



September 21, 2026

Ryan Lambert, Associate Administrator
Office of Government Contracting and Business Development
U.S. Small Business Administration
409 Third Street SW
Washington, D.C. 20416

RE: Small Business Size Standards, RIN 3245-AI67, Docket No. SBA-2026-0199, 91 Fed. Reg. 53,741 (Aug. 20, 2026)

Dear Associate Administrator Lambert:

The National Small Business Association (NSBA) submits these comments in response to the proposed rule captioned above and, to the extent it bears directly on the proposed standards, the companion methodology notice published the same day. NSBA is the nation's oldest small business advocacy organization, representing more than 65,000 members across every state and industry sector. For nearly nine decades, NSBA has served as a nonpartisan voice for the small business community before Congress, the Executive Branch, and federal agencies, supporting efforts that foster the growth, strength, and impact of small businesses.

NSBA does not oppose periodic revision of size standards. Standards that are too low can trap growing firms and deny capable companies access to capital and contracting opportunity. NSBA supports raising standards where the evidence supports it, and has supported such increases before. NSBA cannot support a rule that removes every ceiling, discards the revenue test in 173 industries and 6 subindustry exceptions, and collapses two thirds of the table on a justification the statute does not contemplate. NSBA opposes this rule because of how far it goes, how it was constructed, and what the record does not show.

The proposal would add 114,541 firms to the population classified as small.¹ Among them are 37,002 firms that hold federal contracts, accounting for 105,655 contracts worth more than \$71 billion in fiscal year 2025.² That figure is equivalent to roughly 40% of the approximately \$179 billion in federal prime contract dollars awarded to small businesses in the same year.³ The statutory small business contracting goal remains 23% of prime contract dollars. The pool of eligible competitors increases significantly while the pool of dollars set aside for them does not.

¹ 91 Fed. Reg. at 53,770.

² 91 Fed. Reg. at 53,771.

³ SBA, Fiscal Year 2025 Small Business Procurement Scorecard

SBA understands this. The proposal states that the small businesses who fall under current size standards are likely to face greater competition from the newly eligible firms, and that increased competition may result in reduced profits as more small businesses compete for federal contracts. Inherently, small businesses under the current size standards do not always have the resources for advanced capture capabilities compared to the 114,541 newly small firms, making it even more difficult for them to compete and grow. Further, those same firms, which NSBA represents, rarely have the capacity for staff to track and properly respond to a rule this impactful, especially within a fast-tracked 30-day comment period.

NSBA asks the SBA not to finalize this rule in its current form.

I. The Proposal Enlarges the Pool of Eligible Firms Without Enlarging the Opportunity

SBA estimates that the total population of small firms would rise from 6,344,967 to 6,459,508.⁴ In the federal marketplace 37,002 firms holding \$71 billion in existing contracts would newly count toward small business goaling. Three consequences from this drastic increase will follow. First, agencies will find it materially easier to meet set-aside statutory goals without changing behavior, because contracts already being performed by firms that are not small today will begin to count tomorrow. The goal becomes less a measure of effort and more an artifact of reclassification.

Second, the firms newly entering the small business pool are inherently larger than the firms already in it, bringing established past performance, larger bonding capacity, larger indirect rate bases, and dedicated capture and proposal staff. In a best-value competition, those advantages are highly impactful on outcomes and lessen the opportunities for small, just as impactful firms, to grow.

Third, SBA's own numbers show where the newly eligible contract holders concentrate. Six of the top twenty 6-digit codes by newly eligible firms with existing fiscal year 2025 contracts are in the 541 professional services series, led by Engineering Services with 5,314 firms, Other Computer Related Services with 2,247, and Custom Computer Programming Services with 2,171.⁵ This is not a broadly distributed rule.

SBA's response to the dilution concern rests on a single study of 977 federal suppliers observed from 2005 through 2014.⁶

⁴ 91 Fed. Reg. at 53,771.

⁵ 91 Fed. Reg. at 53,771.

⁶ 91 Fed. Reg. at 53,772-73.

The observation window closed twelve years ago, before the consolidation of the federal services market and the growth of governmentwide acquisition vehicles. Further, SBA's own description concedes the survivorship problem: many firms exited the federal market, and the doubling of those firm's contract activity SBA cites describes only the firms that remained. An outdated study of a fundamentally different ecosystem that only studies survivors cannot establish that dilution is harmless to the firms that did not survive.

