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Understanding Socio-Economic Evaluations

8/13/2024

Objectives & Points of Reference

This is the 6th seminar segment of seven segments on Understanding Source Selection Evaluations

In this short period, we provide you a broad forum for discussion of Socio-Economic evaluation

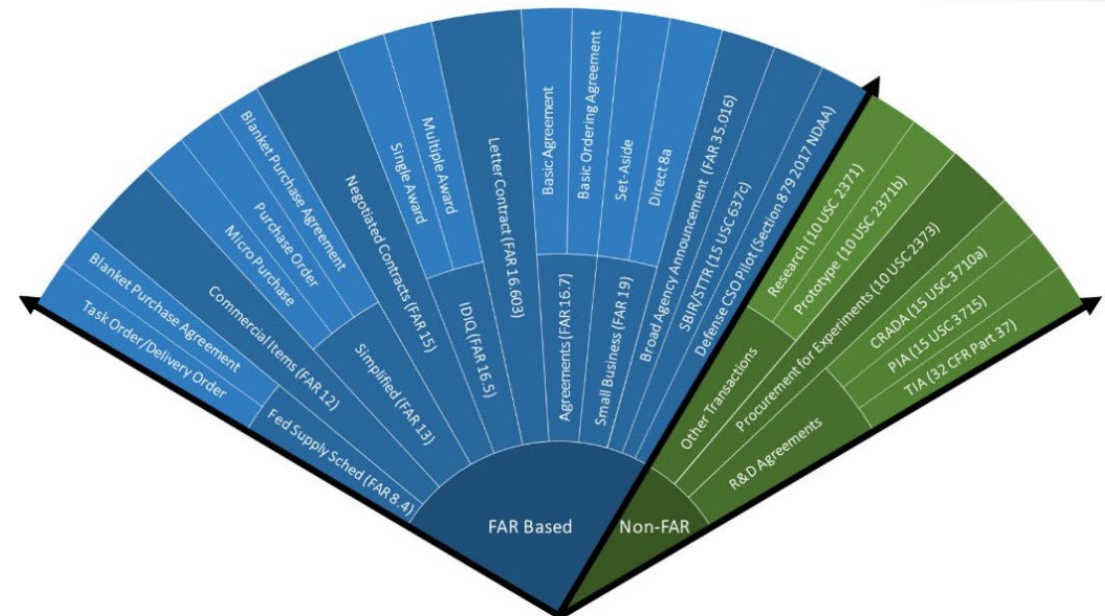
Multiple personalities abide here: “Am I source selection (former)?”, or “Am I industry (currently)?”

- I will talk from both perspectives (I will try to be clear as to role) – if not, ask please

We use selected guidance references, including Protest Case outcomes, though evaluation specifics can vary between agencies (slightly, in the big scheme of things)

- E.g., Is it FAR or an Agency specific supplement, e.g., DFAR for DoD, or NFS for NASA, etc. ...or is it not even FAR based?
- We refer to multiple FAR Clauses, USC’s, and Protest Cases to: Agency / Court of Federal Claims / Government Accountability Office to: Agency / Court of Federal Claims / Government Accountability Office
 - We WILL be splitting hairs (that’s the name of the game with the FAR – rules are very detailed and specific – following a “well it seems...” course of thinking is VERY dangerous – LOOK IT UP – key reference links are provided below

Small Print!



Discussion Topics...

Why?

Statutory and regulatory provisions affecting Socio-Economic evaluations

Socio-Economic categories (“small business categories”) and **certification**

Limitation on subcontracting by a Small Businesses

Small Business Set-Aside decisions, evaluations, and “the rule of two”

Technical and Price evaluations

Small Business **Subcontracting Plans** & Small Business **Participation Plans** – the difference?

Typical Socio-Economic **evaluation schemes**

Common agency and contractor **mistakes**

Added areas for suggested self-study outside the scope of this discussion

Why?

