

PART III – LIST OF DOCUMENTS, EXHIBITS AND OTHER ATTACHMENTS

SECTION J – LIST OF ATTACHMENTS

**ATTACHMENT J-10 CONTRACTOR’S SMALL BUSINESS SUBCONTRACTING
PLAN**



L.6(G) SMALL BUSINESS SUBCONTRACTING PLAN

INDIVIDUAL SMALL BUSINESS SUBCONTRACTING PLAN

Date: December 24, 2019
 Contractor: Fluor Idaho, LLC
 Address: 1580 Sawtelle Street
 Idaho Falls, ID 83402
 Solicitation: DE-SOL-0007097
 IDAHO CLEANUP PROJECT (ICP) CORE

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1. CORPORATE COMMITMENT

The Small Business Program for Fluor Idaho is a highly structured and organized program, combining best practices and successes from the project history of Fluor Corporation and its subsidiaries. The Small Business Program staff maintains a dynamic SB Outreach Program, continually augmenting Fluor’s supplier and subcontractor sources and databases, and managing relationships with SB, small disadvantaged businesses [including Alaska Native Corporations/Native American concerns] (SDB), woman-owned small businesses (WOSB), HUB Zone small businesses (HUBZ), veteran-owned small businesses (VOSB), and service-disabled veteran-owned small businesses (SDVOSB) concerns.

For more than four decades, Fluor has served United States government agencies by executing challenging projects worldwide. Throughout that time, Fluor has maintained a strategically focused Small Business Program. Fluor’s record of supporting SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB concerns is exemplary.

During the last five years, Fluor has awarded \$4 billion to SBs on our federal government contracts, totaling 56% of total U.S. dollars awarded. On Department of Energy contracts alone, Fluor awarded \$2.5 billion during that time, totaling 57% of total subcontract dollars. As shown in **Figure L.6(g)-1**, Fluor has consistently exceeded DOE’s subcontracting goals.

Categories	2010	2011	2012	2013	2014	DOE 2015 Subcontracting Goals
SB	56%	53%	66%	67%	65%	50%
SDB	16%	15%	15%	15%	15%	5%
WOSB	17%	17%	20%	19%	16%	5%
HUBZ	4%	4%	10%	7%	3%	3%
VOSB	5%	4%	9%	7%	9%	Not Identified
SDVOSB	4%	4%	4%	5%	6%	3%

For the past 5 years, Fluor has consistently exceeded DOE SB subcontracting goals.

RECENT CORPORATE-WIDE AWARDS AND RECOGNITION

The small business and supplier diversity culture runs throughout our corporate operations and can be found in every entity and subsidiary and on every project. Commitment to supplier diversity and SB initiatives is evidenced by the awards depicted in **Figure L.6(g)-2**.

Award	Agency	Description
Momentum Award	Women Business Enterprise Southwest, 2014	This award was presented in recognition of ongoing support and commitment to women-owned businesses.
Best Corporations for Veteran-Owned Businesses	National Veteran-Owned Business Association (NaVOBA), 2014	We have been recognized as one of the top 10 corporations for use of veteran-owned companies on government projects.
Advocate of the Year Award	Houston Minority Supplier Development Council (HMSDC), 2013	The minority business owners nominate individuals who reflect the highest degree of commitment to the development of diverse businesses.
Corporate Procurement Award	Houston Minority Supplier Development Council (HMSDC), 2013	This annual award recognizes corporate members who reported the largest percentage increase in minority business expenditures during the previous year.
Corporation of the Year Award; Savannah River Nuclear Solutions (SRNS)	Carolinas Minority Supplier Development Council (CMSDC), 2012	This award is bestowed annually to the organization that demonstrates outstanding leadership in supplier diversity through its commitment to minority business enterprises, mentorship, and support of minority businesses.
Supplier Diversity Coordinator of the Year; SRNS	CMSDC, 2012	This award is bestowed annually by the CMSDC in recognition of efforts to leverage minority enterprises and develop a more diverse supplier base.

Our recent awards and recognition highlight our dedication and commitment to helping small businesses.

