requirements incorporated in the contract, including the use of small businesses in mission critical aspects of the program [Field 33]?

☐ YES ☐ NO

Comments:

d. Has the contractor gone above and beyond the required elements of the subcontracting plan? ☐ YES ☐ NO

Comments:

e. Has the contractor completed and submitted Individual Subcontracting Reports (ISRs) and/or Summary Subcontract Reports (SSRs) in an accurate and timely manner? See Part II, Exhibits II and III.

☐ YES ☐ NO

Comments:

### 3. Satisfactory Justification

a. Has the contractor demonstrated a good faith effort to meet all of the negotiated subcontracting goals in the various socio-economic categories for the current period?

☐ YES ☐ NO

Comments:

b. Has the contractor complied with FAR 52.219-8, Utilization of Small Business Concerns? Has the contractor met any other small business participation requirements included in the contract [Field 32]?

☐ YES ☐ NO Comments:

c. Has the contractor fulfilled the requirements of the subcontracting plan included in the contract?

☐ YES ☐ NO

Comments:

d. Has the contractor completed and submitted Individual Subcontracting Reports (ISRs) and/or Summary Subcontract Reports (SSRs) in an accurate and timely manner? See Part II, Exhibits II and III.

☐ YES ☐ NO

Comments:

#### 4. Marginal Justification

a. Is the contractor deficient in meeting key subcontracting plan elements?

☐ YES ☐ NO

Comments:

b. Is the contractor deficient in complying with FAR 52.219-8, Utilization of Small Business Concerns, and any other small business participation requirements in the contract

[Field 32]? ☐ YES ☐ NO

Comments:

c. Did the contractor not submit Individual Subcontracting Reports (ISR) and/or Summary Subcontract Reports (SSRs) in an accurate or timely manner? See Part II, Exhibits II and III.

☐ YES ☐ NO

Comments:

d. The contractor failed to satisfy one or more requirements of a corrective action plan (CAP) currently in place; however, does show an interest in bringing performance to a satisfactory level and has demonstrated a commitment to apply the necessary resources to do so. A corrective action plan is required. See Part III, Question 2.c.

☐ YES ☐ NO

Comments:

---

**5. Unsatisfactory Justification:**

a. The contractor is noncompliant with FAR 52.219-8 and 52.219-9, and any other small business participation requirements in the contract.

☐ YES ☐ NO

Comments:

b. The Individual Subcontracting Reports (ISRs) and/or Summary Subcontract Reports (SSRs) are not submitted in an accurate or timely manner. See Part II, Exhibits II and III.

☐ YES ☐ NO

Comments:

c. The contractor shows little interest in bringing performance to a satisfactory level or is generally uncooperative. A corrective action plan is required.

☐ YES ☐ NO

Comments:



**PART VI –Summary****1. Program Rating:**

Sikorsky is rated Exceptional. Sikorsky exceeded their FY15 CSP Small Business goals as well as goals in their Industry Targets and Initiatives. Sikorsky displayed countless efforts that provided inclusion of small business concerns. Notable mention is the [REDACTED]. Participation in this program demands superior performance, consistent quality and on-time delivery.

Secondly, Sikorsky provided [REDACTED] provided a tremendous amount of information to small business on [REDACTED]

Additionally, Sikorsky has implemented adopted all of the recommendations provided on the previous with the exception of the recommendation involving non-contract spend. Once additional guidance is provided, Sikorsky will incorporate changes, or statements within their Small Business Program.

Sikorsky is applauded for their many efforts.

**2. Deficiencies:**

None

**3. Recommendations:**

None

**4. Additional Remarks:**

None

**5. Methodology for selection of contracts reviewed.**

This review was based on 2339 contracts with small business subcontracting plans out of a total population of [REDACTED] contracts with small business subcontracting plans for the review period. Exhibit III.

This review was based on 27 subcontracts with large businesses over \$650,000/\$700,000, as applicable, out of a total population of [REDACTED] subcontracts with large businesses over \$650,000/\$700,000, as applicable, for the review period. Exhibit I Part 1.

This review was based on 25 subcontracts over \$150,000 out of a total population of [REDACTED] subcontracts over \$150,000 for the review period. Exhibit I Part 2.

The review was based on 38 subcontracts out of a total population of [REDACTED] subcontracts for the review period. Exhibit I Part 3.

The subcontracts were randomly selected. If a sampling methodology other than random was used state how the sample was selected.

**6. Exit Interview Participants:****Government:**

1. Micole Stephens, Small Business Professional
2. Eric Claud, Michelle Vaughn, Small Business Professionals
3. Kim Gaskin, DACO

**Contractor:**

1. Martha Crawford, SBLO
2. Janet Duffey, VP Supply Management
3. John Palumbo, Senior VP, Operations

**7. DCMA Small Business Professional Signature:**

STEPHENS.MICOLE.1230430612

Digitally signed by STEPHENS.MICOLE.1230430612  
 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=DCMA,  
 cn=STEPHENS.MICOLE.1230430612  
 Date: 2016.04.15 20:41:21 -05'00'

**8. DCMA Small Business Center Supervisor Signature:**EVELYN-  
BELLAMY.TATIA.M.1228577665

Digitally signed by EVELYN-BELLAMY.TATIA.M.1228577665  
 DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=DCMA, cn=EVELYN-  
 BELLAMY.TATIA.M.1228577665  
 Date: 2016 05 05 15:21:29 -04'00'



**DEFENSE CONTRACT MANAGEMENT AGENCY**  
SMALL BUSINESS CENTER – COMPREHENSIVE SUBCONTRACTING PROGRAM DIVISION  
18901 S. WILMINGTON AVE.  
BUILDING DH2, SUITE 224M  
CARSON, CA 90746

7 March 2014

Mr. Mick Maurer  
President  
Sikorsky Aircraft Corporation (SAC)  
6900 Main Street  
Stratford, CT 06615

Dear Mr. Maurer:

On February 4-6, 2014, Judy Collier, Program Manager, DCMA Small Business Center, conducted a review of your FY13 Small Business Subcontracting Program to assure compliance with applicable laws and regulations. The review covered your company's overall subcontracting program on contracts covered under the FY13 DOD Comprehensive Subcontract Plan (Test Program).

As a result of the review, your Small Business Program is rated Outstanding. Thank you for your commitment to the objectives of the small business program.

In addition to yourself and Ms. Amy Johnson, Director, Supply Management, please convey my sincere appreciation to Mr. Francisco Vasquez, SBLO, for his cooperation and detailed preparedness during the review process.

The results of our review will be forwarded to the appropriate DOD, Military Service and other Defense Agency Small Business Program Offices. When requested by the DOD buying offices, we will provide a copy of the enclosed DCMA Form 640 with the results of our review.

**Please keep in mind that the dissemination of this review is for official government use only and distributed only within government agencies or directly through the subject contractor. Any further distribution is at the contractor's discretion.**

If you have any questions or if you need further assistance, please contact Ms. Judy Collier at

(b) (6)

(b) (6)

Sincerely,

(b) (6)

Margaret Trimble-Williams  
Group Chief  
Comprehensive Subcontracting Program Group  
DCMA Small Business Center

LMC0001585

Enclosure:  
SAC FY13 640 Review

Shane Eddy, Senior VP of Operations, SAC  
Janet Duffy, VP of Supply Chain, SAC  
Amy M. Johnson, Director Supply Management, SAC  
Keith Richardson, Manager Business Process Management, SAC  
Francisco Vasquez, SBLO, SAC  
Col. Gregg B. Monk, Commander, DCMA  
Judy Collier, Program Manager, DCMA  
Joseph McDonnell, Cost Monitor, DCMA  
Kimberly Gaskins, DACO, DCMA  
James A. Baltrush, ACO, DCMA  
Sandi Liu, SBA  
Stephanie Lewis, SBA

Military Services:

Carol White – Air Force  
Teresa Rendon – Air Force  
Jean Smith – Air Force  
Rachael Harris – Air Force  
Tracey Pinson-Dennis – Army  
Pamela Monroe – Army  
Lee Rosenberg – MDA  
Jerrol Sullivan – MDA  
Laura Anderson – MDA  
Sean Crean – Navy  
Kenneth Carkhuff – NAVAIR  
Emily Harman – Navy  
Brad Taylor – Navy  
Patricia Obey – Navy  
Linda Oliver – OSD  
Janice Buffler – OSD  
Wendy Despres – OSD