NSBA also objects to how the SBA characterizes harm. The redistribution of contract awards among small businesses appears in the rule's "Transfer Impact" discussion rather than as a cost.⁷ Circular A-4 does not permit an agency to avoid analyzing a distributional effect by labeling it a transfer.⁸ The firms on the losing side of this transfer are the constituency the Small Business Act exists to protect.

II. SBA Applied Its Methodology in One Direction Only

SBA states that its analytics support a reduced size standard in 45 industry groups or industries, but then proposes not to reduce any industry size standard, even in those 45.⁹ A few examples of where the deviation is significant include Electric Power Generation, Transmission and Distribution, where the methodology recommends 700 employees while SBA proposes 1,150; Natural Gas Distribution, where it recommends 500 while SBA proposes 1,150; and Pesticide, Fertilizer, and Other Agricultural Chemical Manufacturing, where it recommends 600 while SBA proposes 1,350.

A methodology that is honored when it raises thresholds and disregarded when it lowers them is merely supplying justification for a predetermined direction. If the methodology is sound enough to support increases across hundreds of industries, it is sound enough to support decreases in 45. If it is not reliable enough to support decreases, SBA should explain why it is reliable enough to support increases.

This is a longstanding pattern and SBA has reported that across the first two five-year reviews it decreased only three size standards out of more than 1,000.¹⁰ A ratchet that has moved in one direction for fifteen years, and that SBA now proposes to disengage entirely at the upper end, warrants a reasoned explanation that the record does not contain.

⁷ 91 Fed. Reg. at 53,772.

⁸ Office of Mgmt. & Budget, Circular A-4, Regulatory Analysis (Nov. 9, 2023)

⁹ 91 Fed. Reg. at 53,743-44.

¹⁰ 91 Fed. Reg. at 54,100.

III. Eliminating Every Maximum, Combined with a Productivity Adjustment Applied Between Reviews, Allows Standards to Rise Indefinitely

The clearest statement of what this rule does appears in SBA's own comparison table. Currently, the baseline maximum is \$47 million for revenue-based standards and 1,500 employees for employee-based standards. The proposed entry is "No maximum."¹¹ SBA retains minimums of 500 employees and \$30.6 million, but does not retain a ceiling of any kind.¹²

The consequences are visible in the proposed table. Computer Systems Design and Related Services (NAICS 5415) is set at \$531 million, which exceeds SBA's own stated high anchor point of \$500 million.¹³ Other Financial Investment Activities (NAICS 5239) is set at \$1,011 million, Depository Credit Intermediation (NAICS 5221) is set at \$5,031 million in assets, and Software Publishers (NAICS 5132) is set at 3,600 employees.¹⁴

Measured across the whole table, the average receipts-based standard rises from approximately \$24.7 million to approximately \$223.2 million, and the average employee-based standard rises from approximately 834 to approximately 1,348.¹⁵

Layered on top is a productivity adjustment applied to monetary-based standards. SBA acknowledges that it has not previously adjusted size standards for productivity growth in the economy, and states that it may apply the adjustment between the five-year reviews as necessary.¹⁶ NSBA objects to that mechanism on process grounds independent of its magnitude. A standard that can be raised administratively between review cycles, with no ceiling above it, can grow without the public ever having an opportunity to comment on the increase.

SBA's stated rationale is that employment-based standards carry an implicit productivity adjustment, so monetary-based standards should be placed on equal footing. That argument, taken seriously, proves the opposite of what SBA concludes. If headcount already absorbs productivity growth without adjustment, then adding an explicit productivity adjustment to receipts while simultaneously removing all ceilings means neither measure is anchored to anything.

¹¹ 91 Fed. Reg. at 53,769 (table, "Baseline and Proposed Changes").

¹² 91 Fed. Reg. at 54,148.

¹³ 91 Fed. Reg. at 54,149.

¹⁴ 91 Fed. Reg. at 53,776-84.

¹⁵ NSBA Analysis of SBA's current and proposed tables, described *supra*. Averages are unweighted means across all standards stated in each measure.

¹⁶ 91 Fed. Reg. at 54,146-48.

IV. Consolidating 995 Standards into 338 Is in Tension with the Statute

The proposal reduces the table from SBA's stated 995 size standards, or 996 by NSBA's count as discussed in Part VI.B below, to 338, set at 276 four-digit industry groups and 62 five-digit industries, and eliminates all 18 existing federal contracting exceptions.¹⁷ Two statutory provisions bear directly on this.

