U.S. Department of Energy

and

The Trustees of Princeton University

ATTACHMENT J.8

APPENDIX H

SMALL BUSINESS SUBCONTRACTING PLAN

Applicable to the Operation of
The Princeton Plasma Physics Laboratory

Contract No. DE-AC02-09CH11466

Modification No. 0229

Small Business Subcontracting Plan

CONTRACTOR:	The Trustees of Princeton University
ADDRESS:	Princeton, New Jersey 08544
CONTRACT NUMBER:	DE-AC02-09CH11466
ITEM/SERVICE:	Operation of Single-Purpose National Laboratory
TOTAL AMOUNT OF CONTRACT: (Including Options)	$619,402,234.43 (through Mod. 209)
PERIOD OF CONTRACT PERFORMANCE: (Day, Month, and Year)	10/01/2015—9/30/2016

Princeton University pledges a strong commitment to involving small and socioeconomically disadvantaged business concerns in the operation of the Princeton Plasma Physics Laboratory (PPPL). Princeton University supports the socioeconomic objectives of the U.S. Government and recognizes that diversity in subcontracting provides a vital link to the local community, strengthens the economy, and represents best business practices.

In keeping with the above commitment, Princeton University and the U.S. Department of Energy (DOE) have established the following Small Business Subcontracting Plan.

1. TYPE OF PLAN

This is an Individual Contract Plan, which covers the entire contract period (including option periods), applies to a specific contract, and has goals that are based on the Offeror's planned subcontracting in support of the specific contract (except that indirect costs incurred for common or joint purposes may be allocated on a prorated basis to the contract).

This Individual Contract Plan is for FY2016. PPPL's small business goals are set for each fiscal year of the Contract.

2. GOALS

PPPL has established separate dollar and percentage goals for Small Business (SB - including Alaska Native Corporations (ANC) and Indian Tribes), Small Disadvantaged Business (SDB), Women-Owned Small Business (WOSB), HUBZone Small Business (HUB), Veteran-Owned Small Business (VOB), and Service Disabled Veteran-Owned Small Business (SDVOB) concerns, as subcontractors, as specified in FAR 19.704.

Subcontracting goals for the six (6) small business concern categories are defined below.

a. The total estimated dollar value of all planned subcontracting (to all types of business concerns) under this contract is $52,795,000.

b. The following percentage goals (expressed in terms of a percentage of total planned subcontracting dollars) and associated dollars are applicable to the contract cited above and will be pursued on a best effort basis consistent with good commercial practices and best value assessments:

   i. Award 30% to Small Business (SB) concerns, estimated at $15,838,500;
   ii. Award 3% to Small Disadvantaged Businesses (SDB)/8(a) concerns, estimated at $1,583,850 (this percentage is included in the percentage shown under b(i) above as a subset);
   iii. Award 3% to Woman-Owned Small Business (WOB) concerns, estimated at $1,583,850 (this percentage is included in the percentage shown under b(i) above as a subset);
   iv. Award 1.8% to Historically Underutilized Small Business (HUB) concerns, estimated at $950,319 (this percentage is included in the percentage shown under b(i) above as a subset);
   v. Award 3% to Veteran-Owned Small Business (VOB) concerns, estimated at $1,583,850 (this percentage is included in the percentage shown under b(i) above as a subset); and
   vi. Award 1.8% to Service-Disabled Veteran-Owned (SDVOB) concerns, estimated at $950,319 (this percentage is included in the percentage shown under b(i) above as a subset).

c. Indirect costs have not been included in the dollar and percentage subcontracting goals stated above.

d. PPPL will ensure timely payment of amounts due pursuant to the terms of its subcontracts with the six small business concerns.

e. To achieve the above stated goals, PPPL will employ the following subcontracting strategies:

   i. Preference will be given to small business for purchases with an estimated value greater than $3,500, up to $150,000, where there is a reasonable expectation that offers are competitive as to price, quality, and delivery.
   ii. For awards in excess of $150,000, every effort will be made to utilize small business concerns.
   iii. To further facilitate the Small Business Program, PPPL will, without further sole source documentation to the file, utilize the option of making awards without competition: (1) for purchases valued up to $5,000 to small business concerns; or (2) for purchases up to $6.5 million for manufacturing and up to $4.0 million for

goods and services to registered SBA8(a) Pilot Program firms. PPPL shall assure that awards are to be made at fair market prices.

iv. PPPL will utilize HUBZone set-asides and sole source methodologies in the award of subcontracts provided the acquisition meets requirements of FAR 19.1305 and FAR 19.1306(a).