**DEFENSE CONTRACT MANAGEMENT AGENCY (DCMA)**  
**REVIEW OF CONTRACTOR'S COMPREHENSIVE SUBCONTRACTING PROGRAM**

**PART I – GENERAL INFORMATION**

<b>1. CONTRACTOR:</b> Name: Sikorsky Aircraft Corporation (SAC) Address 1: 6900 Main Street Address 2: City/State/Zip: Stratford, CT 06615 CAGE: 78286                      DUNS: 83-555-1474	<b>1.a. SMALL BUSINESS LIAISON OFFICER (SBLO)</b> Name: Francisco Vasquez Phone: (b) (6)                      FAX: (b) (6) E-mail: (b) (6)
<b>2. PROGRAM MANAGER, COMPREHENSIVE PROGRAM</b>  Name: Judy A. Collier Phone: (b) (6)                      FAX: E-mail: (b) (6)	<b>1.b. ALTERNATE SMALL BUSINESS LIAISON OFFICER</b> Name: Phone:                      FAX: E-mail: <b>3. GROUP CHIEF, COMPREHENSIVE PROGRAM PROGRAM</b> Name: Margarette Trimble-Williams Phone: (b) (6)                      FAX: (b) (6) E-mail: (b) (6)
<b>4. SMALL BUSINESS ADMINISTRATION (SBA) COMMERCIAL MARKETING REPRESENTATIVE (CMR)</b> Name: Sandy Liu Phone: (b) (6)                      FAX: (b) (6) E-mail: (b) (6)	<b>5. ADMINISTRATIVE CONTRACTING OFFICER</b> Name: Kimberly Gaskins Phone: (b) (6)                      FAX: E-mail: (b) (6)

DCMA/SMALL BUSINESS ADMINISTRATION (SBA), JOINT REVIEW:

☐ Yes                      ☒ No IF NOT, WHY NOT: Virtual Review

Review setting:    on-site review    ☐    virtual review    ☒

<b>6. PERIOD COVERED BY THIS REVIEW:</b> 6.a. From: 1 October 2012	<b>7.a. DATE OF THIS REVIEW:</b> Feb. 4-6, 2014 <b>7.b. TYPE OF REVIEW:</b> Virtual Review	<b>8.a. DATE OF LAST REVIEW DATA:</b> 25 January, 2013 <b>8.b. TYPE OF LAST REVIEW DATA</b> Site Review
6.b. To: 30 September 2013	<b>7.c. RATING OF THIS REVIEW</b> Outstanding	<b>8.c. RATING OF LAST REVIEW DATA:</b> Highly Successful
	<b>7.d. RISK OF THIS REVIEW:</b> Moderate	<b>8.d. RISK OF LAST REVIEW DATA</b> Moderate

**9. DOD RATIOS:**

a. Total Annual Company Sales: [REDACTED]

b. Total dollar value of contracts that are with DoD (including those without plans): [REDACTED]

**10. TYPE OF SUBCONTRACT PLAN(S):**

☐ Individual Plan(s): Number of plans:

☐ Commercial Plan: Approving authority:                      Period Covered From:                      Period Covered To:

☒ Comprehensive Plan: Approving authority: Margarette Trimble-Williams    Period Covered From: 1Oct12    Period Covered To: 30Sep13

☐ Master Plan: Approving authority:                      Period Covered From:                      Period Covered To:

☐ Other: Specify Type

**PART II – CONTRACTOR'S COMPREHENSIVE SUBCONTRACTING PERFORMANCE**



### SUBCONTRACTING PERFORMANCE FACTORS

*Compliance with FAR requirements in this part establish the basic requirements for an acceptable rating*

#### 1. OVERALL SUBCONTRACTING PERFORMANCE – SUMMARY SUBCONTRACTING REPORT (SSR) SUBMISSION (FAR 52-219-9(d) (1), (2) & (10) (iii) & (iv))

- a. WERE SSR REPORTS SUBMITTED IN ACCORDANCE WITH FAR REQUIREMENTS AND SSR INSTRUCTIONS?  
☒ YES    ☐ NO. Identify deficiencies: SAC submitted on time for October 2013, however due to verification issues with their internal purchasing system that separated the report it was resubmitted in January 2014.
- b. VERIFY ACCURACY OF SSR REPORTS: The original SSR was submitted incorrectly in October 2013. This was not discovered until December 2013 after the DCMA Program Manager had accepted the original submission. The root cause was the mechanism to differentiation of small business spend to the appropriate socioeconomic category was not included in an upgrade to Sikorsky's SAP system upgrade for the fourth quarter of FY13. As a result the SSR was rejected and resubmitted to ensure the correct percentages were able to be verified during the 640 Review. The SSR was verified to ensure the goals and percentages were correctly reported.
- c. PERFORM TREND ANALYSIS OF PAST PERFORMANCE AND DISCUSS TRENDS, POSITIVE OR NEGATIVE:

	Total Subcontracting Dollars (per the SSR)		Small Business			
Fiscal Year	\$ Goal	\$ Actual	\$ Goal	\$ Actual	% Goal	% Actual

	Small Disadvantaged Business				Women-Owned Small Business			
Fiscal Year	\$ Goal	\$ Actual	% Goal	% Actual	\$ Goal	\$ Actual	% Goal	% Actual

	HBCU/MI				Hub-Zone Businesses			
Fiscal Year	\$ Goal	\$ Actual	% Goal	% Actual	\$ Goal	\$ Actual	% Goal	% Actual

	Veteran-Owned Small Business				Service Disabled Veteran-Owned Small Business			
Fiscal Year	\$ Goal	\$ Actual	% Goal	% Actual	\$ Goal	\$ Actual	% Goal	% Actual

Special Note: The 2010 program reviews determined 2009 SSRs invalid. Thus, they are omitted from the -table above. DCMA will only evaluate the actual achievement reported in 2010, 2011, 2012, and 2013.

SAC has continued to meet and exceed all negotiated small business subcontracting goals since FY12. SAC did meet and exceed their SB goal.

**Small Disadvantaged Business (SDB):**

SAC has not been able to meet the DOD minimum subcontracting goal. SAC did meet and exceed their SDB goal.

**Women Owned Small Business (WOSB):**

SAC continues to exceed the DoD minimum subcontracting goal. SAC did meet and exceed their WOSB goal.

**HUBZone Small Business:**

SAC did meet its negotiated HUBZone goal.

**Veteran Owned Small Business (VOSB):**

SAC did meet and exceed its VOSB goal.

**Service Disabled Veteran Owned Small Business (SDVOSB):**

SAC did meet and exceed its SDVOSB goal.

**2. FOR COMPREHENSIVE SUBCONTRACTING PLANS ONLY INITIATIVES:**

- a. Describe the efforts the firm uses to achieve all negotiated initiatives? Describe:

[REDACTED]

[REDACTED]  
Sikorsky is on track to meet this goal by year end FY14.

[REDACTED]  
Sikorsky has met this goal.

[REDACTED]  
Sikorsky has met this goal.

[REDACTED]  
Sikorsky has met this goal.

[REDACTED]  
Sikorsky has met this goal.

Is the firm making adequate progress to meet all milestones for all negotiated initiatives? ☒ Yes ☐ No

b. TARGET INDUSTRIES:

Has the contractor met, or are they on track to meet all selected industry category goals? ☐ Yes ☒ No

[REDACTED]  
Sikorsky has met this goal.

[REDACTED]  
Sikorsky did not achieve this goal.

Describe the method the firm uses to improve performance by small business in the selected industry categories?

[REDACTED]  
However, Sikorsky was unable to achieve this goal.

c. List the major programs (s) the firm is monitoring as requested by the customer.

Currently, there aren't any customer requests through DCMA for program level reporting.

