



**CONSUMER FINANCIAL PROTECTION BUREAU
WASHINGTON, DC 20552**

Date: July 19, 2013

To: Interested Vendors

Subject: Integrating Financial Coaching into Service Delivery for Transitioning Veterans and Economically Vulnerable Consumers

Attached is a draft solicitation for the *Integrating Financial Coaching into Service Delivery for Transitioning Veterans and Economically Vulnerable Consumers* project, which seeks to provide financial coaching services to transitioning veterans and economically vulnerable consumers to help them proactively take control of their finances at crucial moments in their lives.

To ensure this project is executed in the most effective manner possible, the Consumer Financial Protection Bureau (CFPB) is seeking industry input by (1) issuing a draft solicitation for vendors' review and comment, and (2) holding a pre-solicitation vendor conference to obtain further information and encourage vendor participation. In an effort to keep the focus on the project at this stage, the attached draft solicitation includes, among other sections, the draft Statement of Work (SOW) and Evaluation Criteria. The draft solicitation is intended to provide an opportunity for expert vendor feedback into the tentative design of the proposed project and the supporting procurement. Your questions and input will be the basis of a pre-solicitation vendor conference the CFPB anticipates holding on August 28, 2013 in our Washington DC headquarters (see further details below). The conference is designed to 1) clarify the intent of the project; 2) respond to vendor questions; and 3) provide interested parties an additional avenue to explore potential partnering opportunities to best fulfill the needs of the project. If you cannot attend the conference in person, you may participate via a telephonic conference. The CFPB will be requesting vendor feedback and questions prior to this conference, as detailed below.

1. Draft Solicitation Response Submission Instructions

Please utilize the CVENT system at [this site](#) to submit the following to the CFPB no later than August 9, 2013:

- a) Questions you have about this draft solicitation;
- b) Input and/or recommendations to contribute to the effectiveness of the project and the supporting procurement (e.g., points for clarification, realistic timelines, vendor responsiveness requirements; additional or differing deliverables, efficient contract cost structure, etcetera);

- c) Whether you plan to participate in the vendor conference, and if so, if you will be attending in person or listening in via phone; and
- d) Whether you prefer not to have your contact information shared with other interested vendors.

Due to the complex nature of this project and the diverse populations to be served, vendors may want to consider partnering to achieve the required tasks and criteria related to expertise and experience. The CFPB plans to make the vendor contact information public via a participants list; this will not include vendors that have stated their preference to not have their information shared. The CFPB intends to award one Indefinite Delivery/Indefinite Quantity (IDIQ) contract as a result of the future solicitation, but will reserve the right to issue multiple awards or no awards.

2. Pre-solicitation Vendor Conference Information

The CFPB currently anticipates holding a pre-solicitation vendor conference on August 28, 2013 in our Washington DC headquarters (1700 G Street NW, Washington DC 20552), from 8:30 a.m. – 12:00 p.m. Eastern Time. Interested vendors are encouraged to participate in-person, if possible, or by telephone.

To register for this event, please visit [this site](#) and complete your registration and submit any questions or comments by no later than August 9, 2013. Only **registered** individuals will be able to participate in the conference.

Should you have any questions, you may contact Nicholas Olson (Nicholas.Olson@cfpb.gov) or Matthew Chmielewski (Matthew.Chmielewski@cfpb.gov). We thank you in advance for your input and participation!

Attachment: Draft Solicitation

Draft Solicitation

Integrating Financial Coaching into Service Delivery for Transitioning Veterans and Economically Vulnerable Consumers

Consumer Financial Protection Bureau
Office of Servicemember Affairs
Office of Financial Empowerment

7/19/13

1.0 BACKGROUND

The Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (“Dodd-Frank Act”), Pub. L. 111-203, established the Consumer Financial Protection Bureau (“CFPB” or the “Bureau”) to regulate the offering and provision of consumer products or services under federal consumer financial laws. Consistent with the purposes of the Dodd-Frank Act, the CFPB’s mission is to establish and enforce clear, consistent rules for the financial marketplace, protect American families from unfair financial practices, and develop and implement a strategy to improve the financial literacy of consumers. For additional background on the CFPB, please see <http://www.consumerfinance.gov/the-bureau/>.