v. PPPL will utilize SDVOB set-asides and sole source methodologies in the award of subcontracts provided the acquisition meets requirements of FAR 19.1405 and FAR 19.1406(a).

vi. PPPL will continue to foster its long-term business relationship with Zenex Precision Products under the DOE Mentor-Protégé Program to the extent permitted by available resources, and in so doing, in accordance with the provisions of DEAR 919.70, award noncompetitive subcontracts, of any dollar value, to its Protégé, subject to the best commercial practices and procedures required by DEAR 970.4402-2(d). PPPL will also pursue DOE's approval of additional Mentor-Protégé Agreements with a small disadvantaged business machine shop and a small disadvantaged HUBZone provider of computer services and supplies.

vii. PPPL will utilize small business or small disadvantaged 8(a) set-asides in the award of all subcontracts for construction services with an estimated value less than $4.0 million.

viii. PPPL will employ, to the maximum extent practical, leveraged purchasing agreements awarded by the DOE Contractor Integrated Contractor Purchasing Team (ICPT) to small business, or those ICPT agreements which allow for the participation of small business partners as value added resellers.

ix. PPPL will issue single source awards to the protégés of official DOE approved Mentor-Protégé Agreements.

x. As a part of the White House Small Business initiative and at the invitation of the DOE-Office of Small Disadvantage Business Utilization (OSDBU), PPPL will attend the Department's Business Opportunity Sessions (BOS), if feasible.

xi. PPPL will continue to partner with DOE to meet these goals and further increase small business outreach.

xii. PPPL will continue to foster financial stimulation to small businesses by incorporating Net 15 payment terms in all awards to small businesses.

3. DESCRIPTION OF PRINCIPAL TYPES OF SUPPLIES AND SERVICES

The following is an estimate of the principal types of supplies and services to be subcontracted under this Contract, and an indication of the supplies and services planned for subcontracting to the six categories of small business and large business.

Subcontracted Supplies/Service	**SB**	**VOB**	**SDVOB**	**HUB**	**SDB**	**WOSB**	**LB**
Apple™ Computer Supplies	✓			✓	✓		
Building Automation							✓
Cafeteria Services							✓
Computer Hardware/Software	✓	✓	✓	✓	✓	✓	✓
Construction	✓	✓	✓	✓	✓	✓	
Diesel & Fuel Oil	✓			✓	✓	✓	
Electrical/Electronics	✓	✓	✓	✓	✓	✓	
Fabrications	✓		✓	✓	✓	✓	
Furniture & Fixtures	✓	✓	✓	✓	✓		
Janitorial Supplies	✓	✓	✓	✓	✓		
Laboratory Chemicals	✓		✓	✓	✓		
Medical Supplies							✓
Office Supplies	✓	✓	✓	✓	✓		
Optical Apparatus	✓						✓
Parcel Delivery Service	✓						✓
Safety Supplies	✓	✓	✓	✓	✓	✓	
Software Licenses	✓						✓
Super High Power Tetrode Vacuum Tubes							✓
Telecommunications	✓	✓					✓
Temporary Help Services	✓				✓	✓	✓
Vacuum Supplies	✓	✓	✓	✓	✓	✓	
Wire and Cable	✓		✓	✓	✓		

Note: The NAICS codes have not been included as the breath of work subcontracted would require an extensive listing. The Small Business Liaison Officer (SBLO) will work directly with the procurement staff to ensure solicitations of small businesses to the maximum extent possible.

4. PROGRAM ADMINISTRATOR

The Contractor's subcontracting program administrators are:

NAME:	Stanford Schoen
TITLE:	(Acting) Director of Procurement
ADDRESS:	P.O. Box 451, MS 12 James Forrestal Campus 100 Stellerator Drive Princeton, NJ 08543
TELEPHONE:	(609) 243-2443

NAME:	Arlene White
TITLE:	Supervising Procurement Specialist/Small Business Liaison Officer (SBLO)
ADDRESS:	P.O. Box 451, MS 12 James Forrestal Campus 100 Stellerator Drive Princeton, NJ 08543
TELEPHONE:	(609) 243-2080