FAR 52.219-8 -- Utilization of Small Business Concerns

- (b) ***It is the policy of the United States that small business concerns, (including socioeconomic concerns) shall have the maximum practicable opportunity to participate in performing contracts let by any Federal agency, including contracts and subcontracts for subsystems, assemblies, components, and related services for major systems...***
- (c) The Contractor hereby agrees to carry out this policy in the awarding of subcontracts to the fullest extent consistent with efficient contract performance...

Note: This policy applies to other than small businesses and small businesses

If you have any questions about responsibilities as a Prime in reference to representations by a subcontractor re: its size or socioeconomic status – read this FAR Section (its an easy one page read)

Authorities For Socio-Economic Evaluations

Promoting the interests of small businesses helps promote full and free competition; the preservation and expansion of free competition is basic not only to the economic well-being but to the security of the Nation

- 15 U.S.C. Section 631-50

It is the declared policy of the Congress that the government shall insure that a “fair proportion” of government contracts and purchases for property and services be placed with small businesses

- 15 U.S.C. Section 644(g)

The Result?

FAR Part 19 implements the Small Business Act

Federal government agencies have “goals” (some would say, quotas) for the award of contracts to small businesses

Federal government agencies are going to do whatever they can to meet these statutory goals

- Market research is an important part of acquisition planning to determine whether procurement can be set-aside for small business concerns
 - Market research is conducted to determine if:
 - Commercial items are available
 - Extent of competition
 - Small businesses are capable of performing as prime contractors or subcontractors

Socio-economic concerns often become a part of the agency’s evaluation of proposals



The COFC/GAO Standard of Review

Protests to: Agency / Court of Federal Claims / Government Accountability Office

Same as with other evaluation areas: whether the agency's evaluation was reasonable and consistent with stated evaluation criteria and applicable procurement statutes and regulations

Mere disagreement with an agency's judgment is not sufficient to render an evaluation unreasonable

Agencies are in the best position to judge the socio-economic aspects of offerors and their proposals

Here, SBA has a significant role as we will discuss

Socio-Economic Categories

Small Business

SBA 8(a) Business Development Program

Small Disadvantaged Businesses

Historically Underutilized Business Zone (HUBZone)

Women-Owned Small Businesses (WOSB)

Economically Disadvantaged Women-Owned Small Business (EDWOSB)

Alaska Native Corporations (ANC)

Veteran-Owned Small Businesses (VOSB)

Service-Disabled, Veteran-Owned Small Businesses (SDVOSB)

Socio-Economic Certification / Approval

Small Business: self-certification

8(a): self-certification and SBA approval

SDB: self-certification and SBA approval

HUBZone: SBA certification and SBA approval

WOSB: self-certification and SBA approval

EDWOSB: self-certification and SBA approval

ANC: self-certification and SBA approval

VOSB & SDVOSB: (Previously self-certified with VA approval, now SBA approval)

- The 2021 NDAA eliminates service-disabled veteran-owned small business self-certification and adopts a government-wide VOSB SDVOSB certification requirement, while transferring control of the certification process from the VA to the SBA
 - Previous self certifications have a grace period 1-year from NDAA to apply and be approved by the SBA

But What is Small?

Examples only

Small Business Administration (SBA) – Table of Small Business Size Standards Matched To North American Industry Classification System (NAICS) Codes (17 Mar, 2023) [Table of size standards | U.S. Small Business Administration \(sba.gov\)](#)

- 541519 Other Computer Related Services Size Standard: \$34M
- 541330 Engineering Services Size Standard: \$25.5M
 - Except Military and Aerospace Equipment and Military Weapons Size Standard: \$47M
 - Except Contracts/Sub for Engineering Services Awarded Under the National Energy Policy Act of 92 Size Standard: \$47M
 - Marine Engineering and Naval Architecture Size Standard: \$47M
- 541713 Research and Technology in Nanotechnology¹¹ Size Standard: 1,000¹¹ employees
 - Substantial notes
- And so on for ~1,100 entries

13 CFR § 121.104 and 13 CFR § 121.106 – How to calculate the average annual receipts of a company

- E.g., most recently completed 5 fiscal years – average
- E.g., employees average over preceding 12 calendar months (part time count as full time)

Small Business Set-Aside Decisions

Size Representations – A case study

The contracting officer shall accept an offeror's representation that it is a small business concern unless another offeror challenges that representation or the contracting officer has some reason to question the representation

