THE WOLVERINE GROUP
Federal Acquisition Analytics

SBA Size Standard Rulemaking — Docket SBA-2026-0199
Companion methodology docket SBA-2026-0265 — comments close September 21, 2026

User Guide

NAICS Size Standard
Impact Tool

Everything needed to run the tool, from pulling the data to filing a comment.

IN ONE PARAGRAPH.

You download a spending file from USAspending, open the tool in a web browser, and drop the file in. The tool finds the companies whose small-business status would change if a size standard moves, shows how each of them has been winning work, and produces a spreadsheet, a verification form, and a draft comment to SBA. Nothing is installed, nothing is uploaded, and no account is required.

Where to find it	
The tool	https://jaimegracia2821.github.io/SBA-Size-Standard-Tool/
Source and documentation	https://github.com/jaimegracia2821/SBA-Size-Standard-Tool

PART 1 • WHAT THE TOOL DOES, AND WHAT IT DOES NOT

When SBA changes a size standard, some companies that are too large to count as small today become small, and a smaller number move the other way. This tool finds the companies whose status would change, using public federal contract data, and characterizes how they compete today.

It works on any NAICS code and any pair of thresholds. It is pre-loaded for the August 2026 proposed rule affecting management consulting, but nothing about the analysis is tied to that rule.

THE LIMITATION THAT GOVERNS EVERYTHING ELSE.

The tool measures federal prime contract dollars. Size standards are based on total company receipts from all sources over five fiscal years, with affiliates included (13 CFR 121.104). Commercial revenue, subcontract revenue, and affiliate revenue are not in this data at all.

A company can therefore look small in this output and be well over the threshold in fact. What you get is a ranked list of candidates worth investigating. It is not a determination of who is small and must never be presented as one.

PART 2 • WHAT YOU NEED BEFORE YOU START

Three things: a spending file, the NAICS codes you care about, and two dollar thresholds. The tool supplies the thresholds where it already has them.

B.1 Downloading the spending file

Go to USAspending.gov, then Award Search, then Advanced Search. Use Download and choose Custom Award Data. Set these filters:

Filter	What to choose
Award type	Contracts
File type	Prime Award Transactions
NAICS	The code or codes you are analyzing
Date range	Five full federal fiscal years

THE FILE TYPE MATTERS MORE THAN ANYTHING ELSE ON THAT PAGE.

The summaries file gives one row per award. The tool needs one row per contract action with its own date, because it sorts money by when it was obligated. Choose the wrong file and the results are wrong in ways that are hard to notice. The tool checks and will tell you if you picked the summaries.

A federal fiscal year runs October 1 through September 30, so five full years ending with FY2025 means 2020-10-01 through 2025-09-30. Five years is not arbitrary — it is the averaging period the regulation uses. A shorter window answers a different question, and the tool will warn you if your file falls short.

You will get a ZIP. Hand over the whole ZIP without unpacking it; the tool picks the right file from inside. These files are large — one NAICS code across five years came to roughly 240,000 rows — so use a desktop browser rather than a phone.

B.2 The two thresholds

Every analysis needs the current size standard for your codes and the proposed one. You do not have to find these yourself where the tool already carries them. Where it does not, it stops and names the code rather than guessing, and the value is loaded from a sourced standards file before the run.

> **WHY THE TOOL REFUSES TO GUESS.**
>
> Codes that look closely related often carry different standards. Within the management consulting group alone the current figures range from $19.0 million to $29.0 million. A wrong threshold does not produce an obvious error; it produces a plausible-looking list of the wrong companies. Every standard loaded into the tool must carry a stated source, and entries without one are rejected.

One case the tool cannot handle at all: some NAICS codes measure size by number of employees rather than revenue. Spending data contains no headcount, so there is no honest answer to give and the tool says so instead of producing one.

PART 3 • RUNNING THE ANALYSIS

Open the tool in a desktop browser and work through four steps down the left side. There is nothing to install and no account to create.

