

Attachment J-9

Master Small Business Subcontracting Plan

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**Master Small Business Subcontracting Plan for
Idaho Environmental Coalition LLC**

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Small Business Subcontracting Plan

DATE: July 28, 2020

COMPANY NAME: Idaho Environmental Coalition LLC (IEC)

SUBCONTRACTING PLAN CONTACT: Darin Williams

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SOLICITATION OR CONTRACT NUMBER: 89303319REM000034

SOLICITATION OR CONTRACT NAME: Idaho Cleanup Project (ICP)

Small Business Subcontracting Goal Percentages

This small business subcontracting plan, together with any attachments, is submitted to satisfy the applicable requirements of Public Law 95-507, FAR Clause 52.219-9 entitled “Small Business Subcontracting Plan” and FAR guidance found at 19.704 Subcontracting Plan Requirements.

1. **(Refer to FAR 52.219-9(d)(1)).** Idaho Environmental Coalition LLC (IEC) identifies small business subcontracting commitments at the Task Order level associated with the contract awarded under the solicitation cited above. Percentages, as stated in RFP Section H.51, are committed in the following six categories as aligned to Task Order scope. These goals are contingent on the contract providing subcontracting opportunities.
 - i. **Small Business Concerns:** Subcontractors who are small business concerns (Alaska Native Corporations [ANC] or Indian tribe shall be counted toward the subcontracting goals for small business concerns, regardless of the size or Small Business Association [SBA] certification status of the ANC or Indian tribe)
 - 45% of total planned subcontracting dollars
 - ii. **Veteran-Owned Small Business Concerns:** Veteran-owned small business concerns will be reported as a subset of small business concerns.
 - 3% of total planned subcontracting dollars
 - iii. **Service-Disabled Veteran-Owned Small Business Concerns:** Service-disabled veteran-owned small business concerns will be reported as a subset of veteran- owned small business concerns and small business concerns.
 - 3% of total planned subcontracting dollars
 - iv. **Historically Underutilized Business Zone (HUBZone) Small Business Concerns:** HUBZone small business concerns will be reported as a subset of small business concerns.
 - 3% of total planned subcontracting dollars
 - v. **Small Disadvantaged Business Concerns:** Subcontractors who are small business concerns owned and controlled by socially and economically disadvantaged individuals (ANC or Indian tribe shall be counted toward the subcontracting goals for small disadvantaged business concerns, regardless of the size or SBA certification status of the ANC or Indian tribe) will be reported as a subset of small business concerns.
 - 5% of total planned subcontracting dollars
 - vi. **Women-Owned Small Business Concerns:** Women-owned small business concerns will be reported as a subset of small business concerns.
 - 5% of total planned subcontracting dollars

Small Business Subcontracting Goal Dollars

2. IEC awards small business subcontracting dollars corresponding to the percentage goals shown in 1 above. As part of Task Order negotiations, IEC records the Task Order dollar value and cumulative dollar value for each small business category. Small Business goals will be listed for each Task Order in the following format in Exhibit 1-7:

Exhibit 1-7. Total Estimated Subcontracting Dollars: \$XX		
Small Business Category	Small Business Goals	Small Business Dollars
Small Business	xx.x%	\$XX
Veteran-Owned Small Business (VOSB)	xx.x%	\$XX
Service-Disabled Veteran-Owned Small Business (SDVOSB)	xx.x%	\$XX
Historically Under-Utilized Business Zone (HUBZone)	xx.x%	\$XX
Small Disadvantaged Business (SDB)	xx.x%	\$XX
Woman-Owned Small Business (WOSB)	xx.x%	\$XX

Anticipated Subcontracting Opportunities

3. (Refer to FAR 52.219-9(d)(3)). Although the list may change as the performance work statement (PWS) and subcontracting opportunities are defined, IEC anticipates subcontracting as follows in Exhibit 1-8.

Exhibit 1-8. PWS								
Firm	Services	SB	VOSB	SDVOSB	HUBZone	SDB	WOSB	LB
Spectra Tech*	C.7.2.01 – Management of NRC-Licensed SNF Storage Facilities	●						
Navarro*	Closing RWMC; monitor groundwater; waste management characterization and waste acceptance prior to waste generation; nuclear safety	●					●	
ORT*	PWS 7.1.01-7.1.04, 7.2, 7.3	●				●	●	
Sunroc Construction	Construction/Excavation Services	●						
Huffaker	Construction	●						
Desert Peak	Construction	●						
L&L Mechanical	Facility Maintenance	●					●	
Wheeler Electric	Facility Maintenance	●						
J Foster Associates	Nuclear Safety Support	●				●	●	
HukariAscendent	Nuclear Safety Support	●	●	●				
Walsh Engineering	Engineering	●						
Eagle Rock Specialties	Engineering/General Supplies	●						
Western States	Equipment Rental							●
United Rental	Equipment Rental							●
Sunbelt	Equipment Rental							●
Dale Huffaker	Excavation	●						
Tacoma Screw Products	General Supplies	●						
4Alarm Restoration	Facility Maintenance	●	●	●				
Marcom	Waste Management	●					●	
Sundance Consulting	Waste Management	●					●	
Moxie Endeavors, Inc.	Waste Management	●			●		●	
Porters Office	Office Supplies	●						
Lynx Supply	Personal Protective Equipment	●					●	