- FAR § 19.301
- AMI Constr., B-286351, Dec. 27, 2000
 - AMI Construction protests the award of a contract to N.A. Degerstrom, Inc. under invitation for bids (IFB) issued by the USDA, Forest Service, for mine reclamation work
 - The IFB schedule requested prices for 12-line items of work (totaled into a base bid) and for an additive item
 - "offers will be evaluated by adding a factor of 10 percent to the price of all offers except . . . offers from HUBZone small business concerns that have not waived the evaluation preference."
 - A HUBZone small business concern was defined in the IFB as one that appears on the list maintained by the Small Business Administration (SBA)
 - Nine bids in response to the IFB were opened on September 11. Degerstrom's base bid price was the lowest at \$686,564.80 (if 10% were added, it would be \$755,221.28) and AMI's base bid price was next lowest at \$744,418.16 – with the HUBZone preference, AMI would have been the lowest evaluated price
 - In its bid, AMI certified that it met the HUBZone small business concern classification. If the 10 percent preference was applied, AMI's base bid price was the lowest
 - Note: In SBA database, AMI was not identified under the proper SIC code (Std Industrial Class Code), Forest Service's local SBA office advised without the SIC Code, AMI was not eligible for the HUBZone 10% preference – CO decided AMI was not eligible for the preference based on the absence of the SIC Code
 - CO decision was an improper usurpation of the SBA's authority – protest sustained
 - SBA pointed out that the determination of whether a firm is small for purposes of a particular procurement is separate from the determination of whether the firm is a qualified HUBZone small business concern (although the latter does include a determination that the firm is small for purposes of its primary industry classification - SIC) – the CO treated these two decisions as one
 - There is no dispute that AMI was a HUBZone (was on the listing) – the only question was the SIC code
 - The SBA, not the procuring agency, has conclusive authority to determine size status matters for federal procurements
 - The CO must either accept the firm's self-certification or (if the self-certification is challenged or the contracting officer has reason to question the representation) refer the matter to the SBA; the contracting officer does not have authority to reject the self-certification
 - While an agency may find it helpful to review the PRO-Net site (noting the SIC code is not there), that review is not an adequate substitute for referral to the SBA
 - Considering an applicable evaluation preference, SBA viewed it was improper to award on the basis of a higher evaluated bid, even though the actual price of that bid is lower than the low evaluated bid (Sandtex Corp., B-224527, Jan. 30, 1987, at 1-2)
 - However,...the contract was 95% complete at the time of resolution, so SBA recommended Forest Service reimburse AMI its bid preparation costs as well as the cost of filing and pursuing the protest

Small Business Set-Aside Decisions

Size Representations

In negotiated procurement small business set-asides, the agency must give notice of the intended award prior to making contract award

- FAR Subsection 15.503(a)(2); and 19.302(d)(1)

A competing offeror, the SBA, or another interested party (e.g., the contracting officer) may challenge the small business representation of an offeror in a specific offer

- FAR Section 19.302(a)

Small Business Set-Aside Decisions

Size Representations – another case study

If an offeror's status as a small business is challenged, then the SBA will evaluate the business's status and make a determination which is binding on the contracting officer