- Load your data. Drop in the ZIP or the CSV from inside it. The tool reports how many contract actions it found, which NAICS codes are present, and the date range covered. Check that line against what you meant to pull — it is the cheapest error to catch.
- Set scope and standards. Uncheck any code you do not want. Confirm the thresholds and the settings below.
- Run. A progress bar tracks the read. A large file takes a minute or two. Keep the tab open.
- Review the results and download what you need.

YOUR DATA NEVER LEAVES YOUR COMPUTER.

The file is read inside the browser and nothing is transmitted anywhere. That means the tool can be used with sensitive pipeline data, and it means nobody but you holds a copy of what you analyzed. Closing the tab discards everything.

C.1 The settings that change the answer

Setting	Default	What it controls
NAICS codes	Everything in your file	Uncheck any code you do not want included.
Current standard	Filled in where known	What counts as small today, per code.
Proposed standard	Filled in where known	The figure under the rule being analyzed.
Fiscal years to average	Five	Matches 13 CFR 121.104. Changing it changes who appears.
Defense reporting delay	Cut off 90 days back	Defense actions publish 90 days late.
Combine company identifiers	On	Merges companies appearing under several identifiers.

LEAVE THE COMBINING SWITCH ON.

Large firms operate under many separate identifiers. Without combining them their revenue fragments and they appear inside the band when their combined total is well above it. In one real run a major consulting firm showed up at $140 million under one identifier; combined it was $740 million and nowhere near the band. Every merge is listed in the workbook for review.

PART 4 • READING THE RESULTS

On screen you get a summary, a sanity check against SBA's own published count where one exists, and a table of the companies in the band. Three things are worth reading closely.

- Unrestricted share. The portion of a company's work won through open competition. A company at or near 100 percent has never had to win a set-aside and would be entering that pool for the first time. This is usually the most significant finding in a run.
- Confidence rating. LOW means many identifiers, unusually concentrated awards, or other conditions that make the estimate unreliable. The largest firms are usually the least reliable, because they carry the most revenue this data cannot see.

- The sanity check. Where SBA has published its own count for a code, the tool compares against it. Your cohort should be a small subset. If it is larger, something is wrong with company identification and you should stop.

D.1 What you can download

Download	What it holds
Full workbook (.xlsx)	Seven tabs. Start_Here carries the run parameters and the disclaimer; Validation carries the checks; then the cohort, the competition split, the reporting-lag ledger, code diagnostics, and the list of combined companies
Cohort list (.csv)	Just the companies in the band, for a CRM or another tool
Verification checklist (.docx)	A sign-off form covering every figure the run produced
Comment draft (.docx)	An unbranded draft comment to SBA, described in section F

Read the Validation tab before using any number from the workbook. It records the settings the run used and flags anything that looks wrong.

PART 5 • VERIFYING THE FIGURES

One bad figure causes everything around it to be discounted. The checklist exists to catch that before it reaches a client or a docket.

It lists every figure the run produced with a checkbox, a space for the value you independently read from the source, and a space for initials. It closes with pre-publication statements and two signature lines.

TWO PEOPLE MUST SIGN, AND THEY MUST BE DIFFERENT PEOPLE.

The reviewer enters the value they read from the source document, not the value already printed on the form. A figure that does not match is a stop, because it means either the run was misread or the source was. Self-verification defeats the purpose of the exercise.

PART 6 • DRAFTING A COMMENT TO SBA

Agencies must respond to significant comments. Sentiment is not significant; a position backed by data is. The tool drafts a comment built around your own figures and produces an unbranded Word document with no header, footer, or styling, so it pastes cleanly into your own letterhead.

THE TOOL TAKES NO POSITION ON THE RULE.

The analysis engine measures; it does not argue. You choose your position — oppose the increase, support it, support it with modifications, or take no position and submit the data alone — and the argument sections are written to whichever you pick. Section 3, which reports what the award record shows, is identical under every position, because the measurement does not change with your view of it.

