

Issue: April 30, 2020 due date for Individual Subcontracting Reports

Prime contractors are required to submit data twice a year (mid-year and end of fiscal year) as part of their subcontracting compliance requirements. Currently the due date for the mid-year Individual Subcontracting Reports (ISRs) is April 30, 2020.

Prime contractors are also required to submit an ISR within 30 days of the completion of a contract.

COVID-19 has impacted business operations for many large prime contractors with staff unable to access reporting systems and database-systems remotely and many employees are in part-time or furlough status. Under these circumstances prime contractors may need relief to meet regulatory reporting deadlines.

Proposed Change:

SBA is proposing to extend the reporting deadline for timely submission by prime contractors. SBA is extending the due date of April 30, 2020 for the midyear ISR reporting period, to June 30, 2020. SBA is also extending the deadline for firms that have recently completed contracts or that will complete contracts in the near future. Extending the reporting period will provide agencies and contractors additional time to put processes in place to make data submissions.

Impact of Change:

This policy change will provide relief to contractors that are able to make the necessary adjustments in technology to comply with federal reporting requirements. Contractors that are still unable to report will have the opportunity to report full year achievements during the September reporting period. **How will this change be communicated?**

The extension notice will be sent to those on our SBPAC listserv, distributed by Civilian Agency Acquisition Counsel and will be provided Office of Federal Procurement Policy. It will also be sent to all government and business personnel with a valid email in eSRS. It will be shared with our resource partners and posted on the SBA's Subcontracting Webpage and SubNet system. SBA's social media platforms will also be utilized to inform the community impacted.

How much time is needed to implement the change?

- **Draft Extension Notice:** Is already been prepared
- **Management Approval of Extension Notice:** 2days
- **Implementation of Memorandum:** Implemented immediately upon publishing no action otherwise is required.
- **Communication of Extension Notice:** The Guidance will be provided immediately

Is there any financial and/or liability impact? The deadline extension will not impose any financial or liability.