



November 3, 2025

Federal Acquisition Regulatory Council
General Services Administration
Washington, D.C.

Subject: Comments on FAR Part 19 Deviation

Dear FAR Council,

The Coalition for Common Sense in Government Procurement (Coalition) appreciates the opportunity to comment on the General Services Administration's (GSA) Class Deviation concerning Federal Acquisition (FAR) Part 19 (Small Business).

By way of background, the Coalition is a non-profit association of firms selling commercial services and products to the Federal Government. Our members include small, medium and large business concerns which collectively perform \$145 billion in Federal contracts annually. The Coalition is proud to have collaborated with Government officials for over 45 years in promoting the mutual goal of common-sense acquisition.

With respect to small business subcontracting plans, we noticed that the deviated FAR clause 52.219-9 requires Women-Owned Small Business (WOSB) concerns and Veteran-Owned Small Business (VOSB) concerns to be certified by the Small Business Administration (SBA). We do not believe that Federal law or SBA's regulations require WOSB or VOSB certification for small business subcontracting plans. Acquiring and maintaining WOSB and VOSB certification for subcontracting purposes is an added cost and burden for firms that do not wish to participate in the Federal prime contract market. Consequently, we think the FAR Council should provide an explanation for this new policy. In addition, some WOSBs are certified by third-party certifiers, as authorized by statute and SBA regulation. The FAR Council should clarify whether WOSBs certified by third-party certifiers qualify as certified by SBA for purposes of FAR 52.219-9. Finally, this policy will impact the available pool of WOSBs and VOSBs for subcontracting plan purposes. Thus, we urge the FAR Council to provide guidance to contracting officers to establish realistic WOSB and VOSB subcontracting plan goals based on these new requirements.

The Coalition hopes you find these comments useful and thanks you for your time and consideration. If you have any questions, I may be reached at (202) 899-2986 ext. 129 or kdodds@thecgp.org.

Regards,

Kenneth Dodds
Executive Vice President & General Counsel