Program Name	Discuss:	Add/Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove
		<input type="checkbox"/> Add <input type="checkbox"/> Remove

- d. Did the firm fully comply with the request to provide program specific information as requested by the customer?  
☐ Yes ☒ No Not Applicable

- e. **PERFORM INTERIM ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN (SF 295/SSR).**  
 Indicate by analysis and contractor concurrence, one or more of the plan's goals **may not be** attained by end of performance.

COMPREHENSIVE PLAN	Goal May Not Be Met – Check Box(es) where goals may not be met						Demonstrated Good Faith Effort
	SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	
Midyear SF295/SSR Date Range: Oct 1, 2012 – Mar 31, 2013	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

[REDACTED] . Sikorsky is currently exceeding its FY13 goals for SB, SDB, WOSBs, VOSBs and SDVOSBs. Sikorsky is below the HUBZone spend goal.

- f. **PERFORM FINAL ANALYSIS OF COMPREHENSIVE SUBCONTRACTING PLAN (SF 295/SSR).**

COMPREHENSIVE PLAN	All Goals Were Met	Goals Not Met – Check Box(es)						Demonstrated Good Faith Effort
		SB	SDB	WOSB	HUBZ	VOSB	SDVOSB	
Year End SF295/SSR Date Range: Oct 1, 2012 – SEP 30, 2013	<input checked="" type="checkbox"/> YES <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> No

Recommended Action:

[REDACTED] . Sikorsky met all of its FY13 goals for SBs, SDBs, WOSBs, HUBZone, VOSBs and SDVOSBs.

### PART III – CONTRACTOR'S COMPREHENSIVE SMALL BUSINESS PROGRAM ADMINISTRATION PROGRAM ADMINISTRATION FACTORS

*Compliance with FAR requirements in this part establish the basic requirements for an acceptable rating*

#### REVIEW OF SMALL BUSINESS PROGRAM (FAR 52.219-9)

1. ARE THERE WRITTEN PROCEDURES IN PLACE REGARDING SMALL BUSINESS PROGRAM ADMINISTRATION FOR:

- a. FAR 52.219-9 (d) (1) Does the firm express goals in terms of percentage of totals planned subcontracting dollars for each small business category, in all plans? ☒ YES ☐ NO DESCRIBE HERE:

The SAC FY13 Comprehensive Subcontracting Plan (CSP) [REDACTED]



does comply with FAR 52.219-9 (d)(1). [REDACTED]

The SAC SBLO Handbook [REDACTED]

[REDACTED] does comply with FAR 52.219-9 (d)(1). DCMA finds this be acceptable.

- b. FAR 52.219-9 (d) (2) Are there statements of total dollars planned to be subcontracted for each small business category in all plans? ☒ YES ☐ NO DESCRIBE HERE:

The SAC FY13 Comprehensive Subcontracting Plan (CSP) [REDACTED]

[REDACTED] and does comply with FAR 52.219-9 (d) (2). [REDACTED]

The SAC SBLO Handbook [REDACTED]

[REDACTED] and does comply with FAR 52.219-9 (d)(2). DCMA finds this be acceptable.

- c. FAR 52.219-9 (d) (3) Is there a description of the principal types of supplies and services to be subcontracted for each small business category? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

[REDACTED]

DCMA has concluded that the provided support documentation does substantiate compliance with FAR 52.219-9(d)(3). DCMA finds this to be acceptable.

- d. FAR 52.219-9 (d) (4) Briefly describe and analyze the methodology used by the firm to develop subcontracting goals. Is the firm adhering to the method described in the plan to develop subcontracting goals? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

The SAC SBLO Handbook [REDACTED]

[REDACTED] and does comply with FAR 52.219-9 (d)(4). DCMA finds this be acceptable.

- e. FAR 52.219-9 (d) (5) Briefly describe and analyze the methodology utilized by the firm to identify small business sources. Is the firm adhering to the method described in the plan to develop small business sources? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]



and provided to the DCMA Program Manager for verification purposes. This was documented

\_\_\_\_\_. However, it does further expand upon this process with \_\_\_\_\_ which provides an accurate flow-chart of \_\_\_\_\_.

During the Review the SBLO demonstrated correct and proper usage in identifying a HUBZone via SAM and through the Small Business Dynamic Search Website. [REDACTED]

This was seen in the verification of the event log. Sikorsky does comply with FAR 52.219-9 (d) (5). DCMA finds this acceptable.

- f. FAR 52.219-9 (d) (6) Briefly describe and analyze the methodology utilized by the firm to determine and allocate indirect subcontracting dollars for the SF295/SSR (and the SF 294, if applicable). Are they adhering to the policy, and or the method described in the plan to determine indirect costs? ☒ YES ☐ NO DESCRIBE HERE:

The SB subcontracting data calculation is consistent with Summary Subcontract Report (SSR) instructions.

was verified during the review. This is found to be acceptable. Sikorsky does comply with FAR 52.219-9 (d)(6). DCMA finds this be acceptable.

- g. FAR 52.219-9 (d) (7) Briefly describe and analyze the small business related duties of the individual who administers the subcontracting program/plan. Are they fulfilling the small business duties as described in the plan?  
☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

[REDACTED]

[REDACTED]

The DCMA Program Manager examined the extended listing of duties and responsibilities and has found this contractor to be performing their duties at the highest level of competence. Sikorsky does comply with FAR 52.219-9 (d)(7). DCMA finds this be acceptable.

- h. FAR 52.219-9 (d) (8) Briefly describe and analyze the efforts by the firm to ensure equitable subcontracting opportunities exist for small businesses. Is the firm adhering to the method described in the plan to assure equitable subcontracting opportunities exist for small business? ☐ YES ☐ NO DESCRIBE HERE:

DCMA has analyzed efforts employed by SAC buyers who are required to use suppliers from its parent company's, United Technologies Companies (UTC), supplier database with emphasis on utilizing UTC suppliers. [REDACTED] the document was provided for review to the DCMA Program Manager.

[REDACTED]

[REDACTED]. These were found to be acceptable as evidenced by the examples in Exhibit 1. Sikorsky does comply with FAR 52.219-9 (d)(8). DCMA finds this be acceptable.

- i. FAR 52.219-9 (d) (9) Briefly describe and analyze the methodology utilized by the firm for maintaining records of purchases over \$650,000, (\$1.5M for construction) with large businesses that require subcontracting plans. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

[REDACTED] Evidence that SAC is appropriately maintaining records are recorded on the Exhibit 1 of this report.

[REDACTED]

A sample of "flow-down" compliance with FAR 52.219-9 clause was requested for Large Business awarded purchase orders over \$650,000. A sample size of 9 was selected for review of the compliance flow-down. All subcontracting plans were found to be acceptable. Sikorsky complies with FAR 52.219-9 (d) (9). DCMA found this to be acceptable.

- j. FAR 52.219-9 (d) (10) Does the firm cooperate in studies or surveys as may be required, submit periodic reports to determine extent of compliance to plans. Submit ISR, Subcontracting Report for Individual Contracts, and/or SSR, Summary Subcontract Report, in accordance with 52.219-9, and ensure that its subcontractors agree to submit ISR and SSR. ☐ YES ☒ NO DESCRIBE HERE:

The original SSR was submitted incorrectly in October 2013. This was not discovered until December 2013 after the DCMA Program Manager had accepted the original submission. The root cause was the mechanism to differentiate the small business spend to the appropriate socioeconomic category was not included in an upgrade to Sikorsky SAP system upgrade for the fourth quarter of FY13. As a result the SSR was rejected and

resubmitted to ensure the correct percentages were able to be verified during the 640 Review. The SSR was verified to ensure the goals and percentages were correctly reported. Sikorsky provided the DCMA Program Manager a summary of the incident including a corrective action that testing will be verified with process owner to ensure that this will not be a reoccurring problem. There was no NASA for FY 13 subcontracting for ISR Submittal.

SAC has submitted the SSR as required by FAR 52.219-9 (d)(1), and ensures that their subcontractors who received/receives a subcontract \$500,000, \$550,000 or \$650,000 or over submits ISR via eSRS for review and approval of the SBLO (detailed in Part III, 1.j.). ISRs for the applicable subcontractor were requested from Sikorsky by the DCMA Program Manager. [REDACTED]

[REDACTED] In addition to flowing down 52.219-9 in the Sikorsky Term and Conditions comply with the instructions. The supporting ISRs were not provided for any of the Small Business Plans in exhibit 1.