CLIENT RECOGNITION OF SB PERFORMANCE

The Fluor commitment to SB is demonstrated through customer reviews as evidence by our recent FY 2014 DOE Secretarial Small Business Award. Fluor B&W Portsmouth received the following commendation: *“I congratulate your company for being selected as DOE’s FY 2014 Facility Management Contractor Small Business Achievement of the Year award recipient.”* – John Hale III, Director, DOE Office of Small and Disadvantaged Business Utilization, April 23, 2015. **Figure L.6(g)-3** provides a snapshot of recent client comments.

Figure L.6(g)-3. Customer Comments	
<p>Portsmouth Gaseous Diffusion Plant (GDP) Project, Ohio</p> <p>On a recent CPAR for the Portsmouth project utilization of SB was rated as “excellent.” Contracting Officer Robert Bell stated, “... <i>acquisition program is developed around active small business involvement with a solicitation preference toward small business, small disadvantaged business, women and veteran owned businesses as well as involving local and regional businesses. ... performance against their small business plan reported through eSRS has been exceptional. ... reported total small business awards of 69.1 percent versus the goal of 50 percent. Through small business initiatives, ... recognizes that innovation often comes from people of diverse talents and experiences working together toward a common goal. They are committed to involving small businesses... and coordinating with the local community to facilitate future economic development.</i>”</p>	<p>Logistics Civil Augmentation Program (LOGCAP) IV, Afghanistan</p> <p>While supporting the U.S. Army on their LOGCAP IV sustainment contract in Afghanistan, we had challenging SB requirements. We have awarded more than \$1.7 billion to U.S. SBs on the project, and have consistently exceeded the overall SB goal of 15% of total contract dollars. In a 2012 Award Fee letter, the Award Fee Determining Official, Michael R. Hutchison, wrote: <i>“During this period, ... exceeded the Small Business Goal of 15% of total contract dollars by achieving 23.4%, and also achieving 11.4% for Veteran Owned Small Business, though this is not a requirement. The overall program surpassed \$1B. Fluor continued aggressive outreach to small businesses, adding 267 qualified suppliers, awarding 22 new small business contracts totaling \$86.7M...”</i></p>
<p>NAS Pensacola Base Operating Services, Florida</p> <p>Recognizing our 72.7% SB utilization, Contracting Officer, Kenny Makin, rated our utilization of SB as “exceptional” on a recent CPAR. An exceptional assessment, as defined on the report, indicates <i>“Performance meets contractual requirements and exceeds many to the Government’s benefit. The element being assessed was accomplished with few minor problems for which corrective actions taken by the contractor were highly effective.”</i></p>	<p>Savannah River Site Management & Operations, South Carolina</p> <p>During a review, DOE Contracting Officer James Lovett assessed the SB program initiatives by stating, <i>“The Contractor Small Business Program exceeded expectations, awarding 56% of available contracting dollars compared to a goal of 50%. The contractor Business Services was recognized by DOE-HQ for its world-class Mentor-Protégé Program presentation at a recent DOE Small Business Conference.”</i></p>

Our customers are a testament to our SB dedication and success.

2. METHOD USED TO DEVELOP SUBCONTRACTING GOALS

Fluor developed the proposed subcontracting goals for SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB concerns through detailed planning. We worked closely with the proposed ICP core project management team to evaluate the Performance Work Statement (PWS) and identify elements for subcontracting. Additional strategies employed included:

- Leveraged Fluor experience at various sites across the DOE Complex
- Reviewed like or similar projects for spending trends and SB participation
- Identified the requirement for goods and services, analyzing self-perform vs subcontract
- Identified potential SB sources
- Reviewed protégé firms, team members, and competitive pool of prequalified firms’ capabilities
- Searched Fluor corporate Supplier Contractor Registry, Fluor Government Group internal Small Business Program reference database, System for Award Management (SAM), Small Business Administration’s (SBA) Small Business Dynamic Search (SBDS) to determine availability of qualified small business firms

SMALL BUSINESS INTEGRATED PROCESS

Fluor maximizes opportunities for qualified SBs to compete for materials and services consistent with the efficient execution of the contract. We have established a sourcing methodology that gives priority to SB and incorporates a significant share of meaningful, varied, and complex work for SBs. As demonstrated in **Figure L.6(g)-4**, a key element of Fluor’s SB strategy is involvement of the project management team. This is accomplished by integrating SB goals and targets into project planning as well as execution. The goals depicted in this Subcontracting Plan have been developed using this methodology and is supported by our estimating process.



Fluor Idaho small business integration process.