The Dodd-Frank Act assigns the CFPB’s Office of Servicemember Affairs the responsibility to educate and empower servicemembers and their families to make better informed decisions regarding consumer financial products and services. Similarly, the CFPB’s Office of Financial Empowerment seeks to meet the Bureau’s statutory mandate to “provid[e] information, guidance, and technical assistance regarding the offering and provision of consumer financial products and services to traditionally underserved consumers and communities.”¹

Financial aspects of a servicemember’s transition to veteran status and civilian life are often overlooked, although they frequently determine the success of the process. Additionally, the most economically vulnerable consumers, who are part of the “traditionally underserved consumers and communities,” are often the hardest to reach and the hardest to serve. These situations often necessitate in-person, individualized guidance delivered at a trusted, convenient location.

This project seeks to provide financial coaching services to transitioning veterans and economically vulnerable consumers to help them proactively take control of their finances at crucial moments in their lives. Some of the specific challenges faced by these populations are outlined below.

Challenges specific to transitioning veterans:

- Adapting to the financial aspects of civilian life, e.g. taxes, insurance, retirement plans;

¹ 12 U.S.C. § 5493.

- Assessing compensation needs from potential new employment to meet their new situations;
- Needing assistance with the use of benefit monies resulting from service-related conditions;
- Not having a trusted source for financial information who can “speak military” and understand the unique needs of military families;
- Lacking experience in money management as they transition from service;
- Needing advice to alter or adjust transition plans and adapt the transition budget after discharge.

Challenges specific to low-income and economically vulnerable consumers:

- 49.1 million people live below the poverty line.²
- 51 million people have incomes less than 50 percent above the poverty line and are considered the “near poor.”³
- Approximately 50 million have thin or no credit files.⁴
- 43.1% of Americans are liquid-asset-poor, defined as households without sufficient liquid assets to subsist at the poverty level for three months in the absence of income.⁵
- 8.2% of US households are unbanked. Approximately 17 million adults live in unbanked households.⁶
- 20.1 percent of US households are underbanked. This represents one in five households, or 24 million households with 51 million adults.⁷

While financial counseling has been provided to millions of low- and moderate-income Americans each year,⁸ financial coaching is a newer method of providing financial education that has gained traction in the last decade and has gained increasing recognition as an effective strategy.⁹ According to Michael Collins, Assistant Professor of Consumer Science and the faculty director of the Center for Financial Security at the University of Wisconsin-Madison, “Coaching is differentiated from counseling in that coaches provide advice and encouragement, and do so in a process largely driven by the client. Coaching is not designed to be a therapeutic

² “Supplemental Poverty Measure: 2010.” Census Bureau, (November 2011).

http://www.census.gov/hhes/povmeas/methodology/supplemental/research/Short_ResearchSPM2010.pdf

³ “Supplemental Poverty Measure: 2010.” Census Bureau, (November 2011).

http://www.census.gov/hhes/povmeas/methodology/supplemental/research/Short_ResearchSPM2010.pdf

⁴ <http://www.fico.com/en/Products/Scoring/Pages/FICO-Expansion-Score.aspx>

⁵ “CFED Assets and Opportunity Scorecard” CFED, (2009).