Sikorsky is not in compliance with FAR 52.219-9 (d) (10). **DCMA does not find this acceptable.** It is recommended that Sikorsky be able to provide supporting documentation to ensure the subcontractors with applicable Small Business Plans are submitting ISRs in accordance with FAR 52.219-9 (d) (10). Please see the corrective action in Part V Summary and Recommendations.

- k. FAR 52.219-9 (d) (11) (i) Briefly describe and analyze the Source lists (e.g. CCR), guides, and other data the firm uses to identify small businesses. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO  
DESCRIBE HERE:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] During the review the SBLO was able to demonstrate the ability to navigate www.sam.gov, Small Business Dynamic Search in addition to Sikorsky's internal data base SA8068 Supplier Information Forms. Sikorsky does comply with FAR 52.219-9 (d)(11)(i). DCMA finds this be acceptable.

- l. FAR 52.219-9 (d) (11) (ii) List organizations that are contacted by the firm in an attempt to locate sources that are small businesses. Is the firm utilizing the list of organizations described in the plan? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

the information that is provided in the FY13 CSP. During the 640 review Sikorsky was able to demonstrate to the Program Manager they are effectively utilizing these sources as evidenced by meeting all of their goals and by providing a sample exercise to lookup vendors, and verification of attendance at several of the events of the [REDACTED]. Sikorsky does comply with FAR 52.219-9 (d)(11)(ii). DCMA finds this be acceptable.

m. FAR 52.219-9 (d) (11) (iii) Briefly describe and analyze the methodology utilized by the firm for maintaining records of purchases over \$150,000. Are they adhering to the method described in the plan? ☒ YES ☐ NO  
DESCRIBE HERE:

[REDACTED]

The PUR02-02-004 purchasing guidance procedure was provided to the DCMA Program Manager for review, and was determined adequate. Evidence that SAC is appropriately maintaining records are recorded on the Exhibit 1 of this report. Sikorsky complies with FAR 52.219-9 (d) (11)(iii). DCMA finds this to be acceptable.

n. FAR 52.219-9 (d) (11) (iv) Briefly describe and analyze the records the firm maintains to document outreach efforts with trade associations business development organizations, conferences, trade fairs, and veteran service organizations, to locate small businesses. Is the firm maintaining records as described in the plan? ☒ YES ☐ NO  
DESCRIBE HERE:

[REDACTED] During the review a calendar of Small Events were provided to the Program Manager in addition to a list of attendees. [REDACTED]

[REDACTED]

[REDACTED] Attendance records were verified by the DCMA Program Manager and found to be acceptable. It was evident by the attendance records that the SBLO was utilizing [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Sikorsky does comply with FAR 52.219-9 (d)(11). DCMA finds this be acceptable.

o. FAR 52.219-9 (d) (11) (v) Briefly describe and analyze the records the firm maintains to document internal guidance and encouragement to buyers through (A) workshops, seminars, training, etc. and (B) monitoring performance to evaluate compliance with program requirements. Are they maintaining records as described in the plan? ☒ YES ☐ NO  
DESCRIBE HERE:

A copy of the training was provided to the DCMA Program Manager for review. The training was found to be complete and accurate to address the buyer's role in the Small Business and Purchasing process.

[REDACTED] This was confirmed by the SBLO and verified by the DCMA Program Manager. [REDACTED] This results in [REDACTED], which is in line with [REDACTED] and SAC Handbook adequate. Sikorsky is in compliance with FAR 52.219-9(d)(11)(v). DCMA finds this to be acceptable.

- p. FAR 52.219-9 (d) (11) (vi) Briefly describe and analyze the methodology the firm uses, on a contract-by-contract basis, to record support award data, including the name, address, and business size of each subcontractor. Contractors having commercial plans need not comply with this requirement. Are they maintaining records as described in the plan?  
☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

[REDACTED] It should be noted that the system upgrade with the SAP system during the 3<sup>rd</sup> quarter did have an effect on the SSR submitted in October 2013. During the system upgrade the 4<sup>th</sup> quarter was not able to accurately differentiate small businesses subcategories which resulted in the miscalculation of the supporting figures in the SSR. During the review validation of HUBZone was demonstrated by the SBLO through www.sam.gov and the Small Business Dynamic System.

Fourteen Sample purchase order were requested and provided for review to verify Small Business categories. All fourteen were found to be correctly categorized. See Exhibit 1. Sikorsky does comply with FAR 52.219-9 (d)(11)(vi). DCMA finds this be acceptable.

- q. FAR 52.219-9 (e) (1) Briefly describe and analyze the methodology utilized by the firm to assist small businesses by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns. Are they adhering to the method described in the plan? ☒ YES ☐ NO  
 DESCRIBE HERE:

[REDACTED] However, there were no examples during FY13 for the DCMA Program Manager to review.

[REDACTED]  
 Sikorsky does comply with FAR 52.219-9 (e)(1). DCMA finds this be acceptable.



- r. FAR 52.219-9 (e) (2) Briefly describe and analyze the methodology utilized by the firm to provide adequate and timely consideration of small businesses in all "make-or-buy" decisions. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

[REDACTED]

[REDACTED]. In 2013 [REDACTED] did not negatively impact Small Business and [REDACTED]. The DCMA program Manager reviewed several examples for verification purposes. DCMA finds this to be in compliance with FAR 52.219-9 (e) (2). DCMA finds this to be acceptable.

- s. FAR 52.219-9 (e) (3) Briefly describe and analyze the methodology utilized by the firm to counsel and discuss subcontracting opportunities with small businesses. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

[REDACTED]

[REDACTED] The documents were analyzed and found to be acceptable as drafted. SAC has provided the methodology required to track counseling and discussions of subcontracting opportunities with small businesses. DCMA finds this to be in compliance with FAR 52.219-9 (e) (3). DCMA finds this to be acceptable.

- t. FAR 52.219-9 (e) (4) Briefly describe and analyze the methodology utilized by the firm to provide notice to subcontractors concerning penalties and remedies for misrepresentations of business status as a small business for the purpose of obtaining a subcontract. Is the firm adhering to the method described in the plan? ☒ YES ☐ NO DESCRIBE HERE:

[REDACTED]

The DCMA Program Manager reviewed the Sikorsky U.S. Government Provisions



**FAR 52.219-9(d)(11)(iii)**

<u>Size</u>	<u>P.O. #</u>	<u>Date</u>	<u>Vendor Name</u>	<u>\$ Amount</u>	<u>Item Procured</u>	<u>Reason Code</u>	<u>Remarks</u>
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[illegible]

SAMPLES OF P.O. TO SMALL BUSINESS TO VERIFY CERTIFICATIONFAR 52.219-9(e)(4i)SizeP.O. #DateVendor Name\$ AmountItem ProcuredSys ShowsSelf-Certification Shows

**REASON CODES FOR SB/SDB/WOSB/HUBZone/SDVOSB NOT SELECTED/SOLICITED: (1) SOLE SOURCE / (2) SINGLE SOURCE / (3) SOURCE CONTROLLED DRAWING / (4) CUSTOMER DIRECTED / (5) NO KNOWN SB SOURCE / (6) SB SOLICITED, NOT SELECTED**

**PART IV – SUPPLEMENTAL DATA  
VALIDATION OF INFORMATION IN THIS PART MAY BE USED TO JUSTIFY HIGHER RATINGS**

1. HAS A COMPANY-WIDE SB POLICY STATEMENT BEEN ISSUED BY CURRENT SENIOR MANAGEMENT AND DISSEMINATED THROUGHOUT THE COMPANY?

☒ YES. Issued By: [REDACTED] Title: [REDACTED] Date: [REDACTED]

☐ NO. COMMENTS:

2. SBLO APPOINTMENT/AUTHORITY PLACEMENT IN THE ORGANIZATION:

- a. HAS THE SBLO BEEN FORMALLY APPOINTED BY SENIOR LEVEL MANAGEMENT?

☒ YES. Where are the duties and responsibilities defined?