- FAR Section 19.301
- MTB Investments, Inc., B-275696, Mar. 17, 1997, 97-1 CPD ¶ 112
 - MTBI protests the award of a contract, issued by the U.S. Department of Housing and Urban Development (HUD) as a small business set-aside for appraisal review services
 - MTBI contends that the agency improperly rejected the firm's low quotation based upon a concern about the firm's self-certification that it is a small business without referring the matter to the Small Business Administration (SBA) for a size determination
 - Well...if this is true, how do you think this comes out?
 - Right – sustained (it was true), but first there was drama...
 - 9-months previous on a different procurement the SBA issued a formal size determination (under a different HUD procurement) that MTBI was other than a small business under Standard Industrial Classification (SIC) Code 6531
 - MTBI filed a timely appeal of that adverse determination with the SBA Office of Hearings and Appeals (OHA); the protester's request to SBA for recertification as a small business was delayed by SBA until the OHA ruled on MTBI's appeal
 - The OHA determined that the methodology followed by the SBA in finding MTBI to be other than small was erroneous
 - The OHA remanded the issue of MTBI's small business status back to the SBA area director for a new and complete size determination
 - In particular, the OHA advised the area director to consider amended tax information recently filed by MTBI that was not originally considered
 - Sooo....MTBI sent a copy of the OHA decision to the HUD CO (before proposal submission) and then the next day submitted their proposal (on time) to HUD self-certifying they met the SB status required
 - Drama...HUD CO rejected the self-certification based on their knowledge of the previous (9 months earlier) & made award to the competitor
 - MTBI filed a (new) timely protest with HUD – the CO denied the protest (after talking to the SBA's acting Area Director who indicated the former ruling still stands)
 - However, the same HUD person informed MTBI the OHA decision vacated the previous size determination 3 days prior to MTBI's submission under this procurement that it was clear to submit
 - Then 14 days later, HUD (same person) notified HUD and MTBI that the status was cleared (back-dated to previous to the proposal submission date) – the day after this MTBI filed another protest
 - Sustained – HUD should refer the size issue to SBA, and if MTBI is found to be a small (they were), terminate the current contract, award to MTBI – and allow MTBI to recover protest costs...

Bottom line – there is no fuzz around the challenge to a small business size, it is an SBA decision, not an Agency's decision

Small Business Set-Aside Decisions

Size Representations

A size status protest filed by either the contracting officer or by the SBA is always timely whether filed before or after contract award

- FAR Section 19.302

For other offerors, a size status protest is timely if received by the contracting officer by COB on the 5th business day after the protester received notice of the proposed awardee's identify

- FAR Section 19.302(d)(1)

SBA determinations (made within 10 business days) are final unless appealed

- FAR Section 19.302(g)(2)

SBA decisions are appealable to the SBA Office of Hearings and Appeals (OHA)

- FAR Section 19.302(i)
- [McCaffery & Whitener, Inc., B-250843, Feb. 23, 1993, 93-1 CPD ¶ 168](#)

GAO does not review small business size status protests

- [DynaLantic Corp., B-402326, Mar. 15, 2010, 2010 CPD ¶ 103](#)

COFC will not overrule an SBA determination unless it is arbitrary, capricious, an abuse of discretion, or not IAW law or regulation

- [STELLACOM, Inc. v. U.S., 24 Cl. Ct. 213 \(1991\)](#)

Limitations on Subcontracting by Small Business

If the agency sets aside a procurement for small businesses, certain subcontracting and domestic end item limitations apply to the small business awardee

- FAR Section 52.219-14
- Services: At least 50% of the labor costs “shall be incurred for employees of the concern” (SB prime plus SB subs)
- Supplies: A SB manufacturer must perform at least 50% of the cost of manufacturing, not including the cost of materials
- Construction: The SB must perform at least 15% of the cost of the contract, not including the costs of materials, with its own employees

The contracting officer shall accept an offeror’s representation that it will comply with applicable limitations on subcontracting unless the contracting officer has some reason to question the representation

- Is there something in the offeror’s proposal that indicates noncompliance (e.g., a cost/price proposal which shows that a subcontractor will incur more than 50% of the labor costs)?
- Contract compliance is generally a matter of contract administration, (not proposal evaluation)

Small Business Set-Aside Decisions

Procurements beneath the simplified acquisition threshold (SAT) are automatically reserved for small businesses

- Note: SAT increased from \$150k to \$250k (GSA increased in Mar 2018, DoD Fall of 2018, FAR 31 Aug, 2020)

- ...Unless the contracting officer determines there is not a reasonable expectation of obtaining offers from two or more responsible small business concerns that are competitive in terms of fair market prices, quality, and delivery

Note – if the decision is made there is a reasonable expectation of two, but one or none occurs...