Our commitment to the local community is evidenced by the success at our Portsmouth DOE facility. With a local and regional spend of \$259 million, Contracting Officer Robert Bell stated of Fluor, “They are **committed to involving small businesses...** and coordinating with the local community to facilitate future economic development.”

Through the SB integration process, Fluor has teamed with two Idaho SBs that bring considerable experience and expertise to the contract:

- North Wind, a local Idaho SDB(Alaska Native Corporation), will provide integrated support through provision of technical and professional resources predominately in CERCLA remediation, waste management, IWTU operations support, D&D, stakeholder relations, project controls, and ESH&QA.
- Portage, another local Idaho SB, will provide integrated support through provision of technical and professional resources predominately in CERCLA remediation, waste management, liquid waste facility closure, and ESH&QA.

Additionally, our SB subcontracting approach is focused on the utilization of local and regionally based SBs. This helps strengthen the local economy, and creates new business opportunities, immediately and in the longer term. For example Fluor has engaged two proven and experienced Idaho SBs to support us in preparing for the ICP Core mission. The companies are:

- Moxie Endeavors – waste management technical specialists on the Idaho site
- Communications Design, Inc. – a specialist in multi-media communication, technical imaging and scientific monitoring solutions

We anticipate they will continue in these roles as part of our SB subcontracting plan following contract award.

3. SUBCONTRACTING GOAL SUMMARY

Fluor has prepared this Small Business Subcontracting Plan for the ICP Core Contract by employing the methodology of the SB integration process and with an ongoing commitment to incorporate SBs to the maximum extent possible with efficient contract performance.

Figure L.6(g)-5 and L.6(g)-6 are developed and provided in accordance with the Subcontracting Plan guidelines found in FAR 52.219-9 and Section H.25.

Figure L.6(g)-5. Subcontracting Goals		
Business Type	Dollars Subcontracted	% Total Subcontracted
Total Subcontracted Dollars	\$448,816,176	
To Large Business (LB)	\$201,967,280	45%
To Small Business* (SB)	\$246,848,897	55%
To Small Disadvantaged Business* (SDB)	\$67,322,427	15%
To Woman-Owned Small Business (WOSB)	\$67,322,427	15%
To HUBZ Small Business (HUBZ)	\$13,464,485	3%
To Veteran-Owned Small Business (VOSB)	\$13,464,485	3%
To Service-Disabled Veteran-Owned Small Business (SDVOSB)	\$13,464,485	3%

*Including ANCs and Indian Tribes

Our ICP Core Contract SB goals reflect Fluor's ongoing commitment to excellence.

Figure L.6(g)-6. FY 20 Subcontracting Goals		
Business Type	Dollars Subcontracted	% Total Subcontracted
Total Subcontracted Dollars	\$104,000,000	
To Large Business (LB)	\$46,800,000	45%
To Small Business* (SB)	\$57,200,000	55%
To Small Disadvantaged Business* (SDB)	\$15,600,000	15%
To Woman-Owned Small Business (WOSB)	\$15,600,000	15%
To HUBZ Small Business (HUBZ)	\$3,120,000	3%
To Veteran-Owned Small Business (VOSB)	\$3,120,000	3%
To Service-Disabled Veteran-Owned Small Business (SDVOSB)	\$3,120,000	3%

*Including ANCs and Indian Tribes

4. DESCRIPTION OF PRINCIPAL TYPES OF SUPPLIES AND SERVICES TO BE SUBCONTRACTED

Fluor anticipates that the following products and services could be procured during execution of the ICP Core Contract. Fluor will work to provide opportunities to small businesses throughout the execution of the contract. The type of supplies and services expected to be subcontracted is shown below in Figure L.6(g)-7.

Figure L.6(g)-7. Subcontracting Supplies and Services						
Supplies and Services	SB*	SDB*	WOSB	HUBZ	VOSB	SDVOSB
D&D Support	✓	✓	✓		✓	
Management	✓	✓	✓			
Waste Management Support	✓	✓	✓			
Environmental / Remediation	✓	✓	✓			
Environmental Safety & Health Program	✓		✓		✓	✓
Engineering	✓	✓	✓	✓	✓	✓
Manufacturing	✓			✓		
Permitting	✓					
Regulatory Oversight and Strategic Planning	✓					
WIR Development & Support	✓					
Supplies	✓	✓	✓	✓	✓	✓
CERCLA Compliance		✓				

Figure L.6(g)-7. Subcontracting Supplies and Services

Supplies and Services	SB*	SDB*	WOSB	HUBZ	VOSB	SDVOSB
Radcon	✓					
Training	✓		✓			
Infrastructure	✓					
Analytical	✓		✓			
Administration	✓	✓	✓	✓		
Construction	✓	✓	✓	✓	✓	✓
Transportation	✓		✓			

*Including ANCs and Indian Tribes

Fluor has identified meaning work scope for SB opportunities in support of the ICP Core Contract.