Mr. Francisco Vasquez has been officially appointed the Division, SBLO since January 10, 2012.

[REDACTED]

☐ NO. COMMENTS:

- b. IS THE SBLO APPOINTED AT AN APPROPRIATE LEVEL TO EFFECTIVELY ADMINISTER THE PROGRAM?

☒ YES. DESCRIBE:

[REDACTED]

☐ NO. COMMENTS

- c. TO WHOM DOES THE SBLO REPORT? Name: [REDACTED] Title: [REDACTED]

- d. SBLO IS A: ☐ Corporate ☒ Division

[REDACTED]

- e. IS THERE AN ORGANIZATION CHART THAT DISPLAYS THE POSITION OF THE SBLO WITHIN THE ORGANIZATION?

☒ YES. See below.

☐ NO. COMMENTS:



**Sikorsky Aircraft Corporation  
Organization Structure**



**3. MONITORING SB PROGRAM PERFORMANCE AND REQUIREMENTS:**

- a. ARE SENIOR MANAGEMENT AND STAFF BRIEFED REGULARLY ON ACHIEVEMENT AND/OR PROGRAM DEFICIENCIES?

☒ YES. COMMENTS:

[REDACTED]

☐ NO. COMMENTS:

- b. WHAT DOES CONTRACTOR DO TO IMPROVE OVERALL PROGRAM PERFORMANCE IF OVERALL PROGRAM GOALS ARE NOT BEING MET? (*Identify any Corrective Action Plan(s) implemented*)

[REDACTED]. These allow the responsible stake holder to adapt strategies to mitigate risk in not meeting the goals.

**4. SUPPLEMENTAL INFORMATION**

- a. Discuss the firm's use of strategic sourcing teams or other groups within the firm, that may assist the SBLO in the development of business subcontracting sources and the goal setting process. (If so, define its role in goal development and its role during plan performance). DESCRIBE:

[REDACTED]

- b. Discuss any successes the firm has made in subcontracting opportunities, those which were normally awarded to a large business, that have been redirected to a small business. DESCRIBE:

Sikorsky has made an effort to increase subcontracting opportunities, those which were normally awarded to a large business, that have been redirected to a small business, for example, [REDACTED].

Through this action and combination of focusing on increasing subcontracting opportunities to [REDACTED] they were able to increase their subcontracting with this particular vendor [REDACTED].

[REDACTED]

[REDACTED] is a continued success story from FY12 where, [REDACTED]

- c. Discuss any procurement actions the firm may have reserved for small business. DESCRIBE:

[REDACTED]

- d. Discuss the firm's use of Corporate, Blanket and Long Term Agreements and how they may affect small business dollars. DESCRIBE:

[REDACTED]

- e. Discuss the extent of use and the firm's internal written guidance for credit card purchases. DESCRIBE:

[REDACTED].

- f. Discuss the firm's use of the internet or web-site as tools to advertise its ongoing and future procurement requirements. DESCRIBE:

[REDACTED]

- g. Discuss the firm's use of Mentor/Protégé agreements to increase small business subcontracting opportunities. If the firm is not participating in the Mentor Protégé program, are they considering participating in the program? DESCRIBE:

[REDACTED]

- h. Discuss the firm's initiatives/accomplishments made to ensure more small businesses are able to compete in more "high-tech" procurements. DESCRIBE:

[REDACTED]

- i. Discuss how the firm monitors its individual subcontracting goals/plans and readjusts its internal focus in achieving goals that may be in doubt of being attained. DESCRIBE:

Not Applicable to CSP Plan Participates.

- J. Discuss any planned procurement actions, or procurement actions, or procurements addressed specifically within the subcontracting plan that had to be redirected to another business size category. DESCRIBE:

5. NOTEWORTHY ACTIVITIES TO JUSTIFY A HIGHLY SUCCESSFUL OR OUTSTANDING RATING:

REVIEW AND DISCUSS CONTRACTOR'S ACTIVITIES THAT ARE CONSIDERED NOTEWORTHY TO JUSTIFY A HIGHLY SUCCESSFUL OR OUTSTANDING.

6. ADDITIONAL REMARKS. DESCRIBE IN DETAIL HOW A CONTRACTOR HAS MET THE CRITERIA TO JUSTIFY A RATING THAT IS HIGHER THAN ACCEPTABLE.

- Sikorsky met 6 out of 6 goals.
- Sikorsky exceeded 5 out of 6 goals.
- SAC has met all of its FY13 negotiated Initiatives
- SAC met one of its FY13 negotiated Target Industries.
- [REDACTED]
- SAC has implemented new policies that drive the program to have contributory ownership of goals.

Outstanding – Describe how the contractor has had exceptional success with initiatives to assist, promote and utilize small business (SB), small disadvantaged business (SDB), women-owned small business (WOSB), HUBZone small business, veteran-owned small business (VOSB), and service-disabled VOSB (SD/VOSB). Describe how the contractor has an exemplary program that could be used as a model by other contractors in similar industries.

Highly Successful – Describe how the contractor has had significant success with initiatives to assist, promote, and utilize SB, SDB, WOSB, HUBZone small business, VOSB, and SD/VOSB. Describe how the contractor has gone above and beyond the required elements of the program. Provide documentation and stories to support such efforts.

## PART V – SUMMARY AND RECOMMENDATIONS

### 1. PROGRAM RATING:

The following rating criteria should be used to determine the contractor's rating. Note that the rating criteria are the same as SBA per the November 12, 2009 DCMA/SBA Memorandum of Understanding.

☒ **Outstanding - Exceeds** the negotiated small business goal and 2 additional category goals on 90% or more of the subcontracting plans reported for the fiscal year under review. Has exceptional success with numerous specific initiatives to assist, promote and utilize Small Business (SB), Small Disadvantaged Business (SDB), Women-Owned Small Business (WOSB), HUBZone Small Business (HUBZone), Veteran-Owned Small Business (VOSB), Service-Disabled Veteran Own Small Business (SDVQSB); Alaska Native Corporations (ANC's) and Tribal Native American concerns, except in instances where the Large Prime Contractor (LPC) can provide a reason the Commercial Marketing Representative (CMR) or DCMA representative deems justifiable as to why the LPC has not had exceptional success in those categories.

☐ **Highly Successful - Met or exceeded** the negotiated goals in three small business categories on 80% of the subcontracting plans reported for the fiscal year under review. Has moderate success with some initiatives to assist, promote and utilize SB, SDB, WOSB, HUBZone, VOSB, and SDVOSB as described above in the criteria for a rating of Outstanding. Demonstrates focused efforts to go

above and beyond the required elements of the subcontracting program and provides documentation of achievements and success stories to support such efforts. The contractor demonstrates existing policies and process that ensures 85% on-time and accurate submission of required reports in eSRS as a prime contractor and 80% on-time submission of reports from their subcontractors.

☐ **Acceptable – Always** demonstrates a good-faith effort to meet **all** of its goals on subcontracting plans reported for the fiscal year being reviewed, but falls short of thresholds to receive a rating of Highly Successful. Provides reasonable and supportable explanations why certain goals could not be achieved. Demonstrates compliance with the mandatory elements of their subcontracting plans and implementing regulations. ISRs and SSRs submitted accurately within 30 days after the end of applicable reporting periods 70% of the time.

☐ **Marginal - Deficient** in meeting key subcontracting plan elements or the contractor has failed to satisfy one or more requirements of a corrective action plan from the prior review. Fail to comply with the submission requirements in eSRS on the majority of their contracts with subcontracting plans and no evidence of flow-down to applicable subcontractors. There is evidence of corporate and/or senior management commitment to bring their subcontracting program to an acceptable level and has demonstrated a commitment to apply the necessary resources to do so. A corrective action plan is required, and the Administrative Contracting Officer(s) (ACO) and SBA CMR(s) must be notified.

☐ **Unsatisfactory – Noncompliant** with the contractual requirements of DFARS and FAR 52.219-8 and 52.219-9. Contractor's management shows little interest in bringing its program to an acceptable level or is generally uncooperative. For example, recommendations made by SBA or DCMA on previous reviews have never been implemented. A corrective action plan is required, and the ACO(s) and SBA CMR(s) must be notified

## 2. RISK RATING:

The following rating criteria should be used to determine the contractor's rating.