First, 15 U.S.C 632(a)(8) directs that the Administrator shall not limit the number of size standards and shall assign the appropriate size standard to each NAICS code. Congress added that provision in 2013 to constrain exactly this kind of consolidation.¹⁸ Reducing the table by roughly two-thirds is difficult to reconcile with a direction not to limit the number of standards.

Second, 15 U.S.C 632(a)(7) permits a single size standard for a grouping of four-digit NAICS codes only if the Administrator makes publicly available a justification demonstrating that the standard is appropriate for each individual industry classification included in the grouping.¹⁹ SBA's justification is a two-part structural test: whether the United States, Canada, and Mexico agree on the industry definition at the four-digit level, and whether the NAICS manual's cross-references form a complete graph among the constituent five-digit industries.²⁰

Neither criterion measures what the statute asks about. Whether three national statistical agencies agree on a definition says nothing about whether a firm in one constituent industry competes with a firm in another. Whether the NAICS manual cross-references two industries reflects editorial decisions made by the Office of Management and Budget for statistical purposes. Congress asked for a demonstration that a single standard is appropriate for each individual industry. A test of the classification manual's internal structure is not that demonstration.

The practical effect is that a narrowly specialized firm is now measured against the largest subsector in its group. NSBA's analysis of SBA's own tables identifies increases of a magnitude that consolidation alone explains: Independent Artists, Writers, and Performers rises from \$9 million to \$651 million; Bed-and-Breakfast Inns from \$9 million to \$503 million; Custom Computer Programming Services from \$34 million to \$531 million.²¹ Firms in those industries did not become larger. They were placed in larger groups.

¹⁷ 91 Fed. Reg. at 54,103.

¹⁸ 15 U.S.C. 632(a)(8); see also National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, sec. 1661, 126 Stat. 1632 (2013).

¹⁹ 15 U.S.C. 632(a)(7).

²⁰ 91 Fed. Reg. at 54,120-29.

²¹ NSBA analysis comparing SBA's Table of Small Business Size Standards Effective March 17, 2023 (data.sba.gov, dataset SBA-GCBD-2014-08-001) against the proposed table at 91 Fed. Reg. 53,776-84. NSBA mapped each current six-digit industry to the proposed standard covering it, using the proposed five-digit standard where one exists and the four-digit industry group otherwise.

The elimination of all 18 exceptions compounds this.²² The exceptions exist because SBA previously determined, industry by industry, that certain subindustries compete in distinct markets. SBA does not explain what changed about those markets, only that the new framework has no place for exceptions.

V. Converting 173 Industries and 6 Subindustry Exceptions from Receipts to Headcount Penalizes Labor-Intensive Firms

SBA proposes to default to employment-based standards wherever it has discretion, retaining receipts-based standards largely where the statute requires them. Both counts fall because the table itself contracts by roughly two thirds, but they fall at very different rates: receipts-based standards drop from 496 to 129, a decline of about 74%, while employee-based standards drop from 478 to 208, a decline of about 56%. The employee-based share of the table rises from roughly half to roughly three fifths.²³ SBA states that 64 industry groups transition from receipts to employment, plus six from a mixed basis.²⁴ At the current six-digit level, NSBA's analysis shows that 173 industries and 6 subindustry exceptions lose the revenue test entirely.²⁵

A headcount test rewards firms that substitute capital and technology for labor and penalizes firms that hire. That is an odd outcome for a statute whose purpose is to preserve and expand small business and the employment it generates, and SBA nowhere addresses it.

The methodology makes the omission explicit. In distinguishing service industries from others, SBA states that regardless of the magnitude of the labor investment in the industry, the focus is on the contract and the product provided to the customer.²⁶ Labor intensity is excluded from the test by design, and then headcount is adopted as the measure of size.

Construction is the clearest illustration. All 31 current construction industries and 2 subindustry exceptions in NAICS Sector 23 change measures.²⁷ New Single-Family Housing Construction moves from \$45 million in receipts to 550 employees; Commercial and Institutional Building Construction from \$45 million to 600 employees; Highway, Street, and Bridge Construction from \$45 million to 700 employees; Electrical Contractors and Plumbing, Heating, and Air-Conditioning Contractors from \$19 million to 550 employees each.