5. METHOD USED TO IDENTIFY POTENTIAL SOURCES

Fluor employs various methods for identifying potential SB offerors, such as company source lists; attendance at various conferences and networking events; working with local SBA and Procurement Technical Assistance Center offices when appropriate; and searches in internal and external databases. This ensures a maximum number of SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB firms capable of providing the required supplies/services are considered.

INTERNAL EFFORTS

- Acquisition planning to include small business subcontracting opportunities
- Establishing, maintaining, and using small business source lists, guides, and other data for soliciting sources for subcontracts

OUTREACH INITIATIVES

- Ongoing outreach program to effectively implement the subcontracting plan
- Interaction to support the subcontracting plan with SBA, Small Business Development Centers, Procurement Technical Assistance Centers, Chambers of Commerce, and other organizations in the region that support small and diverse businesses
- Contacting sources from external databases such as SAM and SBA SBDS as well as other appropriate websites

6. INDIRECT AND OVERHEAD CHARGES

Indirect and overhead costs *have not* been included in the goals specified in this subcontracting plan.

7. SMALL BUSINESS PROGRAM ADMINISTRATOR

Name: Debra Sampson
 Title: Small Business Liaison Officer
 Address: 100 Fluor Daniel Drive, Greenville, SC 29607
 Telephone: 864.281.6034
 Email: debra.sampson@fluor.com

Fluor's Small Business Liaison Officer is responsible for monitoring performance relative to contractual subcontracting requirements contained in this plan. These responsibilities may be augmented by a SB Advocate assigned specifically to this project.

- Maintenance of a capabilities database of SB, SDB, WOSB, HUBZ, VOSB and SDVOSB concerns for compiling bidders lists
- Ensuring that procurement and contracting policies and procedures are structured to permit SB, SDB, WOSB, HUBZ, VOSB and SDVOSB concerns to participate to the maximum extent possible
- Promoting inclusion of SB, SDB, WOSB, HUBZ, VOSB and SDVOSB concerns in all solicitations for products or services for which they are capable of providing
- Monitoring solicitations to ensure statements, clauses, etc., which may tend to restrict or prohibit SB, SDB, WOSB, HUBZ, VOSB and SDVOSB participation are not included
- Ensuring periodic rotation of potential suppliers and subcontractors in internal capabilities database
- Conducting or arranging for the training of procurement and contracts personnel regarding the requirements of the subcontracting plan
- Attending or arranging for attendance of company counselors at SB outreach and networking events
- Monitoring attainment of proposed goals and recommending corrective action as necessary
- Preparing and submitting required subcontracting reports
- Coordinating Fluor's activities during the conducting of small business compliance reviews

If Fluor Idaho decides to change the person in this position, we will notify the contracting officer.

8. EQUAL OPPORTUNITY STATEMENT

It is Fluor's policy to comply with all government regulations and public law, including those concerning SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB concerns. It is an established Fluor policy that SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB concerns will have an equitable opportunity to compete for Fluor purchases consistent with the efficient performance of Fluor's business (reference Fluor Government Group Acquisition Manual Practices 620.400.000a1.1, Acquisition Manual Preamble; 620.400.000a1.4, Organization Roles and Responsibilities; 620.400.000a1.17, Socioeconomic/Small Business Programs; 620.400.000a2.13, Patent Rights, Data Rights & Copyrights; 620.400.000a3.4, Solicitations; 620.400.000a4.10, Requirements for CAS and FCCOM).

Other efforts to assure that SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB concerns will have an equitable opportunity to compete for subcontracts include but are not limited to:

- Viable programs have been established to effectively implement the SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB program. Program Managers as well as procurement and subcontracts personnel are kept informed and current through department reviews and on-going training.
- Access to databases and source lists of SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB are available to all procurement and contracting personnel.
- An explanation of the absence of SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB sources on any award over \$150,000 is noted in the award file.
- Fluor staff is available to assist in developing SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB concerns.
- Special payment terms may to be arranged if necessary for SB, SDB, WOSB, HUBZ, VOSB, and SDVOSB concerns.