- ☐ **High** - High Risk is assigned when the contractor is not meeting contract negotiated and DoD goals.
- ☒ **Moderate** - Moderate Risk may be assigned when the contractor is meeting contract negotiated goals but not DoD goals.
- ☐ **Low** – Low Risk may be assigned when the contractor is meeting contract negotiated and DoD goals.

## 3. RATINGS SUMMARY, RECOMMENDATIONS, AND FOLLOW-UP OF CORRECTIVE ACTIONS(S):

- 1 "Negotiated goals" refers to the dollar and percentage goals in the approved subcontracting plan. (For rating purposes, the reviewer will compare the percentage goals to the percentage achievements.)
- 2 Examples of such initiatives include, but are not limited to, participating in a Mentor-Protégé program, performing compliance reviews at subcontractors' sites, administering a buyer incentive program, participating in trade fairs, promoting registration in the CCR, and contracting suppliers to encourage SDB and HUBZone certification.
- 3 For example, recommendations made by SBA or DCMA on previous reviews have never been implemented.

### DISCUSS:

#### Risk Rating:

Sikorsky's FY13 program risk rating is "Moderate." The "moderate" rating is assigned when a contractor is meeting negotiated goals but not DOD goals.

#### Performance Rating:

Sikorsky's Small Business Program Performance is rated "Outstanding" for FY13.

#### Follow-up of Corrective Actions:

It is recommended that Sikorsky be able to provide supporting documentation to ensure the subcontractors with applicable Small Business Plans are submitting ISRs in accordance with FAR 52.219-9 (d) (10).

**4. EXIT INTERVIEW PARTICIPANTS:****Government:**

1. Judy Collier
2. Kimberly Gaskins, DACO
3. Alexander Yip, Cost Monitor

**Contractor:**

1. Francisco Vasquez, SBLO
2. Amy Johnson, Director Supply Chain Management
3. Keith Richardson, Manager Business Process Management
4. John Palumbo, Vice President of Product Centers

**5. REVIEW STATUS:**

Indicate the status of this 640 Review. Once a review is closed, you'll need to create a new review.

☐ Open

☒ Closed

**6. NAME of SMALL BUSINESS SPECIALIST:****7. DATE:**

**SIGNATURE:** \_\_\_\_\_  
Judy A. Collier

\_\_\_\_\_  
03/07/2014



**DEFENSE CONTRACT MANAGEMENT AGENCY (DCMA)**  
**SMALL BUSINESS SUBCONTRACTING PROGRAM COMPLIANCE REVIEW**  
 In accordance with FAR 19.706 and FAR 52.219-9

**Part I – General Information**

**1.a. Contractor****Name:** Sikorsky, A Lockheed Martin Company(SIK)**Address:** 6900 Main Street**City/State/Zip:** Stratford, CT 06615-9129**CAGE(s) [Field 1 ]:** 78286**DUNS:** 835551474**1.b. Small Business Liaison Officer (SBLO) [Field 2]:****Name:** Martha Crawford**Phone:** (b) (6) Ext**E-mail:** (b) (6)**1.c. Alternate Small Business Liaison Officer (SBLO) [Field 3]:****Name:** NA**Phone:** Ext**E-mail:****2. DCMA Small Business Professional****Name:** Luz M. Vasquez**Title:** Small Business Professional**Phone:** (b) (6) Ext**E-mail:** (b) (6)**3. Administrative Contracting Officer****Name:** Kimberly Gaskins**Location:** DCMA Sikorsky**Phone:** (b) (6) Ext**E-mail:** (b) (6)**4. Small Business Administration (SBA) Representative****Name:** Sandy Liu**Phone:** (b) (6) Ext**E-mail:** (b) (6)**5. DCMA/Small Business Administration (SBA), joint review**☐ Yes ☒ No Note: always "No" unless it is an approved follow up type review.**6. Review type: On-site ☒ Virtual Review ☐****7. Period Covered by this Review****a. From:** October 1, 2015**b. To:** September 30, 2016**8.a. Date of this review:** February 22-23, 2017**b. Rating of this review:** Satisfactory**9.a. Date of last review [Field 4]:** February 22, 2016**b. Rating of last review [Field 5]:** Exceptional

**10. Department of Defense (DoD) Ratios**

a. Total annual company sales [Field 6]: [REDACTED]

b. Total annual sales for DoD [Field 7]: [REDACTED]

**11. Type of Subcontract Plan(s)**

☐ Individual Plan(s): Number of plans:

☐ Commercial Plan: Approved by:

Plan year:

☒ Comprehensive Plan: Approved by: Tatia M. Evelyn-Bellamy

Plan year: FY16

☐ Master Plan: Approved by:

Three (3) Year Period Ending:

**12. Mentor Protégé Agreements [Field 8]:**

[REDACTED]

## Part II – Contractor's Subcontracting Performance

### 1. Accuracy of Small Business Reports [Summary Subcontract Reports (SSRs) and Individual Subcontracting Reports (ISRs)]

- a. Were small business, small disadvantaged business, women-owned small business, HUBZone small business, service-disabled veteran-owned small business, and veteran-owned small business reported in accordance with FAR 52.219-8(a) on SSRs and ISRs [Field 36]? – See Exhibit I

☐ YES ☒ NO

Describe:

The FY16 SSR incorrectly reported dollars for the SB, VOSB, SDVOSB and HUBZone categories. A total of \$833,748 was incorrectly reported to the SB, VOSB and SDVOSB due to an error with the transfer data from Sikorsky's SSSI segment into Sikorsky's FY16 SSR submission. [REDACTED]. There were also \$11,076 dollars reported for a supplier with an expired HUBZone certification. The dollars reported after the contractor certification expires are disallowed. The supplier certifies at time of award that the size representations submitted are correct, the prime contractor needs to ensure that suppliers claiming HUBZone status are certified by SBA at time of award in accordance with FAR 52.219-8(d)(2)(5) and FAR 52.219-9(e)(4) which states the contractor shall confirm that a subcontractor representing itself as a HUBZone small business concern is certified by SBA as a HUBZone small business concern in accordance with 52.219-8(d)(2). DCMA request corrections of Sikorsky's FY16 SSR to reflect corrected spend for the categories mentioned above.

- b. Does the contractor correctly rely on written representations by their subcontractors regarding their status as a small business concern, a veteran-owned small business concern, a service-disabled veteran-owned small business concern, a small disadvantaged business concern, or a women-owned small business concern in accordance with FAR 52.219-8(d)(1) on SSRs and ISRs [Field 36]? – See Exhibit I ☐ YES ☒ NO

Describe:

[REDACTED]. The FAR requires that a supplier certifies its size as accurate at time of award. In the case of a HUBZone supplier the contractor shall confirm that a subcontractor representing itself as a HUBZone small business concern is certified by SBA as a HUBZone small business concern by accessing the System for Award Management database or by contacting the SBA at time of award. The purchase order sample found HUBZone suppliers are not being validated at time of award and found one instance in which dollars were reported against the HUBZone category for a supplier with an expired HUBZone certification (\$11,076) at time of award. DCMA requested a roll up of orders issued for this supplier after the certification expired until the end of the reporting period (June through Sept 30, 2016) as those would have been incorrectly reported in their FY16 SSR but there were no other purchase

- c. Does the contractor adequately include credit card purchases on SSRs in accordance with FAR 52.219-9(l)(2)(i)(A) or FAR 52.219-9(2)(ii)(A) and Individual Subcontracting Reports (ISRs) in accordance with FAR 52.219-9(l)(1)(i) [Field 11]? ☐ YES ☒ NO

Describe:

[REDACTED]



## Part II – Contractor's Subcontracting Performance

### 1. Accuracy of Small Business Reports [Summary Subcontract Reports (SSRs) and Individual Subcontracting Reports (ISRs)]

- a. Were small business, small disadvantaged business, women-owned small business, HUBZone small business, service-disabled veteran-owned small business, and veteran-owned small business reported in accordance with FAR 52.219-8(a) on SSRs and ISRs [Field 36]? – See Exhibit I

☐ YES ☒ NO

Describe:

There were some incorrectly reported dollars for the SB, VOSB, SDVOSB and HUBZone categories. A total of \$200,740 was incorrectly reported to the SB, VOSB and SDVOSB due to an error with the transfer data from Sikorsky's SSSI segment into Sikorsky's FY16 SSR submission. There were also \$11,076 dollars reported for a supplier with an expired HUBZone certification. The dollars reported after the contractor certification expires are disallowed. The supplier certifies at time of award that the size representations submitted are correct, the prime contractor needs to ensure that suppliers claiming HUBZone status are certified by SBA at time of award in accordance with FAR 52.219-8(d)(2)(5) and FAR 52.219-9(e)(4) which states the contractor shall confirm that a subcontractor representing itself as a HUBZone small business concern is certified by SBA as a HUBZone small business concern in accordance with 52.219-8(d)(2). DCMA request corrections of Sikorsky's FY16 SSR to reflect corrected spend for the categories mentioned above.