- If the contracting officer receives only one acceptable offer from a responsible small business concern in response to a set-aside, the contracting officer should make an award to that firm
- If the contracting officer receives no acceptable offers from responsible small business concerns, the set-aside shall be withdrawn and the requirement, if still valid, shall be resolicited on an unrestricted basis

Procurements above the SAT are reserved for small businesses when there is: (1) a reasonable expectation of offers from two or more responsible small businesses, and (2) award will be made at fair market prices

- FAR 19.502-2(a & b)

Small Business Set-Aside Decisions

The Kingdomware Technologies, Inc. Story

Congress passes the Veterans Benefits, Health Care, and Information Technology Act of 2006

- 38 U.S.C. Sections 8127-8128

The VA fails to set aside for SD/VOSBs a procurement for computer software and training

Kingdomware protests to the GAO, which sustains the protest

The VA states that they are not going to follow the GAO decision (it's only a recommendation)

Kingdomware protests to the US Court of Federal Claims (COFC)

COFC sides with the VA and denies the protest

Kingdomware appeals COFC decision to the US Court of Appeals for the Federal Circuit (CAFC)

CAFC upholds the COFC decision (2-1)

Kingdomware appeals to the US Supreme Court, which agrees to hear the appeal!

The US Supreme Court side with Kingdomware, 8-0

The "Rule of Two" doesn't just apply when the VA was meeting its SD/VOSB goal, but in all circumstances where the CO reasonably expects at least two SD/VOSBs will submit offers

Technical Evaluation of Small Business

In a “best value” source selection, conduct technical evaluation as you would a large business concern

However, in an LPTA source selection...

- The SBA regulations specifically require a CO to refer a small business concern to the SBA for a Certificate of Competency (COC) determination when the CO has refused to consider a small business concern for award of a contract after evaluating the concern’s offer on a non-comparative basis (e.g., pass/fail, acceptable/unacceptable) under a “responsibility-type” evaluation factors (e.g., experience, key personnel, past performance)
- 13 C.F.R. § 125.5(a)(2)(ii)
- AttainX, Inc.; FreeAlliance.com, LLC, B-413104.5, B-413104.6, Nov. 10, 2016, 2016 CPD ¶ 330 at 4

Technical Evaluation of Small Business

Lawson Environmental Services, LLC, B-416892, B-416892.2, Jan. 8, 2019, 2019 CPD ¶ 17

- EPA awarded small business set-aside contract for environmental remediation services
 - LPTA basis of award (non-comparative evaluation), and corporate experience is evaluation subfactor
- EPA finds Eagle Eye's proposal fails to demonstrate requisite corporate experience, and refers Eagle Eye to SBA for a COC
 - Eagle Eye demonstrates as part of COC process it has required corporate experience (even if it didn't show this in its proposal to EPA), and SBA finds it to be responsible – EPA awards to Eagle Eye
- Lawson protests the decision as "was misguided in their belief that they were required to request a Certificate of Competency (COC) from the SBA prior to disqualifying the awardee for their failure to meet minimum technical requirements of the RFP
- GAO denies protest: EPA nor SBA violated regulations (all the GAO is allowed to review in this case)

Price Evaluation Adjustments for Small Disadvantaged Businesses and HUBZones

Can be used when procurement not set-aside for SBs (i.e., full and open competition)

Use when procurement value is above the simplified acquisition threshold (\$250k, slide 17)

A price preference of 10% is generally applied (by adding a 10% factor) against non-SDBs (or non-HUBZones) or otherwise successful offers from SBs

A SB that is both a HUBZone and SDB may receive the benefit of both price evaluation preferences!

- FAR Subsections 19.1102, and 19.1307

Small Business Subcontracting Plan

Submitted by a large business offeror indicating the extent to which it plans subcontracting with small business concerns to perform on the contract

- Small Businesses are not required to submit a Small Business subcontracting plan

In negotiated procurements, each solicitation expected to exceed \$750K (\$1.5M for construction) that has subcontracting possibilities require the bidder selected for award to submit of a small business subcontracting plan

- FAR Section 19.702(a)(1)

Since a subcontracting plan is only required from the apparently successful offeror(s), nothing is done with the plan during source selection, i.e., it is not “evaluated”

- To clearly distinguish between evaluating small business participation (next section of this presentation) and what happens with a subcontracting plan, subcontracting plans are to be “assessed” for acceptability or the need to be negotiated
- So, we assess subcontracting plans and evaluate small business participation

Small Business Subcontracting Plan

Each subcontracting plan shall include...