Duties: The SBLO has general overall responsibility for the subcontracting program, i.e., developing, preparing, and executing subcontractor plans and monitoring performance relative to the requirements of this particular plan. These duties include, but are not limited to, the following activities:

a. Developing and promoting policy initiatives that demonstrate the support for awarding contracts and subcontracts to small business, small disadvantaged business, women-owned small business, HUBZone small business, veteran-owned small business, and service disabled veteran-owned small business and assure that small business, small disadvantaged business, women-owned small business, HUBZone small business concerns and service disabled veteran-owned small businesses are included in the services they are capable of providing;

b. Ensuring periodic rotation of potential subcontractors;

c. Ensuring that procurement "packages" are designed to permit the maximum possible participation of small business, small disadvantaged business, women-owned small business, HUBZone small business, veteran-owned small business, and service disabled veteran-owned small businesses within procurement policies and procedures;

d. Facilitating the utilization of various sources for the identification of small business, small disadvantaged business, women-owned small business, HUBZone small business,

veteran-owned small business, and service disabled veteran-owned small businesses such as Dynamic Small Business Search (DSBS), System for Award Management (SAM) and the facilities of local small business, minority and women associations, and contact with federal agencies small business program managers;

e. Overseeing the establishment and maintenance of contract and subcontract award records;

f. When feasible, attending or arranging for the attendance of personnel at Small Business Opportunity Workshops, Minority and Women Business Enterprise Seminars, Trade Fairs, Procurement Conferences, etc.;

g. Ensuring small business, small disadvantaged business, women-owned small business, HUBZone small business, veteran-owned small business, and service disabled veteran-owned small businesses are made aware of subcontracting opportunities as well as how to prepare responsive bids or offers;

h. Conducting and arranging of training for purchasing personnel regarding the intent and impact of Public Law 95-507 on purchasing procedures;

i. Monitoring performance, making senior management aware of actual performance against goals on a monthly basis, and making any adjustments necessary to achieve the subcontract plan goals;

j. Preparing and submitting required subcontract reports on a timely basis;

k. Coordinating activities during the conduct of compliance reviews by federal agencies;

1. Reviewing solicitation formats to remove statements, clauses, etc., which may tend to restrict or prohibit small business, small disadvantaged business, women-owned small business, HUBZone small business, veteran-owned small business, and service disabled veteran-owned small business concerns participation where possible;

m. Ensuring that the reasons for not selecting low bids submitted by small business, small disadvantaged business, women-owned small business, HUBZone small business, veteran-owned small business, and service disabled veteran-owned small businesses are documented;

n. Ensuring the establishment and maintenance of records of solicitations and subcontract award activity;

o. Ensuring that historically black colleges and universities and minority institutions shall be afforded maximum practicable opportunities, if applicable;

p. Assisting program managers as early as possible in the development cycle of major system acquisitions and system programs as pertains to the Small Business program; and

q. Advising potential suppliers as to how they can obtain information about business opportunities; and

r. Overseeing PPPL's Mentor-Protégé Program.

5. EQUITABLE OPPORTUNITY

In accordance with FAR 19.704 (a) (3), PPPL will ensure that small businesses have an equitable opportunity to compete for subcontracts. These various efforts include, but are not limited to, the following activities:

a. Outreach efforts to obtain sources;

   i. Contacting the six small business concerns through trade associations, such as: Chicago Minority Business Development Council; Black Contractors United; Mercer Regional Chamber of Commerce; New Jersey Association of Women Business Owners (NJAWBO); US Women's Chamber of Commerce; National Center for American Indian Enterprise Development; NJ/PA/DE Minority Purchasing Council; NY/NJ Minority Purchasing Council; National Minority Supplier Development Council, Inc. (NMSDC); National Veteran-Owned Business Association (NaVOBA); and Hispanic Chamber of Commerce (NY).
   ii. Contacting business development organizations such as: National Center for American Indian Enterprise Development; New Jersey Small Business Development Center; Philadelphia and Delaware Valley Business Association; National Minority Supplier Development Council (NMSDC); NJ Association of Women Business Owners; DOE OSDBU; and Mercer County Small Business Administration.
   iii. Requesting sources from SBA's Dynamic Small Business Search (DSBS) site, DOE's Small Business Energy Contract Database, the VetBiz database, FedBid, SAM database and other electronic media.
   iv. Utilization of the Internet to obtain new sources.

b. Internal efforts to guide and encourage purchasing personnel;

   i. Presenting workshops and training programs;
   ii. Establishing, maintaining and using small business source lists, guides, and other data for soliciting subcontracts, and encouraging procurement staff to utilize this data, such as: Set-Aside Alert; Guide to Women Contractors; Regional Directory of Minority- and Women-Owned Business Firms; Federal Suppliers Guide; Veterans Business Journal; Vetrepreneur; Minority Business Entrepreneur; and the Bottom Line Newsletter (NJ Assoc. of Women Business Owners).
   iii. Monitoring activities to evaluate compliance with the subcontracting plan(s); and

iv. Providing periodic updates to Laboratory senior management to track actual small business awards compared to small business subcontracting goals, and soliciting senior management support as required.

c. Outreach efforts to promote small business development will include:

i. Maintaining an annual list of outreach events and activities to attend and participate in.
ii. When feasible, attending DOE small business conferences and other small business seminars and trade shows where it is expected that attendance will identify potential sources to aid in reaching the small business goals.
iii. Networking with other Management and Operation (M&O) contractor SBLOs.
iv. Developing an internal Small Business Policy.
v. Participating in DOE Small Business Program Manager conference calls.