<http://scorecard.assetsandopportunity.org/2012/measure/liquid-asset-poverty-rate>

⁶ “FDIC National Survey of Unbanked and Underbanked Households.” FDIC, (2011).

http://www.fdic.gov/householdsurvey/2012_unbankedreport.pdf

⁷ “FDIC National Survey of Unbanked and Underbanked Households.” FDIC, (2011).

http://www.fdic.gov/householdsurvey/2012_unbankedreport.pdf

⁸ Sledge, J., Gordon, S. and Knisley, M. “Making the Shift from Financial Education to Financial Capability: Evidence from the Financial Capability Innovation Fund.” CFSI, (2011).

http://cfsinnovation.com/system/files/CFSI_FinCapTrends_Mar2011_final.pdf

⁹ The NYC coaching program, through the Financial Empowerment Centers, has served over 15,500 New Yorkers, reduced over \$7 million in debt, and build \$900,000 in savings.

<http://www.mikebloomberg.com/index.cfm?objectid=EB1BE61C-C29C-7CA2-F837D024A96EAC50>

relationship or to aid clients in a more acute crisis resolution.”¹⁰ Non-profit organizations and financial service providers currently offer financial counseling to millions of Americans each year¹¹ and some providers also offer coaching. Coaching and counseling programs have proven to increase savings and participation in retirement plans,¹² improve credit management,¹³ and in the case of counseling, reduce the likelihood of default on a mortgage.¹⁴

By broadening access to knowledgeable coaches through this procurement, CFPB has a unique opportunity to provide transitioning veterans and vulnerable consumers the information and tools they need to make better financial decisions, establish their personal goals, and implement strategies to achieve them. The project delivers financial coaching where the consumers are already receiving services, which is a way to leverage existing resources and available channels. The veterans’ program will serve all 50 states and account for more than 70% of the budget as well as of the expected number of persons to be served.

2.0 OBJECTIVE

The CFPB seeks project support services related to the development, implementation, management, and evaluation of a national financial coaching project. Under the project, the CFPB will provide financial coaching services to transitioning veterans and for economically vulnerable consumers so that they may proactively identify and address financial challenges and goals. The project will require the placement of financial coaches who have financial counseling certifications, industry-recognized coaching training (to be provided through the contract), and experience working with the two target populations (veterans and economically vulnerable consumers) in existing points of direct service, such as job training or social services. The premise is that when these consumers access other assistance they can also be coached in the financial aspects of their issues, resulting in both behavior change and improved outcomes. The CFPB estimates that over three years, as many as 21,000 veterans, as well as an estimated 7,200 economically vulnerable consumers, could benefit from financial coaching services.

3.0 SCOPE

Overview

As this project is national in scope, the Contractor will be responsible for providing project support services that will assist the CFPB in serving the needs of a diverse group of transitioning

¹⁰ Collins, Michael. “Using a Financial Coaching Approach to Help Low-Income Families Achieve Economic Success: Challenges and Opportunities for the Field” (2010).

¹¹ Sledge, J., Gordon, S. and Knisley, M. “Making the Shift from Financial Education to Financial Capability: Evidence from the Financial Capability Innovation Fund.” CFSI, (2011).

http://cfsinnovation.com/system/files/CFSI_FinCapTrends_Mar2011_final.pdf

¹²“Financial Literacy; Needs, Strategies, Opportunity.” New America Foundation, (April, 2008).

<http://newamerica.net/files/SeidmanPPT.pdf>

¹³ Collins, Michael. “Effects of Mandatory Financial Education on Low Income Clients.” University of Wisconsin, (2010). <http://www.irp.wisc.edu/publications/focus/pdfs/foc271c.pdf>

¹⁴“Financial Literacy; Needs, Strategies, Opportunity.” New America Foundation, (April, 2008).

<http://newamerica.net/files/SeidmanPPT.pdf>

veterans and economically vulnerable consumers from across the country. The Contractor would recruit, hire, train, manage and supervise financial coaches who would be integrated into the delivery of services provided by organizations already providing support to veterans and to low-income and other economically vulnerable consumers. The financial coaches will work with clients over the course of four visits, on average, and depending on client need.

Period of Performance

The base period of performance is three years from date of award, with two one-year option periods.