²² 91 Fed. Reg. at 54,129.

²³ 91 Fed. Reg. at 53,769 (table, "Baseline and Proposed Changes").

²⁴ 91 Fed. Reg. at 54,139.

²⁵ NSBA analysis of SBA's current and proposed tables, described supra.

²⁶ 91 Fed. Reg. at 54,139.

²⁷ NSBA analysis of SBA's current and proposed tables, described supra.

Two contractors with identical revenue will now land on opposite sides of the line based solely on whether they self-perform with their own crews or subcontract. The self-performing contractor, which employs more Americans, is the one more likely to lose small business status.

SBA's volatility rationale does not justify the change. Congress already addressed receipts volatility by extending the averaging period for services from three years to five.²⁸ SBA does not explain why five-year averaging is insufficient, nor why the narrower remedy of a longer averaging window was rejected in favor of abandoning the revenue test across 173 industries and 6 subindustry exceptions. Likewise, SBA's cost-of-living argument, illustrated by the difference in receipts per employee between restaurants in Manhattan, New York and Manhattan, Kansas, is an argument for regional adjustment. It is not an argument for discarding receipts as a measure.

Where the measure converts and the threshold is high, the results are difficult to defend. Software Publishers moves from a \$47 million receipts test to a 3,600-employee test with no revenue component. A publicly traded software company reporting 898 employees and approximately \$5.5 billion in fiscal year 2025 revenue would appear to satisfy that test with roughly three quarters of the threshold unused.²⁹ Whatever the Small Business Act was meant to accomplish, it was not this.

NSBA notes finally that the statutory definition of a small business concern has three elements: independent ownership and operation, not dominant in its field of operation, and meeting the applicable size standard.³⁰ A measure that permits a firm with billions in annual revenue to satisfy the third element does not serve the first two.

VI. Internal Inconsistencies, Data Limitations, and Procedural Concerns in the Record

NSBA identifies the following discrepancies and gaps. Each is capable of correction, and several go to whether the public can meaningfully evaluate what SBA has proposed.

A. The firm counts do not reconcile.

SBA states a net increase of about 114,541 firms classified as small.³¹ Elsewhere SBA states that about 114,236 firms would gain small status and fewer than 200 would lose it.³²

²⁸ Small Business Runway Extension Act of 2018, Pub. L. No. 115-324, 132 Stat. 4444; see also 13 C.F.R. 121.104(c).

²⁹ AppLovin Corp., Annual Report (Form 10-K) (reporting 898 employees as of Dec. 31, 2025, and revenue of \$5.48 billion for fiscal year 2025). Publicly reported trailing twelve-month revenue as of mid-2026 was approximately \$6.8 billion. NSBA offers this example as illustrative; actual eligibility in any procurement would depend on the NAICS code assigned by the contracting officer under 13 C.F.R. 121.402, the 24-month employee average, and the affiliation rules at 13 C.F.R. 121.103.

³⁰ 15 U.S.C. 632(a)(1).

³¹ 91 Fed. Reg. at 53,770.

³² 91 Fed. Reg. at 53,772.

A net increase cannot exceed the gross gain less the losses. The arithmetic does not close, and because 114,541 is the figure SBA uses throughout the economic analysis, the discrepancy should be resolved on the record rather than in the final rule's preamble alone. NSBA's row-by-row summation of SBA's comparison table yields gross gains of 114,544 firms and gross losses of three, netting to exactly 114,541. The single industry losing firms is NAICS 524126, Direct Property and Casualty Insurance Carriers, which declines by three. SBA's line-item data therefore contradicts both the 114,236 gross figure and the statement that fewer than 200 firms would lose small status.

B. The count of current standards is stated two different ways.

The proposed rule describes the current table as 978 NAICS industries plus 18 subindustries, which totals 996.³³ The methodology notice describes the current table as 995 size standards.³⁴ Separately, the proposed states that 27 employee-based size levels cover 477 industries, while the comparison table states 478. NSBA's reconstruction of the current table yields 478 employee-based industries and five employee-based subindustries, matching the comparison table rather than the preamble.³⁵ NSBA's own reconstruction of the current table yields 996 rows, of which 509 are receipts-based, 483 are employee-based including the refining-capacity standard at NAICS 324110, and four are asset based.³⁶

C. SBA rejects, without explanation, a methodology it adopted after notice and comment in 2024.

In rejecting an alternative approach, SBA describes the current methodology white paper published in 2024 as “notably flawed.”³⁷ That is the entirety of the explanation. SBA proposed revisions to the methodology in December 2023, considered public comments, published its responses, adopted the revised methodology on September 12, 2024, and stated at the time that it would apply the revised methodology to the forthcoming third five-year review.³⁸ SBA then applied it in an August 2025 proposed rule. This rule is that third five-year review, and it discards the methodology SBA committed to it.