Separate percentage goals for using SBs, VOSBs, SDVOSBs, HUBZones, SDBs, and WOSBs

A statement of the total dollars planned to be subcontracted and total dollars planned to be subcontracted to SBs

A description of the principal types of supplies and services to be subcontracted and an identification of types planned for SB subcontracting

A description of the method used to develop the subcontracting goals

A description of the method used to identify potential sources for solicitation purposes

The name of the individual employed by the offeror who will administer the offeror's subcontracting program

A description of the offeror's efforts to ensure that various SB concerns have an equitable opportunity to compete for subcontracts

- FAR Sections 19.704(a), 52.219-9

Assessing Small Business Subcontracting Plans

Consider the contractor's compliance with previous subcontracting plans

Notify the SBA representative of the opportunity to review the proposed contract

Ensure an acceptable plan is incorporated into the awarded contract

- FAR Section 19.705-5(a)

Small Business Participation Plans

For solicitations that are **not set aside for small business concerns**, involving consolidation or bundling, that offer a significant opportunity for subcontracting, the contracting officer shall include a factor to evaluate past performance indicating the extent to which the offeror attained applicable goal for small business participation under contracts that required subcontracting plans

- FAR Section 15.304 (c) (3) (ii)
 - Note: For DoD, consolidation or bundling is not a requirement, other than LPTA, a SB Participation Plan is required (part of the technical evaluation, identification and commitment to small business performance on the contract) – some DoD COs will call the plan a “Small Business Participation Commitment Document” to avoid confusion with a Small Business Subcontracting Plan
 - DFARS 215.304 (c)
- And...the contracting officer shall include proposed small business subcontracting participation in the subcontracting plan as an evaluation factor
 - FAR Section 15.304 (c) (4)
- Note: If a small business is submitting as a Prime, they also submit a SB Participation plan indicating the extent to which small business participation (including their own role) will occur in furtherance of performance of the contract.
 - A Small Business Participation Plan permits a small business concern to submit its own participation as a prime under the socio-economic evaluation factor

A SB subcontracting goal (a percentage of a percentage) is calculated much differently than a SB participation goal (based on total contract value)

Evaluating Small Business Participation Plans

Agencies may consider...

The extent to which SBs are specifically identified (firms listed by name as part of the offeror's team)

The extent of commitment to SBs (enforceable agreements can be weighted more than non-enforceable ones)

The complexity and variety of the work SBs are to perform; (identify what scope elements the SBs are responsible for)

The realism of the proposal (how will goals be attained?)

Past performance of offeror's compliance with subcontracting plan goals

The extent of participation of SBs in terms of the value of the total acquisition

Assessing Subcontracting Plans & Evaluating Small Business Participation

The differences

SB Subcontracting Plan (Requirements/Assessment)	SB <u>Participation</u> Evaluation (Requirements / Evaluation)
FAR 19.7	FAR 15.304, DFARS 215.304
Must be negotiated and determined acceptable by the Contracting Officer	Solicitation establishes requirements and evaluation criteria for SB participation
Must have 15 elements defined in FAR 52.219-9 *(DFARS 252.219-9 Deviation 2016 O0009)	Evaluation conducted IAW solicitation evaluation criteria
Required for all Federal contracts (subject to dollar limitations and exceptions) and includes both negotiated and sealed bidding	Required only for bundled contracts or certain DoD negotiated acquisitions
Does not apply to small businesses	Applies to all businesses
Based on total planned subcontracting dollars	Based on total contract value (TCV) (dollars)

Socio-Economic Evaluation Schemes

Pass/Fail (with a mandatory minimum)

Adjectival Ratings with a mandatory minimum

Adjectival Ratings without a mandatory minimum

Other alternatives:

- Make small-business subcontracting an award fee criterion as part of a CPAF contract
- Consider small business subcontracting as part of CPARS