- b. Does the contractor correctly rely on written representations by their subcontractors regarding their status as a small business concern, a veteran-owned small business concern, a service-disabled veteran-owned small business concern, a small disadvantaged business concern, or a women-owned small business concern in accordance with FAR 52.219-8(d)(1) on SSRs and ISRs [Field 36]? – See Exhibit I ☐ YES ☒ NO

Describe:

The FAR requires that a supplier certifies its size as accurate at time of award. In the case of a HUBZone supplier the contractor shall confirm that a subcontractor representing itself as a HUBZone small business concern is certified by SBA as a HUBZone small business concern by accessing the System for Award Management database or by contacting the SBA at time of award. The purchase order sample found HUBZone suppliers are not being validated at time of award and found one instance in which dollars were reported against the HUBZone category for a supplier with an expired HUBZone certification (\$11,076) at time of award. DCMA requested a roll up of orders issued for this supplier after the certification expired until the end of the reporting period (June through Sept 30, 2016) as those would have been incorrectly reported in their FY16 SSR but there were no other purchase

- c. Does the contractor adequately include credit card purchases on SSRs in accordance with FAR 52.219-9(l)(2)(i)(A) or FAR 52.219-9(2)(ii)(A) and Individual Subcontracting Reports (ISRs) in accordance with FAR 52.219-9(l)(1)(i) [Field 11]?

☐ YES ☒ NO

Describe:



## Part II – Contractor's Subcontracting Performance

### 1. Accuracy of Small Business Reports [Summary Subcontract Reports (SSRs) and Individual Subcontracting Reports (ISRs)]

- a. Were small business, small disadvantaged business, women-owned small business, HUBZone small business, service-disabled veteran-owned small business, and veteran-owned small business reported in accordance with FAR 52.219-8(a) on SSRs and ISRs [Field 36]? – See Exhibit I

☐ YES ☒ NO

Describe:

Th FY16 SSR incorrectly reported dollars for the SB, VOSB, SDVOSB and HUBZone categories. A total of \$833,748 was incorrectly reported to the SB, VOSB and SDVOSB due to an error with the transfer data from Sikorsky's SSSI segment into Sikorsky's FY16 SSR submission [REDACTED]. There were also \$11,076 dollars reported for a supplier with an expired HUBZone certification. The dollars reported after the contractor certification expires are disallowed. The supplier certifies at time of award that the size representations submitted are correct, the prime contractor needs to ensure that suppliers claiming HUBZone status are certified by SBA at time of award in accordance with FAR 52.219-8(d)(2)(5) and FAR 52.219-9(e)(4) which states the contractor shall confirm that a subcontractor representing itself as a HUBZone small business concern is certified by SBA as a HUBZone small business concern in accordance with 52.219-8(d)(2). DCMA request corrections of Sikorsky's FY16 SSR to reflect corrected spend for the categories mentioned above.

- b. Does the contractor correctly rely on written representations by their subcontractors regarding their status as a small business concern, a veteran-owned small business concern, a service-disabled veteran-owned small business concern, a small disadvantaged business concern, or a women-owned small business concern in accordance with FAR 52.219-8(d)(1) on SSRs and ISRs [Field 36]? – See Exhibit I ☐ YES ☒ NO

Describe:

the case of a HUBZone supplier the contractor shall confirm that a subcontractor representing itself as a HUBZone small business concern is certified by SBA as a HUBZone small business concern by accessing the System for Award Management database or by contacting the SBA at time of award. The purchase order sample found HUBZone suppliers are not being validated at time of award and found one instance in which dollars were reported against the HUBZone category for a supplier with an expired HUBZone certification (\$11,076) at time of award. DCMA requested a roll up of orders issued for this supplier after the certification expired until the end of the reporting period (June through Sept 30, 2016) as those would have been incorrectly reported in their FY16 SSR but there were no other purchase orders issued for that period. Your SSR report needs to be revised, a total of \$11,076 is disallowed. The contractor failed to meet the requirements of FAR 52.219-9(e)(4) and FAR 52.219-8(d)(2).

- c. Does the contractor adequately include credit card purchases on SSRs in accordance with FAR 52.219-9(l)(2)(i)(A) or FAR 52.219-9(2)(ii)(A) and Individual Subcontracting Reports (ISRs) in accordance with FAR 52.219-9(l)(1)(i) [Field 11]? ☐ YES ☒ NO

☐ YES ☒ NO

Describe:

[REDACTED]



**2. Overall subcontracting performance – SSR submission FAR 52.219-9(l)(2)**

- a. Were SSRs submitted accurately in accordance with the FAR and SSR instructions at Electronic Subcontracting Reporting System (eSRS.gov) [Field 9]? ☐ YES ☒ NO**  
**Describe:**

There were dollars allocated in the SSR report for misclassified suppliers, which makes the report inaccurate. The contractor acknowledged the errors and provided satisfactory explanations to account for the errors. Further, there were indirect allocations added to the SSR report for purchases of direct material prior to an award of a contract that the contractor could not support nor could they tie up to a DoD award/contract. The contractor was not able to validate the SSR when requested by DCMA.

- (1) Were SSRs submitted under individual contract plans ☐ YES ☒ NO** If no, skip to question (2)

- (a) FAR 52.219-9(l)(2)(i)(A) Does the SSR encompass all subcontracting under prime contracts and subcontracts with the awarding agency, regardless of the dollar value of the subcontracts? ☐ YES ☐ NO**
- (b) FAR 52.219-9(l)(2)(i)(A)(C) Did the contractor submit a separate SSR to each executive agency covering only that agency's contracts, provided at least one of that agency's contracts is over \$650,000 prior to 1 October 2015) \$700,000 (after 1 October 2015) (over \$1.5 million for construction of a public facility) and contains a subcontracting plan? ☐ YES ☐ NO**
- (c) Is the SSR submitted annually, within thirty days (30) after the end of the Government's fiscal year [September 30] in accordance with FAR 52.219-9(l)(2)(i)(A)(D) inclusive of DoD Deviation 2013-O0014? ☐ YES ☐ NO**
- (d) FAR 52.219-9(l)(2)(i)(A)(E) Were subcontract awards that were related to work for more than one executive agency appropriately allocated on the SSR? ☐ YES ☐ NO**

- (2) Commercial Plan ☐ YES ☒ NO** If no, skip to Question 3.

- (a) Does the commercial SSR include all subcontract awards under the commercial plan in effect during the Government's fiscal year in accordance with FAR 52.219-9(l)(2)(ii)(A)? ☐ YES ☐ NO**
- (b) Is the commercial SSR submitted annually, within thirty days (30) after the end of the Government's fiscal year in accordance with FAR 52.219-9(l)(2)(ii)(B)? ☐ YES ☐ NO**
- (c) Has the contractor specified the percentage of dollars attributable to each agency from which contracts for commercial items were received on the SSR in accordance with FAR 52.219-9(l)(2)(ii)(C)? ☐ YES ☐ NO**

- (3) Is the CEO (the most the Senior Executive in the organization) named on SSR [Block 13 of SSR]? ☒ YES ☐ NO**

- (4) Did the CEO sign and keep the signed SSR on file? ☒ YES ☐ NO**

- b. Perform trend analysis of historical small business goal achievements (*last 5 years, if available*) from eSRS. Describe the underlying cause of trends, positive or negative. See Exhibit II.