Exhibit 1-8. PWS								
Firm	Services	SB	VOSB	SDVOSB	HUBZone	SDB	WOSB	LB
Veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns will be reported as a subset of small business concerns. Service-disabled veteran-owned small business concerns will be reported as a subset of veteran-owned small business concerns. *Subcontractors with teaming agreements guaranteeing scope opportunities.								

Small Business Goal Methodology

4. (Refer to FAR 52.219-9(d)(4)). The following method was used to develop the subcontracting goals listed in 1:
 - IEC will conduct all major subcontracting on this project, committing to afford small business concerns with the maximum extent practical opportunity to participate in Task Orders over the life of the contract. Our methodology is first based on DOE’s suggested goals that are stated in the solicitation, and secondly, on our IEC parent companies’ experience and historical performance on our federal projects, including the Department of Energy contracts. The goals developed are challenging yet realistic. Due to the fact that this is an indefinite delivery order contract in which the specific PWS will be outlined in subsequently issued delivery/task orders, the review for additional subcontracting opportunities will be ongoing. The subcontract requirements will be redefined if it is in the Government’s best interest to increase or decrease the scope or capacity of this contract. Our subcontracting approach emphasizes the utilization and integration of our team subcontractors (all small businesses) for the delivery of PWS requirements. We will commit to award subcontracts to small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns if the contract provides subcontracting opportunities and technically qualified, reasonably priced small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns are available.

Identifying Potential Sources

5. (Refer to FAR 52.219-9(d)(5)). IEC uses numerous methods to identify small business concerns prior to subcontracting with large business concerns. The following list is in priority order by the methods used to locate small business concerns. In the event we are unsuccessful in identifying sources from our web-based database, we use each subsequent step, or concurrent multiple steps, until we obtain a sufficient number of qualified small business concerns. IEC’s capabilities to identify qualified, local, high- performing small businesses are enhanced through the inclusion of NWP as a minority LLC member. NWP has been an active member of the Idaho Falls small business community for more than 27 years, having performed more than \$680M in work at Idaho National Laboratory (INL). NWP currently subcontracts with 64 small business entities at INL and brings comprehensive knowledge of potential small business sources to IEC.
 - i. Existing company source lists (including IEC Majority Partner parent company Jacobs’ e-portal and NWP’s list of current and former area SB subcontractors)
 - ii. Post-award IEC small business protégé firms and existing and former Jacobs’ small business protégé firms
 - iii. Checking the SBA's Dynamic Small Business Search (DSBS) and General Service Administration’s SAM sourcing systems

- iv. Expanding source lists by encouraging vendors who make direct inquiries with IEC to register in the DSBS and SAM, as well as retrieving and reviewing the vendors' brochures when a DSBS and SAM search matches them to a subcontracting opportunity
- v. Accessing the list of qualified HUBZone small business concerns maintained by the SBA
- vi. Accessing the list of veteran-owned and service-disabled veteran-owned small business concerns maintained by the U.S. Department of Veterans Affairs
- vii. Checking the SBA's directory of 8(a)-certified firms, and consulting the NAFEO/DOD Survey that inventories the capabilities of HBCU/MIs for sources
- viii. Establishing and maintaining contact with DOE's Small Business Liaison and the local SBA office
- ix. Making inquiries with local contacts, chambers and professional-organization members, such as the Small Business Development Center, Minority Business Development Agency, the National Contract Management Association, and Institute for Supply Management
- x. Advertising in SBA's Sub-Net, trade journals, and newspapers
- xi. Participating in local small business conferences

Indirect Cost

6. **(Refer to FAR 52.219-9(d)(6)).** Indirect costs were not used in establishing goals in this small business subcontracting plan.