Two Components

The project has two related, but distinct, components:

- In the veteran-focused component, services will be delivered to transitioning veterans at 70 sites across the country selected from among Veterans Affairs (VA) Vet Centers and Department of Labor (DOL) American Job Centers. The sites would be selected based on need and population density.
- In the component focused on economically vulnerable consumers, the Contractor would advise the Bureau in the selection of 20 appropriate locations from which to deliver coaching services to those consumers. The contractor may advise the selection of 20 independent local organizations, through a partnership with one or more national organization(s) with affiliates, or a mix of both of these strategies. The organizations should be focused on vulnerable consumers and have the capacity to integrate a financial coach and oversee the delivery of financial coaching services in local, geographically diverse affiliate sites.

4.0 STATEMENT OF WORK

The work to be encompassed by the contract to be awarded shall cover all services related to the development, implementation, management, and evaluation of the CFPB's national financial coaching project. The CFPB intends to award one Indefinite Delivery/Indefinite Quantity (IDIQ) contract as a result of the future solicitation, but will reserve the right to issue multiple awards or no awards.

All actual work under the Contract will be performed pursuant to individual task order. The general task areas in which services may be required, and certain deliverables associated with each task area, are detailed below:

Task Areas & Deliverables

- Task Area 1: Development of Program Infrastructure
- Task Area 2: Implementation & Management of the Program
- Task Area 3: Evaluation of the Program

Task Area 1: Development of Program Infrastructure

In partnership with the CFPB, and subject to CFPB approval, the Contractor shall:

1. Advise CFPB in the selection of 90 program sites for financial coaching delivery;
 - a. Identify and propose to the CFPB 20 potential sites to provide financial coaching for economically vulnerable consumers;
 - b. Coordinate with the CFPB and other relevant Federal Government agencies to identify and propose 70 potential sites to provide financial coaching for transitioning veterans, their spouses, and surviving spouses; and
 - c. Develop partnership agreements between the sites and the Contractor.
2. Develop a plan to recruit, staff, train, and manage qualified coaches and any necessary contract personnel needed for performance at the 90 selected financial coaching delivery sites. The plan should include:
 - a. Position descriptions, required qualifications and skills for contract personnel, to include at minimum financial counselors that have experience with the target populations (to be trained in financial coaching techniques through the project);
 - b. A plan for recruiting qualified financial coaches and other necessary contract personnel;
 - c. Description of the selected financial coaching training and ongoing professional development, which must at minimum include:
 - i. Training in an approach that is client-driven, with focused strategies that lead to behavior change, including those that involve goal-setting, practice and accountability, and confidence-building. The approach should be suitable for short-to-medium term contact, where coaches engage with clients an average of four visits per client.
 - ii. A training model that includes opportunities for coaches to practice, such as through role-playing, job shadowing, and/or triad exercises.
 - iii. An explanation of how the training meets financial education field/industry standards in terms of employing best practices, and being vetted or tested.
 - d. Proposed financial management resources, including educational tools and approaches to client interaction solutions that facilitate goal-setting, budgeting, and debt-reduction. Selected resources, tools and solutions are subject to CFPB approval.
 - e. Opportunities for ongoing staff professional development and support, including peer-support.
 - f. A process to address or mitigate contractor performance issues as they arise.
3. Develop plan to integrate the financial coaching program at each selected site that must, at minimum, include the following:
 - a. Implementation of financial coaching.
 - b. Regular personnel management and oversight, and quality control of services being provided.
 - c. Staff retention and attrition.
 - d. Fiscal controls (e.g. including procedures to responsibly allocate contract dollars budgeted, and other financial aspects of the program).
 - e. System to track issues, number of persons served, and hours of service provided.