Stakeholders participated in the 2023 and 2024 proceedings in reliance on SBA's representation. An agency that changes course must display awareness that it is doing so and must supply a reasoned explanation. A two-word characterization does not meet that standard.

³³ 91 Fed. Reg. at 53,742.

³⁴ 91 Fed. Reg. at 54,103.

³⁵ 91 Fed. Reg. at 53,769 (table, "Baseline and Proposed Changes").

³⁶ NSBA analysis of SBA's current and proposed tables, described supra.

³⁷ 91 Fed. Reg. at 53,773

³⁸ Small Business Size Standards: Notification of Adoption of the Revised Size Standards Methodology, 89 Fed. Reg. 74,109 (Sept. 12, 2024); see also 88 Fed. Reg. 85,852 (Dec. 11, 2023); 84 Fed. Reg. 14,587 (Apr. 11, 2019) (prior methodology).

NSBA requests that SBA identify, specifically, the flaws it has found in the 2024 methodology, and respond to the comments it received and answered in that earlier proceeding.

D. The status of the August 2025 proposed rule is unclear.

SBA published a proposed rule on August 22, 2025 revising monetary-based size standards using the 2024 methodology, with a comment period that closed October 21, 2025.³⁹ NSBA is unable to determine from the present record whether that proceeding has been withdrawn, superseded, or remains pending. If it remains open, SBA has two overlapping rulemakings addressing the same subject matter under incompatible methodologies, and commenters cannot know which framework governs.

E. The operative tables are published only as page images.

The revised table of size standards and current-versus-proposed comparison table are published as scanned page images with no extractable text layer in any published format, and no machine-readable version appears in the docket.⁴⁰ Section 632(a)(6) requires SBA to make publicly available, as part of the notice of proposed rulemaking, the approach used to develop the proposed standard, the source of all data, and the anticipated effect on each industry.⁴¹

Publishing 34 pages of tabular data in a form that cannot be searched, sorted, or verified without manual transcription is in considerable tension with that obligation, particularly within a comment period of approximately 30 days. NSBA transcribed that table in order to prepare these comments - the public, and resource limited small businesses should not have to.

F. SBA acknowledges that the data underlying its contracting analysis is unreliable.

In a footnote to the contracting impact analysis, SBA states that the review relies on self-reported SAM.gov data and that much of the revenue and employee data is outdated or inaccurate, with the potential that more firms would be affected.⁴² That caveat undermines the 37,002-firm and \$71 billion figures on which the economic analysis rests, and it bears with particular force on receipts-based determinations, since receipts are the self-reported field in question.

³⁹ Small Business Size Standards, 90 Fed. Reg. (proposed Aug. 22, 2025).

⁴⁰ The proposed table at 91 Fed. Reg. 53,776-84 and the comparison table at 91 Fed. Reg. 53,745-69 are published as page images (graphics EP20AU26.040 through EP20AU26.048 and EP20AU26.015 through EP20AU26.039, respectively). Neither carries an extractable text layer in the Federal Register HTML, the govinfo HTML, or the govinfo PDF. As of the date of these comments, Regulations.gov listed no supporting documents for Docket No. SBA-2026-0199.

⁴¹ 15 U.S.C. 632(a)(6)(C)-(D).

⁴² 91 Fed. Reg. at 53,771 n.20.

G. Core inputs rest on aged data.

The net imports adjustment, one of only three factors in the new methodology, relies on 2017 import and export data. The geographic market calculation relies on commuting flows from the 2016 through 2020 American Community Survey.⁴³ A framework that reduces seven factors to three should be supported by current data in each of the three.

H. The significance determination is difficult to reconcile with the rule's own findings.

SBA states that OMB has determined the rule is not a significant regulatory action, that any impact on the economy is expected to be de minimis, and that the rule is anticipated to be a deregulatory action under Executive Order 14192.⁴⁴

A rule that by SBA's own estimate reallocates eligibility for more than \$71 billion in existing federal contract value, and reclassifies 114,541 firms, is not de minimis. NSBA requests that SBA revisit the determination or explain how both statements can be true.