Common Agency Evaluation Mistakes

Making evaluation scheme too complex

Making the socio-economic proposal submission more burdensome of the Small Business Subcontracting Plan & Small Business Participation Plan

Ignoring red flags in offerors' proposals

Not understanding the difference between small business subcontracting plans and small business participation plans

Common Contractor Mistakes

Not complaining about the “grounds rules” for the procurement in a timely manner

Not understanding the difference between small business subcontracting plans (SBSP) and small business participation plans (SBPP)

Failing to support the realism of your subcontracting goals

Additional Suggested Self-Study

Responsibility Determinations/Certificates of Competency

Set-aside (total, partial) decisions

Tiered/Cascading set-asides

NAICS Code determinations

Choosing the correct set aside (e.g., HUBZone vs. SDVOSB)

SDVOSB/VOSB certification process

Contract bundling issues (SBA, CICA)

Randolph-Sheppard Act

Buy American Act (BAA)

Trade Agreements Act (TAA)

Cybersecurity Maturity Model Certification (CMMC)

DD-2345 (Militarily Critical Technical Data Agreement, re: Space & Military CUI)

Contact

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Richard “Rick A to Z” Agopsowicz

CorVantage, LLC. Executive Vice President, Program Execution



“Rick A to Z” leads CorVantage Program Execution of client strategies and programs to achieve their Business Objectives through Market Analysis, Pipeline and Business Development, Capture, Negotiations, and Public Sector Program Execution.

Professional Experience:

“A to Z” has over 45 total years of Government and Industry experience in operations and government acquisition across R&D and operational programs, complex program management, systems development engineering, Information Assurance, Information Operations/Cyber Development & Special Technical Operations, and business capture.

During his preceding 30-year career with the U.S. Air Force, he held positions from B-52 operational squadron level up to that of Director at the Air Force Information Warfare Center. He has spent 20+ years as an industry senior executive working with over 50 clients winning and executing programs. This includes leading over 170 campaigns across 42 Federal Agencies and 17 State & Local Governments as well as commercial business-to-business. He has worked in defense, homeland security, intelligence, Special Operations, energy, health and human services, biotechnology & life sciences, IT/telecommunications, and transportation.

“A to Z” is actively involved in the Professional Services Council, Washington Homeland Security Roundtable, Coast Guard Industry Academy Alumni Association, University advisory boards, and Technology Incubators & Accelerators. He is a guest lecturer at Defense Acquisition University DAWIA Senior Program Management and Contracting Officer courses. He also is a professional educator in Accessing Government non-dilutive R&D Funding, Source Selection Evaluation, Innovative Contracting, DoD Adaptive Acquisition Framework, and Best Practices in Business & Capture Leadership with George Mason University, Public Contracting Institute, and Federal Publications Seminars as well as directly with CORTAC Clients.

About CorVantage, LLC. For more than 14 years, our team has worked together providing proven leadership to help our clients succeed in Business Expansion & Capture, and Public Sector Program execution. We bring a team of seasoned professionals which have demonstrated success and a commitment to foster a collaborative team environment. Our team leaders have an average of more than 25 years of experience capturing and managing multi-billion-dollar projects.

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Selected Previous Experience

EVP, Business Capture & Program Sector Execution, CORTAC Group, Inc.

Managing Director, Business Development, Robbins-Gioia, LLC.

Senior Vice President, Capture Practice, Steven Myers & Associates

Director, US Air Force Information Warfare Center (AFIWC/RM), and Technical Director, Advanced Programs “Skunk Works”

Planner and operational lead conducting special operations in support of SOCOM, EUCOM, CENTCOM, LANTCOM, Intelligence Community, and UK MOD

Conceptualized, organized, and led the development & employment of National level capabilities during Desert Storm Joint Force Component/Task Force Activities

Program Manager, Air Force Information Systems Security Research & Development

B-52 Squadron and Wing Combat Crew Flight Instructor (Defensive Air tactics, techniques, and procedures) and Combat Crew Training School Flight Instructor

Strategic Air Command, 1st Combat Evaluation Group, COMBAT SKYSPOT instructor, as well as assigned to multiple 1CEVG Sites

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