6. FLOW-DOWN CLAUSE

PPPL will continue to include the provisions under FAR 52.219-8 entitled, "Utilization of Small Business Concerns," in all subcontracts in excess of the small purchase limitations that offer further subcontracting opportunities. All subcontractors, except small business concerns, that receive subcontracts in excess of $700,000 ($1,500,000 for construction of any public facility) that offer further subcontracting opportunities must adopt and comply with a plan similar to the plan required by FAR 52.219-9, "Small Business Subcontracting Plan." [FAR 19.704 (a) (4)]

These plans will be reviewed against the provisions of Public Law 95-507 to assure that all minimum requirements of an acceptable subcontracting plan have been satisfied. The acceptability of percentage goals shall be determined on a case-by-case basis depending on the supplies/services involved, the availability of the six potential small business categories and prior experience. Once approved and implemented, plans will be monitored through the submission of periodic reports, and/or, as time and availability of funds permit, periodic visits to subcontractor's facilities to review applicable records and subcontracting program progress.

PPPL understands that, as prescribed in FAR 19.301-1 (d), the U.S. Government may impose a penalty against any firm misrepresenting their business size as a small business, veteran-owned small business, service disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns status for the purpose of obtaining a subcontract.

7. REPORTING AND COOPERATION

PPPL will (1) cooperate in any studies or surveys that may be required by the contracting agency or the Small Business Administration; (2) submit any periodic reports required under its Prime Contract, such as utilization reports, which show compliance with the subcontracting plan; (3) submit timely Individual Subcontracting Report (ISR), Summary Subcontracting Report (SSR) and Small Disadvantaged Business Participation Report, in accordance with the requirements of

the eSRS website (www.esrs.gov); and (4) ensure that large business subcontractors with subcontracting plans provide electronic input to the eSRS as required.

Reporting Period	Report Due	Due Date
Oct 1 – Mar 31	ISR	4/30
Apr 1 – Sept 30	ISR	10/30
Oct 1 – Sept 30	SSR	10/30
Oct 1 – Sept 30	SDB Participation Report	10/30

8. DOCUMENT RETENTION

Records will be maintained to demonstrate the procedures adopted to comply with the requirements and goals in the subcontracting plan. These records will include, but will not be limited to, the following:

a. A list of sources, guides and other data used to identify and/or locate suppliers and vendors;

b. Documents to support internal guidance and encouragement, provided to procurement staff through:

   i. Outreach efforts: workshops, seminars, training programs;
   ii. Internal guidance and encouragement: monitoring of activities to evaluate compliance;

c. The procurement files for all subcontract solicitations over $150,000 will contain details indicating, for each solicitation, whether small businesses were solicited, and if any of the solicited small business concerns received a subcontract award, as well as a justification for not soliciting small businesses or failure to award a subcontract to a solicited small business;

d. On a contract-by-contract basis, records to support subcontract award data including the name, address and business size of each subcontractor.

9. DESCRIPTION OF GOOD FAITH EFFORT

PPPL intends to use all reasonable and good faith efforts (as described in this Plan) to award the stated percentages of the final actual subcontract base amount to the six small business concerns. The following steps will be taken:

a. Issue and promulgate PPPL policy statements in support of small businesses. Develop written procedures and work instructions, and assign specific responsibilities regarding requirements of the applicable Public Law.

b. Review specific procurement actions for possible acquisition from eligible small businesses.
c. Demonstrate continuing management interest and involvement in support of this effort through such actions as regular reviews of progress.
d. Train and motivate the procurement personnel regarding the need for the support of small businesses.
e. Assist small businesses by helping with questions on solicitations, quantities, specifications, and delivery requirements.
f. Counsel and discuss subcontracting opportunities with small businesses.
g. Execute Service Agreements and Basic Ordering Agreements with small business from the six qualified small business categories, as required, in an attempt to ensure availability and usage of subcontractor personnel to support work efforts when required.
h. Establish and maintain a categorized list of potential subcontractors, including name address, telephone number, email address, product/service sold, and identification of the socio economic small business category.

This subcontracting plan was submitted by:

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Date 1/28/2016
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This subcontracting plan was approved by:

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