Choose your position, then enter your company type, receipts, employees, NAICS code, years in the federal market, and any set-aside figure from your own records. The draft runs to roughly 700 to 1,000 words depending on the position, across five sections: your standing and stake; the treatment of the 45 industries where SBA's own analysis supported a decrease; what the award record shows in your market; the fact that the methodology and the standards derived from it share one comment period; and what you ask SBA to do, written as regulatory text it could adopt.

It runs entirely in your browser. No account, no sign-in, nothing sent anywhere.

READ IT, THEN REWRITE SECTIONS 2 AND 4 IN YOUR OWN WORDS.

Those two sections argue from the rulemaking record, so every filer choosing the same position will produce similar text, and agencies discount identical submissions as a form campaign. Sections 1, 3 and 5 are built from your own figures and are already specific to you. The comment is filed under your name and states your position, not the position of whoever built the tool. Do not file anything you would not have written.

The tool independently scans the draft and flags any number that does not trace to your authorized figures. Anything flagged appears on screen and as a notice at the top of the document so it cannot be filed by accident. If you would rather have an AI rewrite the draft in your own voice, copy the prompt — it already contains your figures and the instruction to cite nothing else.

Comments on Docket SBA-2026-0199 close September 21, 2026. Check the docket for current status before relying on that date.

PART 7 • CAUTIONS BEFORE YOU PUBLISH ANYTHING

- Confirm every threshold against the 13 CFR 121.201 table. Some figures shipped with the tool came from secondary sources and are labeled as such in the output.
- Name the averaging window whenever you publish a count. A different window produces a materially different list of companies even when the total barely moves.
- Review the list of combined companies. Name matching is a heuristic and two unrelated firms can share a name stem. Check the short names and any group combining four or more identifiers.
- Carry the confidence ratings through to anything client-facing.
- Record the run date. The spending database backfills continuously, so the same query run two months apart returns different answers for the same period. Undated output cannot be reproduced or defended.
- Check the Diagnostics tab on any new NAICS code. Codes the tool has not seen are set aside and reported rather than silently misfiled.

A PROPOSAL IS NOT THE LAW.

Current size standards govern until a final rule takes effect. Nothing from this tool should be used to advise anyone to change a SAM representation, re-certify, or alter a bid strategy on the assumption that a proposed standard will be adopted as drafted. Proposed rules are routinely changed or withdrawn.

PART 8 • KNOWN LIMITATIONS

- Employee-based size standards cannot be analyzed. Spending data contains no headcount.
- Subcontract revenue is absent, which understates firms working largely as subcontractors.
- Obligations are recorded at award while revenue is earned over the performance period, so year-to-year figures are lumpier than actual revenue.
- Company identification depends on the parent identifier in the source data, which is incomplete, and on name matching, which is imperfect.
- The tool cannot reach the spending database directly. It works only from the file you give it, which is also why it never sees anything you do not provide.
- Very large files are limited by your computer’s memory rather than by the tool.
- Two enrichment fields are placeholders pending a connection to the federal registration system.

PART 9 • IF SOMETHING GOES WRONG

What you see	What it means
No transactions file in that ZIP	You downloaded award summaries. Re-download choosing Prime Award Transactions.
Missing required columns	The file is not a transactions extract. Check the download options and try again.
A warning that your data covers fewer than five years	Your date range is short. The missing years count as zero and will understate every company. Re-download with a wider range.
Cannot run, size standards unresolved	The NAICS code has no threshold on file yet. It must be sourced from 13 CFR 121.201 and loaded before the run.
Unmapped codes on the Diagnostics tab	Values the tool has not seen. Check the dollars involved before relying on the competition split.
The sanity check reports a failure	The cohort is larger than the population it should be a subset of. Usually a company identification problem.
Downloads do nothing	The tool is running inside an embedded frame, which browsers block downloads from. Open it at its own web address instead, and the downloads will work normally.
A 404 or page-not-found error	The web address is wrong. It is case-sensitive — check the capital letters.
Figures flagged in the comment draft	A number in the draft does not trace to your authorized list. Source it or remove it before filing.