

CLIENT ALERT

SBA's July 2013 Small Business Subcontracting Revisions Finally Implemented in the FAR

Jul.21.2016

On July 14, 2016, DoD, GSA, and NASA published a final rule implementing numerous updates to the FAR to account for regulatory changes affecting the small business subcontracting requirements made by the SBA dating back to July 2013. These changes, which become effective November 1, 2016, range from requiring prime contractors to assign NAICS codes to subcontracts, to providing contracting officers the discretion to establish subcontracting goals at the order level of IDIQ contracts, to protecting subcontractors' ability to discuss payment or utilization matters with the contracting officer.

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