4. Develop a plan for the evaluation activities, which includes:
 - a. A plan for the outcome evaluation including the identification of the appropriate measures to be collected, a description of the process, systems and/or tools used to collect the data, and a plan for reporting the outcomes and high level trends/key takeaways to the Bureau.
 - b. Recommended outcome tracking system, including, if necessary, the incorporation of tools/software in order to collect and report outcome data. Such a system should accommodate and be streamlined with, to the extent possible, the existing systems the different sites (across the entire project) are already using.
 - c. Incorporation of a process evaluation.
 - d. The capacity to accommodate the potential inclusion of an impact evaluation beginning two to three years into the project.
5. Assist the CFPB with the preparation of any necessary Paperwork Reduction Act (PRA) Clearance materials;
6. Submit monthly reports to the CFPB detailing project updates.

Task Area 2: Implementation and Management of the Program

The Contractor shall, subject to CFPB approval:

1. Implement approved plans to recruit, staff, train, and manage a financial coach (and other necessary contract personnel, if any) for each site;
 - a. Ensure coaches meet experience requirements. Resumes for the 90 proposed coaches (one for each site) are to be submitted for CFPB review and approval prior to placement.
 - b. Deliver financial coaching training based on the plan approved by the CFPB
2. Implement the program integration and management plans;
3. Implement plans to provide oversight and management of staff, including:
 - a. Provision of on-site management of coaches and all other contract personnel to ensure successful performance.
 - b. A process to address or mitigate contractor performance issues as they arise.
4. Implement regular quality monitoring and quality control processes for the program, including fiscal controls;
5. Implement the evaluation components of the project, including:
 - a. The incorporation of systems and procedures for rigorous outcome tracking and evaluation. This includes the measures identified and approved in the plan and, if necessary, the incorporation of tools in order to collect and report outcome data.
 - b. A process evaluation;
 - c. The potential inclusion of an impact evaluation beginning two to three years into the project.
6. Participate in quarterly in-person meetings with CFPB to provide project updates;
7. Submit monthly reports to the CFPB detailing project updates; and
8. Submit an annual report at the end of each year. This report should detail the activities of the project to date, and any key findings and takeaways derived from the evaluation components of the project.

9. Assist the CFPB with the preparation of any necessary Paperwork Reduction Act (PRA) Clearance materials.

Task Area 3: Evaluation of the Program

The Contractor shall, subject to CFPB approval:

1. Collect outcome data from coaches on identified measures; using the approved outcome tracking systems and tools;
2. Identify issues that arise and other trends to report to the CFPB as part of analysis. Issues and trends must include, at a minimum, implementation-related issues that arise, or client-level trends that are identified, when receiving information across the 90 sites.
 - a. Use qualitative feedback from staff and coaches as well as administrative data;
 - b. At the close of the first and second contract year, the CFPB will use the feedback to refine the work to be performed by the Contractor for the subsequent year;
3. Assist the CFPB with the preparation of any necessary Paperwork Reduction Act (PRA) Clearance materials;
4. Provide updated outcome data to be included in the monthly and annual reports submitted to the CFPB. Annual report should also include lessons learned from the process evaluation.

6.0 PLACE OF PERFORMANCE

This project is national in scope, serving the needs of transitioning veterans and economically vulnerable consumers from differing backgrounds and circumstances and from across the country. The place of performance will include the Contractor's facilities, CFPB offices for meetings, and various service sites, as described below. The contracted organization(s) would recruit, staff, train, and manage the coaches and any other contract personnel needed to perform at the selected sites.