9. SUBCONTRACTOR FLOW-DOWN REQUIREMENTS

The clause 52.219-8, Utilization of Small Business Concerns will be inserted in contracts offering further subcontracting opportunities when the amount is expected to exceed the simplified acquisition threshold unless it is a personal services contract or is being performed entirely outside of the U.S. and its outlying areas. Clause 52.219-9, Small Business Subcontracting Plan, shall be inserted in solicitations and contracts that offer further subcontracting opportunities (with the exception of those issued to small businesses) when the contract amount is expected to exceed \$650,000 (\$1,500,000 for construction) unless (a) the contract is for personal services or (b) the contract, together with all its subcontracts, is to be performed entirely outside of any State, territory, or possession of the United States, the District of Columbia, and the Commonwealth of Puerto Rico.

10. REPORTS AND SURVEYS

Fluor will provide periodic reports and cooperate in any studies or surveys as may be required by the contracting agency or other federal government agency in order to determine the extent of compliance with the subcontracting plan or SB, SDB, WOSB, HUBZ, VOSB and SDVOSB requirements in general.

Fluor will submit the Individual Subcontract Report (ISR) and the Summary Subcontract Report (SSR) using the Electronic Subcontracting Reporting System (eSRS), per the requirements set forth in FAR 52.219-9(l) and in accordance with the instructions provided in eSRS.

Fluor will ensure that its subcontractors, who are subject to Section 9 above, agree to submit the ISR and the SSR using the eSRS. Additionally, Fluor will provide to those subcontractors its prime contract number, DUNS number and email address of official responsible for acknowledging the reports.

11. RECORDS MAINTENANCE

During the progress of the project, a continuous documentation effort will be conducted to measure SB, SDB, WOSB, HUBZ, VOSB and SDVOSB participation. The following indicates the type of records that will be maintained:

- On each subcontract solicitation resulting in an award of more than \$150,000 indicating (a) whether SB, SDB, WOSB, HUBZ, VOSB and/or SDVOSB concerns were solicited and if not, why not and (b) if applicable, the reason the award was not made to a SB concern.
- Outreach efforts (such as attendance at small business conferences, etc.) undertaken to identify SB, SDB, WOSB, HUBZ, VOSB and SDVOSB concerns.
- Internal guidance and encouragement provided to procurement and contract administrators through (a) workshops, seminars, training, etc., and (b) monitoring performance to evaluate compliance with the program's requirements.
- Each individual/company desiring to provide material, supplies or services to FGG completes FGG "Seller/Contractor Representation and Certifications." This self-certification of business size is maintained in the purchase order/subcontract file. The self-certification of business size is a prerequisite to award of a purchase order or subcontract.

12. "SMALL BUSINESS FIRST" PHILOSOPHY

Fluor will adopt a "Small Business First" philosophy for the ICP core contract. Any new subcontract or material procurement requirement is first sourced through the SB community. If it is determined that the service or material cannot be procured through SB and meet efficient contract execution, only then is it acquired from a large business.



This "Small Business First" strategy has resulted in significant SB achievements and is evidenced by the \$2.5 billion awarded to SBs on DOE projects during the last five years.

13. SMALL BUSINESS COMMITMENT SUMMARY

The Small Business Program staff will prepare regular summary reports for Fluor's ICP contract management team detailing SB performance. This includes cumulative and period of performance evaluation thereby ensuring that the project's management remains cognizant of SB activities.

Drawing on our past performance executing subcontracting plans for projects of similar size, scope and complexity, Fluor is confident that adequate subcontracting opportunities exist to meet or exceed the subcontracting goals established.

DE-SOL-0007097
IDAHO CLEANUP PROJECT (ICP) CORE
SUBCONTRACTING PLAN SUBMITTED BY:

Signed: Jennifer Lloyd Date: 12/24/2019
Printed Name: Jennifer Lloyd
Title: Small Business Liaison

SUBCONTRACTING PLAN APPROVED BY:
Signed: J-Cate Date: 2/10/20
Printed Name: Jennifer Cate
Title: Contracting officer