Small Business Subcontracting Plan Administration

7. **(Refer to FAR 52.219-9(d)(7)).** The Contractor Administrator, Debra Hickman and Program Manager, Ty Blackford, will administer this small business subcontracting plan in partnership with Jacobs' Small Business Liaison Officer, Darin Williams. NWP will provide administration support from Idaho Falls.
 - i. The Contract Administrator's and Program Manager's specific responsibilities include:
 - a. Monitoring the small business subcontracting plan goal progress
 - b. Identifying potential sources for solicitation purposes through the methods outlined in 5 above
 - c. Assuring small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns have an equitable opportunity to compete for subcontracts as indicated in 8 below
 - d. Participating in early procurement planning to ensure that equitable opportunities are identified for the small business community
 - e. Interfacing with client SADBUs and co-sponsoring small business trade fairs and conferences
 - f. Participating in bidder conferences and training sessions to the small business community
 - g. Including the clause "Utilization of Small Business Concerns" in subcontracts, as outlined in 9 below
 - h. Prior to awarding a subcontract requiring a small business subcontracting plan, reviewing and approving the subcontractor's small business

subcontracting plan in cooperation with the firm's Small Business Liaison Officer, Darin Williams, 600 William Northern Blvd., Tullahoma, TN 37388, Tel: 610.238.1009.

- i. Ensuring subcontractors with small business subcontracting plans submit periodic reports needed to monitor the plans
 - j. Cooperating with the firm's Small Business Liaison Officer in the timely completion and submission of Standard Forms 294 and 295, or Individual Subcontract Report (ISR) and Summary Subcontract Report (SSR) via the Electronic Subcontract Reporting System (eSRS)
 - k. Completing and submitting other reports, studies and surveys noted in 10 below
 - l. Participation in and maintenance of documentation of outreach and solicitation activities that support the plan as detailed in 11 and 12 below
- ii. IEC's Small Business Liaison Officer's responsibilities include:
- a. Ensure compliance with IEC's company policy and commitment to Government public laws and regulations
 - b. Develop programs and initiatives to establish partnering relationships with the small business community and HBCU/Mis
 - c. Provide the maximum opportunity to small business concerns to participate and bid on Federal procurements
 - d. Monitor, report, and review performance relative to contractual subcontracting requirements (small business subcontracting plans, and SF 294/295 or ISR/SSR Reports)
 - e. Conduct training and provide assistance to project teams to identify, develop, and manage project opportunities with small business concerns
 - f. Participate in outreach and solicitation activities that support IEC's Small Business Program and individual small business subcontracting plans
 - g. Provide instructions via IEC's external website on "How to do business with IEC"
 - h. Provide the small business community with a method to raise concerns, ask questions, or report violations 24 hours a day, 7 days a week, 365 days a year by phone or online via a third party, independent, web-based incident reporting system

Equitable Subcontracting Opportunities

8. **(Refer to FAR 52.219-9(d)(8)).** IEC will strive to provide equitable subcontracting opportunities for small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns through:
- i. Contacts with qualified small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns identified through the methods outlined in 5 above
 - ii. Ensuring competition by structuring subcontracts to allow the largest number of qualified small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns to compete

- iii. Educating Program/Project Managers about their Federal socio-economic responsibilities and tracking their performance in meeting the subcontracting goals established in this small business subcontracting plan

Flow-Down Requirements

9. **(Refer to FAR 52.219-9(d)(9)).** To meet the contract flow-down requirements, the clause titled "Utilization of Small Business Concerns" will be included in all subcontracts that offer further subcontracting opportunities. In addition, all subcontractors (except small business concerns) who receive subcontracts in excess of \$700,000 (\$1,500,000 for construction) will be required to adopt a small business subcontracting plan similar to IEC's plan.

Reports, Studies, and Surveys

10. **(Refer to FAR 52.219-9(d)(10)).** IEC will:
 - i. Cooperate in any studies or surveys as may be required
 - ii. Submit periodic reports so the Government can determine the extent of IEC's compliance with the small business subcontracting plan
 - iii. Include subcontracting data for each order when reporting subcontracting achievements for indefinite-delivery, indefinite-quantity contracts intended for use by multiple agencies
 - iv. Submit ISR and/or SSR via eSRS in accordance with the applicable instructions. The reports shall provide information on subcontract awards to small (including ANCs and Indian tribes that are not small business concerns), veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged (including ANCs and Indian tribes that have not been certified by SBA as small disadvantaged business concerns), and women-owned small business concerns, and HBCU/MIs. Reporting shall be in accordance with this clause, or as provided in agency regulations.
 - v. Ensure that subcontractors with small business subcontracting plans agree to submit the ISR and/or the SSR via eSRS
 - vi. Provide its prime contract number, DUNS number, and the email address of the IEC official responsible for acknowledging receipt of or rejecting the ISR, to all first-tier subcontractors with small business subcontracting plans so they can enter this information into eSRS when submitting their ISRs
 - vii. Require that each subcontractor with a small business subcontracting plan provide the prime contract number, its own DUNS number, and the email address of the subcontractor's official responsible for acknowledging receipt of or rejecting the ISRs, to its subcontractors with small business subcontracting plans

