Policy Title: **Small Business Program**  
Category: Administration  
Policy ID: 5-6010-005  
☐ New Policy  
☐ Revision of Existing Policy  
Date Submitted: March 27, 2018  
Policy Proponent/Owner: Vice President for University Operations  
Contact(s): Linda Meserve, Director Procurement Services 970-491-6611  

**POLICY DESCRIPTION AND BASIS**

Federal law requires that recipients of certain federal contracts that are subject to the FAR (Federal Acquisition Regulations) provide maximum practicable opportunities to small business concerns in their acquisitions. (FAR 19.702). The term “small business concerns” includes small business (SB), veteran-owned small business (VOSB), service-disabled veteran-owned small business (SDVOSB), HUBZone (HZ) small business, small disadvantaged business (SDB), and woman-owned small business (WOSB) concerns, as well as historically black colleges or universities or minority institutions (HBCU/MIs). In accordance with the Federal Acquisition Regulations requirement at 52.219-8, “Utilization of Small Business Concerns” and 52.219-9, “Small Business Subcontracting Plan,” this policy will require that Procurement Services, working with CSU departments receiving federal contracts that are subject to the FAR, utilize best efforts to subcontract with, and make acquisitions from, qualifying small business concerns; and that for each contract funded by a Federal agency that exceeds the regulatory threshold (currently $700,000, or $1.5 million for construction of a public facility), a Subcontracting Plan will be created, negotiated and administered in accordance with federal contract requirements.

Adoption of a formal policy reinforces CSU’s commitment to complying with these federal requirements, and supports diversity by engaging small and disadvantaged businesses in University activities. It is also required as a matter of compliance that CSU have an official small business program policy and procedures.
REQUIRED RESOURCES

One FTE has moved from a purchasing agent position into the CSU Small Business Program effective March 1, 2018. Resources needed to support this program have yet to be determined.

ANTICIPATED IMPACTS

This policy reflects current law that impacts all departments and research personnel receiving federal contracts, and formalizes existing requirements. As such, there are no new impacts as a result of this policy; however, the policy will reinforce these existing requirements, and compliance will be enforced by Procurement Services.

POLICY DEVELOPMENT

Policy development will be supported by representatives from Procurement Services and the Office of Sponsored Programs.

STAKEHOLDER INPUT

Stakeholder input will be solicited from college business officers from the Campus Administrative Advisory Group (CAAG), Campus Administrative Processing Advisory Council (CAPAC), Research Administrators’ Campus Network (RAMAround), and others who may be identified during policy development.

ADMINISTRATIVE/MANAGEMENT/ASSESSMENT

The policy will be administered on an ongoing basis by Procurement Services with assistance from the Office of Sponsored Programs and Business & Financial Services.

PROCEDURES, GUIDELINES AND FORMS

Procurement Services will be responsible for developing the necessary procedures, guidelines and forms during policy implementation. These will be published in a CSU Small Business Program Policy & Procedures manual.

INTERNAL CONTROLS

The Office of Sponsored Programs is responsible for assuring that contract information is entered into Kuali Research. This information indicates to Procurement which contracts require reporting.

Business and Financial Services reviews requests for new vendors to be created in Kuali Financial System (KFS). These requests require a W9 and vendor self-certification form,
where a small business can certify their size and status as a small business concern. This information will be reflected in the KFS vendor profile, under Supplier Diversity.

Procurement is responsible for tracking project expenditures and filing bi-annual reports with the federal government. These reports will indicate plan performance and compliance with this policy.

REVIEW AND APPROVAL BY THE PRESIDENT'S CABINET:

☐ APPROVED TO PROCEED TO POLICY DEVELOPMENT

☐ NOT APPROVED

☐ MORE INFORMATION NEEDED:

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By:  signed by Lynn Johnson, VPUO/original signature on file

Lynn Johnson
Vice President for University Operations

Date:     March 27, 2018

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