Describe:

. The contractor's supplier base seems to be stable.

3. Individual Subcontracting Report (ISRs) performance– (Not applicable to Commercial or Comprehensive Plans) FAR 52.219-9(I)(1)

- a. Were ISRs submitted accurately in accordance the FAR 52.219-9(I)(1) and ISR instructions at eSRS.gov [Field 11]:? ☐ YES ☐ NO

Describe:

- (1) FAR 52.219-9(I)(1)(i): During contract performance, were ISRs submitted within thirty days of March 31 and September 30? Exhibit III ☐ YES ☐ NO
- (2) FAR 52.219-9(I)(1)(i): Were final ISRs submitted for each contract within thirty days of contract completion? ☐ YES ☐ NO
- (3) FAR 52.219-9(I)(1)(ii): If options were included on the requirement, was the dollar goal inserted on the ISR a sum of the base period through the current option? ☐ YES ☐ NO
- (4) FAR 52.219-9(I)(1)(iii): Did the contractor acknowledge receipt or reject the ISRs from the subcontractor(s)? See Exhibit ☐ YES ☐ NO  
☐ NOT APPLICABLE

- b. Perform analysis of all regular and final individual subcontracting reports (ISRs). Including analysis of ISR's, do the contractor's records demonstrate a good faith effort in accordance with FAR 19.701 as determined by FAR 19.705-7(d)?

☐ YES ☐ NO - See Exhibit III.

### Part III – Contractor's Small Business Program

#### 1. Review of Small Business Program in accordance with FAR 52.219-9

a. FAR 52.219-9(d)(1) Does the contractor express goals in terms of percentage of total planned subcontracting dollars for each small business category, in all plans?

☒ YES ☐ NO

b. FAR 52.219-9(d)(2) Are there statements of total dollars planned to be subcontracted for each small business category in all plans? ☒ YES ☐ NO

c. FAR 52.219-9(d)(3) Is there a description of the principal types of supplies and services to be subcontracted for each small business category? ☒ YES ☐ NO

d. FAR 52.219-9(d)(4) Briefly describe the methodology used by the contractor to develop subcontracting goals. Is the contractor adhering to the method described in the plans to develop subcontracting goals? ☒ YES ☐ NO

DESCRIBE:

[REDACTED]. This methodology has been found to be acceptable.

e. FAR 52.219-9(d)(5) Briefly describe the methodology utilized by the contractor to identify potential sources for solicitation purposes. Is the contractor adhering to the method described in the approved small business subcontracting plans? ☒ YES ☐ NO

DESCRIBE:

Sikorsky correctly identifies in their FY16 CSP a listing of potential sources they utilize to identify potential suppliers but records are not being maintained for all sources. DCMA could only verify Sikorsky's use of their internal directory of suppliers [REDACTED] as valid sources used in FY16. Sikorsky does have a method of identifying new sources as such it is found to be compliant with FAR 52.219-9(d)(5).

- f. FAR 52.219-9(d)(6) Are indirect costs included in establishing subcontracting goals? Briefly describe and analyze the methodology utilized by the contractor to determine share of indirect costs for small business, veteran-owned small business concerns, service-disabled veteran-owned small business concerns, HUBZone small business concerns, small disadvantaged business concerns, and women-owned small business concerns. ☒ YES ☐ NO ☐ NOT APPLICABLE

If applicable, is the contractor adhering to the method described in the small business subcontracting plans? ☒ YES ☐ NO

DESCRIBE:

[REDACTED] an appropriate allocation is added to each socio-economic category.

[REDACTED] The contractors subcontracting goals and its actual total subcontracting dollars have been historically a close match. The contractor was not able to tie the indirect allocations claimed in their SSR report to a specific DoD contract as their process has not been enhanced to capture the end-customer whether it goes to a DoD aircraft or not. The contractor is requested to develop a methodology to track their direct material parts spend purchased prior to award to the end-customer. Otherwise, the contractor is not allowed to claim these dollars in their FY18 CSP plan as DoD dollars when they cannot support it.

- g. FAR 52.219-9(d)(7) Is the name of individual employed by the contractor who administers the subcontracting program included in the plans, with a description of the duties?

☒ YES ☐ NO Are they fulfilling the small business duties as described in the plans?

☐ YES ☒ NO

DESCRIBE:

Martha Crawford is correctly identified on the FY16 CSP as Sikorsky's SBLO. [REDACTED]

[REDACTED] A review of the SBLO duties listed under page 12 of the FY16 CSP finds that the SBLO is fulfilling all her duties with the exception of the review and acceptance of ISRs in the eSRS system. The contractor understands this requirement and

[REDACTED] DCMA will monitor the progress of the implementation of this tool monthly.

- h. FAR 52.219-9(d)(8) Briefly describe the efforts by the contractor to ensure small business concerns have an equitable opportunity to compete for subcontracts. Is the contractor adhering to the method described in the plans to assure equitable subcontracting opportunities exist for small business? ☒ YES ☐ NO

DESCRIBE:

Sikorsky's procedures were reviewed and they provide instructions to buyers to ensure small business concerns are afforded equitable opportunities. [REDACTED]

[REDACTED] The company also has a strong Supplier Development Training Program. Sikorsky's efforts are considered adequate.

- i. FAR 52.219-9(d)(9)

(1) Are there assurances that the offeror will include the clause FAR 52.219-8 "Utilization of Small Business Concerns" in all subcontracts that offer further subcontracting opportunities? ☒ YES ☐ NO

Is the contractor adhering to this assurance? ☒ YES ☐ NO See Exhibit I

(2) Is FAR 52.219-9 included in subcontracts over \$650,000 (prior to 1 October 2015) \$700,000 (after 1 October 2015)(\$1.5 million for construction of any public facility with further subcontracting possibilities) [Field 35]. ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO ☐ NOT APPLICABLE  
See Exhibit I

(3) Are there subcontracting plans in place with their subcontractors who have subcontracts over \$650,000 (prior to 1 October 2015) \$700,000 (after 1 October 2015) (\$1.5 million for construction of any public facility with further subcontracting possibilities) with large businesses? ☒ YES ☐ NO  
Is the contractor adhering to this assurance [Field 35]? ☒ YES ☐ NO  
☐ NOT APPLICABLE See Exhibit I

j. FAR 52.219-9(d)(10) Are there assurances that the offeror will –

(1) Cooperate in studies or surveys as may be required in accordance with FAR 52.219-9(d)(10)(i) and FAR 52.219-8(c)? ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO

(2) Submit periodic reports to determine extent of compliance to plans in accordance with FAR 52.219-9(d)(10)(ii)?  
☒ YES ☐ NO Is the contractor adhering to this assurance? ☒ YES ☐ NO

(3) Include assurances the contractor will submit Individual Subcontracting Reports (ISRs) and/or Summary Subcontract Reports (SSRs) in accordance with FAR 52.219-9(d)(10)(iii)? ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO

(4) Ensure that its subcontractors agree to submit Individual Subcontracting Reports (ISRs) and/or Summary Subcontract Reports (SSRs) in accordance with FAR 52.219-9(d)(10)(iii)? ☐ YES ☒ NO  
Is the contractor adhering to this assurance? ☐ YES ☒ NO  
☐ NOT APPLICABLE See Exhibit I

(5) Provide its prime contract number, its DUNS number, and the e-mail address of the offeror's official responsible for acknowledging receipt of or rejecting the ISRs, to all first-tier subcontractors with subcontracting plans so they can enter this information into the eSRS when submitting their ISRs in accordance with FAR 52.219-9(d)(10)(v)? ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO  
☐ NOT APPLICABLE

(6) Require that each subcontractor with a subcontracting plan provide the prime contract number, its own DUNS number, and the e-mail address of the subcontractor's official responsible for acknowledging receipt of or rejecting the ISRs, to its subcontractors with subcontracting plans in accordance with FAR 52.219-9(d)(10)(vi)? ☒ YES ☐ NO  
Is the contractor adhering to this assurance? ☒ YES ☐ NO ☐ NOT APPLICABLE