Documentation

11. **(Refer to FAR 52.219-9(d)(11)).** IEC will maintain the following records to demonstrate that procedures have been adopted to comply with the requirements and goals of this small business subcontracting plan:
 - i. Source lists, guides, and other data that identify small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns

- ii. Organizations contacted in an attempt to locate sources that are small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged or women-owned small business concerns
- iii. Records on each subcontract solicitation resulting in an award of more than \$150,000 indicating: a) whether small business concerns were solicited, and, if not, why not; b) whether veteran-owned small business concerns were solicited, and, if not, why not; c) whether service-disabled veteran-owned small business concerns were solicited, and, if not, why not; d) whether HUBZone small business concerns were solicited, and, if not, why not; e) whether small disadvantaged business concerns were solicited, and, if not, why not; f) whether women-owned small business concerns were solicited, and, if not, why not; and g) if applicable, the reason the award was not made to a small business concern
- iv. Records of any outreach efforts to contact a) trade associations; b) business development organizations; c) conferences and trade fairs to locate small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns; and d) veterans service organizations
- v. Records of internal guidance and encouragement provided to Program/Project Managers and procurement professionals through a) workshops, seminars, training, etc.; and b) monitoring performance to evaluate compliance with the program's requirements
- vi. On a contract-by-contract basis, records to support award data including the name, address, and business size of each subcontractor

Good Faith Effort

12. **(Refer to FAR 52.219-9(d)(12)).** IEC will make a good faith effort to acquire articles, equipment, supplies, services, or materials, or obtain the performance of construction work from the small business concern(s) that we used in preparing the bid or proposal, in the same or greater scope, amount, and quality used in preparing and submitting the bid or proposal. Responding to a request for a quote does not constitute use in preparing a bid or proposal. IEC understands that the meaning of “used a small business concern in preparing the bid or proposal” applies if:

- i. IEC identifies the small business concern as a subcontractor in the bid or proposal or associated small business subcontracting plan, to furnish certain supplies or perform a portion of the contract; or
- ii. IEC used the small business concern’s pricing or cost information or technical expertise in preparing the bid or proposal, where there is written evidence of an intent or understanding that the small business concern will be awarded a subcontract for the related work if IEC is awarded the contract

Written Explanation(s)

13. **(Refer to FAR 52.219-9(d)(13)).** IEC will provide the contracting officer with a written explanation if we fail to acquire articles, equipment, supplies, services, or materials or obtain the performance of construction work from the small business concern(s) used in preparing the bid or proposal. This written explanation will be submitted to the contracting officer within 30 days of contract completion.

Subcontractor Non-Prohibition

14. **(Refer to FAR 52.219-9(d)(14)).** IEC will not prohibit a subcontractor from discussing with the contracting officer any material matter pertaining to payment to or utilization of a subcontractor.

Payment of Subcontracts

15. **(Refer to FAR 52.219-9(d)(15)).** IEC will pay its small business subcontractors on time and in accordance with the terms and conditions of the underlying subcontract and notify the contracting officer when IEC makes either a reduced or an untimely payment to a small business subcontractor.

Small Business Subcontracting Plan Implementation

16. IEC will perform the following functions to implement this small business subcontracting plan to the extent consistent with contract performance:
- i. Assist small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns by arranging solicitations, time for preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns. IEC will make reasonable efforts to give as many small business concerns as possible an opportunity to compete over a period of time. NWP will leverage local SB knowledge and experience as an SB to ensure the local SB community has the opportunities and assistance necessary to compete for subcontracting opportunities.
 - ii. Provide adequate and timely consideration of the potentialities of small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns when deciding if IEC should perform the work or procure it from another source.
 - iii. Counsel and discuss subcontracting opportunities with representatives of small, veteran-owned small, service-disabled veteran-owned small, HUBZone small, small disadvantaged and women-owned small business concerns.
 - iv. Confirm that a subcontractor representing itself as a HUBZone small business concern is certified by the SBA as a HUBZone small business concern by accessing the SAM database or by contacting the SBA.
 - v. Provide notice to subcontractors concerning penalties and remedies for misrepresentations of business status as a small, veteran-owned small, HUBZone small, small disadvantaged or women-owned small business concern for the purpose of obtaining a subcontract that is to be included as part or all of a goal contained in this small business subcontracting plan.
 - vi. For all competitive subcontracts over the simplified acquisition threshold in which a small business concern received a small business preference, upon determination of the successful subcontract offeror, IEC will inform each unsuccessful small business subcontract offeror in writing of the name and location of the apparent successful offeror prior to award of the subcontract.

Exhibit 1-9. Signatures		
IEC Contract Administrator	Jacobs Corporate Small Business Liaison Officer	Contracting Officer
Debra Hickman <Signature> <Date>	Darin Williams <Signature> <Date>	<Name> <Signature> <Date>