

CLIENT ALERT

SBA Proposes Fundamental Revision to Subcontract Reporting

Oct.08.2015

On October 6, 2015, the SBA issued a proposed rule to change the way prime contractors report how they complied with individual subcontracting plan goals by allowing primes to receive credit for awards made at any subcontracting tier (instead of first-tier only). As part of this proposed change, primes would have to incorporate the subcontracting plan goals of their lower-tier subcontractors into their individual subcontracting plans and would become responsible for ensuring that subcontractors adopt and comply with their plans.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

Amy Laderberg O'Sullivan

Partner – Washington, D.C.

Phone: +1 202.624.2563

Email: aosullivan@crowell.com

Olivia Lynch

Counsel – Washington, D.C.

Phone: +1 202.624.2654

Email: olynch@crowell.com