WPS Health Solutions
Small Business Subcontracting Program Policy

Purpose
The purpose of this policy is to ensure Wisconsin Physicians Service Insurance Corporation (including its wholly owned subsidiaries EPIC Specialty Benefits and Arise Health Plan) herein referred to as “WPS”, comply with small business utilization and subcontracting plan requirements consistent with public laws and regulatory and contract requirements.

Objectives
To promote and support small business utilization for WPS procurements.

Participation
WPS currently is using a self-certification form that it sends to new suppliers and subcontractors and updates the supplier/subcontractor database along with information from the System for Award Management (SAM). It is WPS’s goal to have its suppliers and subcontractors registered in SAM and encourages its suppliers and subcontractors to register in SAM.

Scope
This policy applies to WPS procurements under U.S. Government contracts or subcontracts.

Corporate Policy Statements

- WPS Executive Vice President, Military and Veterans Health (focused primarily with procurements associated with the Military and Veterans Health operations), and WPS Vice President, Accounting Services (focused primarily with procurements associated with Medicare Government Health Administration and Corporate), are officially appointed Small Business Liaison Officers (SBLO) on behalf of WPS by the WPS President and CEO. The WPS Director of Procurement Services will support the SBLOs to ensure compliance with the WPS Small Business Subcontracting Program Policy.

- It is WPS’s general policy to ensure compliance with public laws, regulations and contract requirements related to small business utilization and subcontracting plans. Specifically, it is WPS’s policy that small business concerns (SB), veteran-owned small business concerns (VOSB), service-disabled veteran-owned small business concerns (SDVOSB), HUBZone small business concerns, small disadvantaged business concerns (SDB), women-owned small business concerns (WOSB) and Historically Black Colleges & Universities and Minority Institutions (HBCU-MI) shall have the maximum practical opportunity to participate in performing under contracts let by any Federal agency, including subcontracts. WPS shall conform to this policy in the award of subcontracts and purchase orders to the fullest extent consistent with efficient contract performance.
• WPS shall ensure timely payment of amounts due pursuant to the terms of its U.S. Government prime contracts and subcontracts with small business concerns, veteran-owned small business concerns, service-disabled veteran owned small business concerns, HUBZone small business concerns, small disadvantaged business concerns, women-owned small business concerns, and Historically Black Colleges & Universities and Minority Institutions.

• WPS shall cooperate in any studies or surveys as may be conducted by the United States Small Business Administration (SBA) or the awarding agency of the United States Government as may be necessary to determine the extent of WPS’s compliance.

• WPS will comply with the requirements to provide an acceptable small business subcontracting plan for contracts, contract modifications or subcontracts that individually are expected to exceed the small business subcontracting statutory dollar threshold and that has subcontracting possibilities.

• WPS will comply with the flow-down requirements for small business subcontracting contract clauses to its suppliers/subcontractors, and specifically require large business suppliers/subcontractors to provide an acceptable small business subcontracting plan for subcontracts, purchase orders and modifications that individually are expected to exceed the small business subcontracting plan statutory dollar threshold and that has subcontracting possibilities.

• WPS relies on written representations by their suppliers/subcontractors regarding their status as a small business concern, a veteran-owned small business concern, a service-disabled veteran-owned small business concern, a small disadvantaged business concern, or a women-owned small business concern, and Historically Black Colleges & Universities and Minority Institutions. WPS shall confirm that a supplier/subcontractor representing itself as a HUBZone small business concern is certified by the Small Business Administration (SBA) as a HUBZone small business concern by accessing the System for Award Management database or by contacting the SBA.

References

Public Law 95-507
FAR Part 19, Small Business Programs
FAR Clause 52-219-8 Utilization of Small Business Concerns
FAR Clause 52-219-9 Small Business Subcontracting Plan

Approved By: Michael F. Hamerlik
Title: President and CEO
Effective Date: August 2001
Last Revised Date: July 5th, 2017