Service Sites for Transitioning Veterans

The Contractor(s) will deliver services to transitioning veterans at 70 locations across the country, which is intended to be selected from among VA Vet Centers as well as DOL Career One-Stop Centers. The sites would be considered for the program by the CFPB, VA, DOL and the Contractor collaboratively, based on need and population density. New research soon to be published in the journal *Armed Forces & Society* concludes that veterans have not only been shrinking as a share of the population: those who remain have also been segregating into a smaller and smaller slice of rural America, often near military installations in states such as Florida, Texas and Alabama.¹⁵

- **VA Vet Centers.** The Vet Center Program was established by Congress in 1979 out of the recognition that a significant number of Vietnam-era vets were still experiencing readjustment problems. Readjustment counseling encompasses a wide range of psycho-

¹⁵ "The Growing Rural Isolation of Veterans" Badger E., (Reuters, Nov 2012)
<http://www.nytimes.com/2012/11/09/giving/after-war-more-veterans-find-more-help.html>

social services offered to eligible veterans and their families in the effort to make a successful transition from military to civilian life. In Fiscal Year 2011, the Vet Center program provided 1,377,028 visits to 189,811 veterans and their families.

- **DOL Americas Job Centers.** These centers are designed to provide a full range of assistance to job-seekers under one roof. There are over 2,000 centers nationwide offering career counseling and career development services. Veterans needing employment are economically vulnerable and have the potential of becoming homeless, involved in domestic violence, and at risk of suicide.

Service Sites for Economically Vulnerable Consumers

Economically vulnerable consumers would receive financial coaching services at 20 local sites that are currently providing direct services to low-income and economically vulnerable consumers. These sites should be diverse in terms of geographic location, and include those from urban and rural communities, and from different cultural, ethnic, racial, and other backgrounds. The sites should also have the capacity to integrate and oversee the delivery of financial coaching services. The Contractor would advise the Bureau in its selection of 20 appropriate locations from which to deliver financial coaching services to economically vulnerable consumers. The Contractor may choose to utilize 20 independent local organizations, partner with a national organization(s) that has affiliates, or adopt a hybrid of the two approaches.

6.0 EVALUATION CRITERIA

Proposals will be evaluated based on price as well as four non-price evaluation factors, which are listed below in descending order of importance:

- (1) Firm and Key Personnel Expertise;
- (2) Technical Approach and Project Management Plan;
- (3) Past Performance; and
- (4) Small Business Participation.

A price reasonableness analysis will be conducted separately by the Contracting Officer. The non-price evaluation factors, when combined, are significantly more important than the price evaluation factor.

Please note: The CFPB intends to award based on initial proposals, but reserves the right to conduct oral presentations and/or conduct discussions and receive revised proposals prior to award. The term “Offeror,” as used in this section, is defined as the firm, any major subcontractors and any teaming partners. The term “key personnel,” as used in this section, is defined as those individuals who have project management responsibility or perform any material aspect of the work (excluding financial coaches).

Factor 1 – Firm and Key Personnel Expertise

Evaluation Criteria

The CFPB will evaluate the expertise of the Offeror and all key personnel in performing the same or similar work as that encompassed by the Statement of Work (SOW). The CFPB will evaluate the depth and breadth of expertise as evidenced by the complexity of recent and relevant engagements performed.

At minimum, the proposal must demonstrate experience and expertise in:

- The management and quality control of a large, national contract;
- The recruiting, staffing, training, and managing of disparately located staff;
- Financial education and coaching, programs, approaches, and best practices;
- Nationally recognized industry organizations and groups pertinent to the targeted populations and this project e.g. Accredited Financial Counselor (AFC) and the Financial Industry Regulatory Authority (FINRA) Foundation Military Spouse Fellowship Program;
- Working with and/or providing services to the two targeted populations: military and veteran populations and economically vulnerable consumers; and
- Utilizing and incorporating evaluation methods, including outcome tracking, reporting, and process evaluation.

Submission Instructions

Offerors shall describe its expertise, as evidenced by performance of work relevant to that described in the SOW during or after 2008. Summarize the engagements, the Offeror's role, date(s) of performance, and the total dollar amount of the engagement.