I. The record does not show that the statutory public forums were held.

The Small Business Jobs Act requires SBA to conduct a detailed review of not less than one-third of size standards during each 18-month period, which shall include holding not less than two public forums located in different geographic regions of the United States.⁴⁵

NSBA has not identified, in the proposed rule or the accompanying docket, any statement that such forums were held in connection with this review. If they were held, SBA should say when and where, and summarize what was heard. If they were not, SBA should hold them before finalizing.

⁴³ 91 Fed. Reg. at 54,105-12.

⁴⁴ 91 Fed. Reg. at 53,774.

⁴⁵ Small Business Jobs Act of 2010, Pub. L. No. 111-240, sec. 1344(a), 124 Stat. 2504, 2544; see 91 Fed. Reg. at 54,098.

VII. Requested Actions

1. Do not finalize the rule as proposed. At minimum, extend the comment period by 60 days and publish the proposed and comparison tables in machine-readable form so the public can verify SBA's analysis.
2. Reinstate a ceiling on size standards. If SBA believes the prior \$47 million and 1,500-employee maximums were too low, it should propose specific higher maximums and take comment on them, rather than eliminate the concept of a maximum. SBA should also consider pairing any ceiling with a mechanism that does not penalize firms for growing, since a fixed threshold gives a firm approaching it a reason to stay below it rather than expand. A time-based approach is one such option, under which a firm's eligibility runs for a defined period and growth during that period does not cost it status.
3. Subject any productivity adjustment to notice and comment. Remove the provision permitting SBA to apply the adjustment between the statutory five-year reviews.
4. Apply the methodology symmetrically or explain why not. If SBA declines to adopt the reductions its methodology produced in 45 industries, it should state the basis for that decision on the record.
5. Provide the industry-by-industry justification that 15 U.S.C. 632(a)(7) requires for each four-digit grouping, based on competitive analysis rather than the structure of the NAICS manual.
6. Retain receipts-based standards where conversion to headcount would penalize labor-intensive firms, and at a minimum retain them throughout NAICS Sector 23. Provide industry-specific analysis of labor intensity before converting any industry.
7. Reconcile the firm counts and the counts of current standards, and publish corrected figures with an opportunity to comment on them.
8. Identify the specific flaws SBA has found in the 2024 methodology, and respond to the comments SBA received and answered in that proceeding.
9. State the disposition of the August 2025 proposed rule.
10. Adopt protections for the smallest firms within enlarged groupings, such as reserving a portion of set-aside awards for firms below a defined fraction of the applicable standard, so that consolidation does not displace the businesses the Small Business Act was written to serve.

VIII. Conclusion

Federal contract obligations reached approximately \$793 billion in fiscal year 2025.⁴⁶ Small businesses received approximately \$179 billion in prime contract awards, which SBA reports as nearly 28 percent of small-business-eligible dollars.⁴⁷ The question this rule presents is not whether size standards should be updated. It is who the small business programs are for. A firm with 898 employees and \$5.5 billion in revenue competing for set-aside work against a 40-person engineering firm is not the competition Congress contemplated when it directed that small business concerns receive a fair proportion of federal contracts.

NSBA supports raising standards where the evidence supports it, and has supported such increases before. NSBA cannot support a rule that removes every ceiling, discards the revenue test in 173 industries and 6 subindustry exceptions, collapses two thirds of the table on a justification the statute does not contemplate, and rests on a record that does not reconcile with itself. NSBA urges SBA to reconsider.⁴⁸

NSBA appreciates the opportunity to comment and is prepared to meet with SBA staff to discuss any of the points raised here. Please direct any questions to NSBA's government affairs staff, Jack Furth, at jfurth@nsbaadvocate.org.

Respectfully,

Todd McCracken
President & CEO
National Small Business Association
1156 15th Street NW, Suite 1100
Washington, D.C. 20005

⁴⁶ U.S. Gov't Accountability Off., Federal Contracting: Snapshot of Government-Wide Contracting for FY 2025.

⁴⁷ SBA, Fiscal Year 2025 Small Business Procurement Scorecard.

⁴⁸ National Defense Authorization Act for Fiscal Year 2017, Pub. L. No. 114-328, sec. 1831, 130 Stat. 2000 (2016).