Factor 2 – Technical Approach and Project Management Plan

Evaluation Criteria

The CFPB will evaluate the Offeror's proposed Technical Approach and Project Management Plan for performance under the contract based on its effectiveness to perform the Task Areas and provide the associated deliverables identified in the SOW in alignment with financial coaching field standards and best practices. The Technical Approach and Project Management Plan must demonstrate the Offeror's ability to:

A. Technical Approach

- Develop and implement a process to identify 20 delivery locations for economically vulnerable component and collaborate with VA, DOL, and the CFPB in the consideration of 70 delivery sites for veterans;
- Monitor the quality of the financial coaching services being delivered and make needed adjustments in the processes, systems and approaches being used;
- Scale up or scale down as the needs of the population and/or project change;
- Implement systems for tracking outcomes and evaluating processes;
- Train and orient processes for both service providers and hosting agencies to the program and implementation processes.

- Recruit, staff, train, and manage disparately located contract personnel, and:
 - Utilize coaches who have the Accredited Financial Counselor (AFC) certification, and experience with the respective populations, such FINRA Foundation Military Spouse Fellows, military retirees and veterans.
 - Provide financial coaching training that meets industry/field-recognized best practices and standards.

B. Project Management Plan

- Provide a plan that defines the roles and availability of all proposed key personnel, including an organizational chart demonstrating all proposed management and staffing;
- Organize and manage complex workflows among partners and subcontractors;
- Communicate and market the project to internal and external stakeholders;
- Provide quality oversight of the coaches and the data tracking and reporting;
- A process to address or mitigate contractor performance issues as they arise.

Submission Instructions

Offerors shall submit a detailed narrative describing their Technical Approach and Project Management Plan, addressing the criteria described above. Include a thorough discussion of your Technical Approach to perform the work required by the SOW and submit a comprehensive Project Management Plan showing your staffing and management strategy for this requirement.

Factor 3 – Past Performance

Evaluation Criteria

The CFPB will evaluate the Offeror’s recent performance on previous contracts that are relevant in terms of size, scope, and/or complexity to this project. The assessment will be based upon past performance for companies or agencies who have received relevant services from the Offeror during or since 2008. The assessment may also be based on relevant past performance information otherwise obtained by the CFPB.

Note: If the Offeror has no record of relevant past performance, or if no past performance information is received or otherwise obtained, the Offeror’s will be assigned a neutral rating under this factor.

Submission Instructions

The Offeror shall submit a copy of the Past Performance Questionnaire (PPQ) (to be provided by CFPB) to up to five (5) companies (including non-profit and similar organizations) and/or agencies (Federal, State, or local) which have received contracted services from the Offeror (and any relevant predecessor company) for the same or similar services as those specified in the SOW during or since 2008. The companies/agencies shall submit completed questionnaires directly to the CFPB via email to Nicholas.Olson@cfpb.gov and Matthew.Chmielewski@cfpb.gov. Any PPQs received by the Government after the time specified for proposal submission will **not** be considered.

Factor 4 – Small Business Participation

A. Small Business Participation Plan (applicable to large and small businesses*)

The CFPB will evaluate the extent of an Offeror’s planned small business participation.

Submission Instruction:

All Offerors must submit a Small Business Participation Plan which addresses how they plan to include small businesses in the performance of the Contract. All Offerors must:

1. Identify the extent to which Small Businesses (SBs), Veteran-Owned Small Businesses (VOSBs), Service-Disabled Veteran-Owned Small Businesses (SDVOSBs), Historically Underutilized Business Zone Small Businesses (HUBZones), Small Disadvantaged Businesses (SDBs) and Woman-Owned Small Businesses (WOSBs) will be utilized in the performance of the contract (for example, percentage of work, type of meaningful work, whether prime contractor, joint venture team member, subcontractor or contractor team arrangement member, if applicable). If the Offeror is itself a small business, the Offeror shall also identify their own participation as a SB, VOSB, SDVOSB, HUBZone, SDB or WOSB.
2. Identify the names of the SBs, VOSBs, SDVOSBs, HUBZones, SDBs or WOSBs who will participate on the contract, the products and/or services to be performed and the estimated total dollars of such work.
3. Address the extent of commitment to utilize the team members in performance of the contract (for example, length of the relationship, whether there is a written agreement). Offerors are encouraged to provide copies of agreements, to include joint ventures, mentor-protégé agreements, or contractor team arrangement documents, or letters of commitment to subcontract.
4. Provide prior performance information, if any, on no more than five (5) contracts that were performed within the three years from the proposal submission date which included FAR clause 52.219-8, “Utilization of Small Business Concerns” and/or FAR clause 52.219-9, “Small Business Subcontracting Plan” and show the actual performance or compliance with these FAR clauses. Assessment of compliance with these clauses will be made independently of the Past Performance Evaluation. Offeror’s prior performance information shall include the following:
 - a. If the Offeror is Other Than Small:
 - (1) Name of the contracting activity;
 - (2) Contract number;
 - (3) Total contract value;
 - (4) List of major subcontractors/teaming partners;
 - (5) The role(s) of the subcontractor(s) involved;
 - (6) The applicable goals and actual performance (dollars and percentages) for subcontracting with the types of small business concerns listed in FAR Clause 52.219-9;

- (7) A Subcontracting Report for Individual Contracts (ISR), Summary Subcontract Report (SSR) and any other documentation of actual accomplishments of the goals established under the subcontracting plans of prior contracts, identifying historical performance for each SB goal category, the goal approved for each category, and the actual goal achievement; and
- (8) If applicable, Offeror may provide information on subcontracting related problems encountered on the contracts identified above, and corrective actions taken to resolve those problems.

b. If the Offeror is Small:

- (1) Name of the contracting activity;
- (2) Contract number;
- (3) Total contract value;
- (4) Subcontract number, if applicable;
- (5) Total subcontract value;
- (6) List of major participating firms/teaming partners;
- (7) A description of the Offeror’s role(s) as a subcontractor or teaming partner; and
- (8) The actual performance (dollars and percentages) as a subcontractor or teaming partner.

A Sample Small Business Participation Plan will be provided by CFPB at the time of Solicitation release, and is a suggested model for formulating a Small Business Participation Plan. **Other formats of a participation plan are also permissible.**

B. Small Business Subcontracting Plan (applicable only to large businesses)

In addition to the small business participation plan, Offerors that are not small businesses under NAICS Code 541990 shall submit a Small Business Subcontracting Plan as required by FAR clause 52.219-9. The Size Standard for NAICS code 541990 is \$14.0 million. If your firm submits a Small Business Subcontracting Plan containing goals that are appreciably different from CFPB’s stated Small Business Subcontracting goal (44.7% of subcontracting dollars) and subgoals, provide an explanation as to why this work cannot be subcontracted to small businesses to the extent of CFPB’s stated Small Business Subcontracting goal and subgoals.

For your reference, the following are CFPB’s current small business prime contract and subcontract goals and subgoals:

Category	Goal
PRIME CONTRACTS	
Small Business	28.5%
Small Disadvantaged Business	5%
Women-Owned Small Business	5%
Service-Disabled Veteran-Owned Small Business	3%
HUBZone Small Business	3%

SUBCONTRACTS

Small Business	40.0%
Small Disadvantaged Business	5%
Women-Owned Small Business	5%
HUBZone Small Business	3%
Service-Disabled Veteran-Owned Small Business	3%

A Sample Subcontracting Plan will be provided by CFPB at the time of Solicitation release. While this model plan has been designed to be consistent with FAR 52.219-9, other formats of a subcontracting plan are permissible. The use of this model plan is not intended to waive other requirements that may be applicable under FAR 52.219-9.

“Subcontract,” as used in this clause, means any agreement (other than one involving an employer-employee relationship) entered into by a Federal Government prime contractor or subcontractor calling for supplies or services required for performance of the contract or subcontract.

[*Standard applicable clauses to be included in finalized solicitation.]