

**U.S. Department of Energy and  
The Trustees of Princeton University**

**ATTACHMENT J.8**

**APPENDIX H**

**FY2023 SMALL BUSINESS SUBCONTRACTING PLAN**

**Applicable to the Operation of the  
Princeton Plasma Physics Laboratory**

**Contract No. DE-AC02-09CH11466**

**Modification No. 0420**

## **Fiscal Year 2023 Small Business Subcontracting Plan**

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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: \$1,523,157,998.12

PERIOD OF CONTRACT PERFORMANCE: 04/01/2022 – 03/31/2027

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. Department of Energy (DOE) 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 is submitting the following Small Business Subcontracting Plan, which establishes the small business goals for the fiscal year FY2023.

### **1. GOALS**

The following have been established as separate dollar and percentage goals for Small Business (SB), Small Disadvantaged Business (SDB) [including Alaska Native Corporations (ANC) and Indian Tribes], Women-Owned Small Business (WOSB), HUBZone Small Business (HUBZone), Veteran-Owned Small Business (VOSB) and Service-Disabled Veteran-Owned Small Business (SDVOSB) concerns, as subcontractors, as specified in FAR 19.704. These business classifications will be collectively referred to as small business (SB) throughout the remainder of this plan.

Subcontracting goals for the small business concern categories are defined below:

- a. The total estimated dollar value of all planned subcontracting (to all types of business concerns) based upon Actionable Spend (See Attachment 1) under this Prime Contract is **\$70,000,000.00**
- b. The following percentage goals (expressed in terms of a percentage of total planned subcontracting dollars) and associated dollars are applicable to the Prime Contract cited above and will be pursued on a best effort basis consistent with good commercial practices and best value assessments:

Category	Percentage	Dollar
Small Business (SB)	50%	\$35,000,000
Other than Small Business		\$35,000,000
Total		\$70,000,000
*Small Disadvantaged Business (SDB)	5%	\$3,500,000
*Woman-Owned Small Business (WOSB)	5%	\$3,500,000
*Historically Underutilized Business Zone (HUBZone)	3%	\$2,100,000
*Veteran-Owned Small Business (VOSB)	3%	\$2,100,000
*Service-Disabled Veteran Owned Small Business (SDVOSB)	3%	\$2,100,000

\*Note: These percentages are a subset of the Small Business (SB) category.

**2. Total Dollars Planned to be Subcontracted**

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

- Award 50% to Small Business (SB) concerns, estimated at **\$35,000,000**
- Award 3% to Veteran-Owned Small Business (VOSB) concerns, estimated at **\$2,100,000**
- Award 3% to Service-Disabled Veteran-Owned (SDVOSB) concerns, estimated at **\$2,100,000**
- Award 3% to Historically Underutilized Business Zone (HUBZone) concerns, estimated at **\$2,100,000**
- Award 5% to Small Disadvantaged Businesses (SDB) concerns, estimated at **\$3,500,000**
- Award 5% to Woman-Owned Small Business (WOSB) concerns, estimated at **\$3,500,000**

**3. Products and/or Services**

The following is an estimate of the principal types of supplies and services to be subcontracted, under this contract, to small businesses as well as large businesses.

Subcontracted Supply/Service	SB	LB	SDB	WOSB	HUBZone	VOSB	SDVOSB
Building Automation		X					
Building Services	X	X				X	
Cafeteria Services	X						
Computer Hardware/Software	X	X	X	X	X	X	X
Computer Accessories	X	X	X	X	X	X	X
Computer Peripherals	X	X	X	X	X	X	X
Construction	X	X	X	X	X	X	X
Diesel & Fuel Oil		X	X	X	X		
Electrical/Electronics	X	X	X	X	X	X	X
Fabrications	X	X	X	X	X	X	X
Furniture & Fixtures	X	X	X	X	X	X	X

Subcontracted Supply/Service	SB	LB	SDB	WOSB	HUBZone	VOSB	SDVOSB
Janitorial Supplies	X		X		X	X	X
Laboratory Chemicals	X	X				X	X
Medical Supplies		X					
Office Supplies	X	X	X	X	X	X	X
Professional Staffing	X	X	X	X	X	X	X
Telecommunications	X	X				X	X
Temporary Staffing	X	X	X	X		X	X

North American Industry Classification System (NAICS) codes have not been included as the breath of work subcontracted would require an extensive listing. The Small Business Program Manager (SBPM) will work directly with the procurement staff to ensure solicitations of small businesses to the maximum extent possible.

**4. Method Used to Establish Goals**

A thorough analysis is conducted of the previous fiscal year’s actionable spend to determine the subcontracting goals for the following fiscal year. We then perform a comparison with the DOE agency wide goals to ensure that the goals outlined are consistent with DOE minimum guidelines.

**5. Method Used to Identify Potential Sources**

The methodology used to identify potential sources is comprised of several steps. In addition to Procurement personnel utilizing outside directories, such as the System for Award Management (SAM) and the SBA’s Dynamic Small Business Search (DSBS), personnel will also seek small businesses that are currently doing relevant work with Princeton University using the Princeton Prime Supplier Portal, which is part of the Jaggaer Network and other sources located within the DOE complex.

**6. Indirect Costs**

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

**7. Program Administrator(s)**

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The SBPM 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 plan. These duties include, but are not limited to, the following activities:

- Developing and promoting policy initiatives that demonstrate the support for awarding subcontracts to small, small disadvantaged, women-owned, HUBZone, veteran-owned and service-disabled veteran-owned small businesses;
- Ensuring that all small businesses are included in the services they are capable of providing;
- Ensuring periodic rotation of potential subcontractors;
- Ensuring that procurement "packages" are designed to permit the maximum possible participation of small businesses within procurement policies and procedures;
- Facilitating the utilization of various sources for the identification of small businesses;
- Participating in local small business events, including DOE and Small Business Administration (SBA) sponsored forums and workshops;
- Overseeing the establishment and maintenance of prime contract and subcontract award records;
- When feasible, attending or arranging for the attendance of Procurement personnel at Small Business Opportunity Workshops, Minority and Women Business Enterprise Seminars, Trade Fairs and Procurement Conferences;
- Ensuring small businesses are made aware of subcontracting opportunities, as well as how to prepare responsive bids or offers;
- Conducting and arranging of training for Procurement personnel on purchasing procedures;
- Monitoring performance; reporting to senior management actual small business performance against goals on a monthly basis; and making any adjustments necessary to achieve the subcontract plan goals;
- Preparing and submitting required subcontract reports on a timely basis;
- Coordinating activities during the conduct of compliance reviews by federal agencies;
- Reviewing solicitation formats to remove language, which may tend to restrict or prohibit small business participation where possible;
- Ensuring the reasons for not selecting offers submitted by small businesses are documented;
- Ensuring the establishment and maintenance of records of solicitations and subcontract award activity;

- Ensuring that Historically Black Colleges and Universities (HBCU) and Minority Institutions (MI) shall be afforded maximum practicable opportunities, if applicable;
- Assisting program managers as early as possible in the development cycle of major system acquisitions and system programs as they pertain to the Small Business program;
- Advising potential suppliers as to how they can obtain information about business opportunities; and
- Overseeing the Mentor-Protege Program and the agreement established with Aurora Technical Systems, LLC.

### **8. Equitable Opportunity Efforts**

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. Contact small businesses through trade associations, such as:
    - National Veteran-Owned Business Association (NaVOBA)
    - National Minority Supplier Development Council, Inc. (NMSDC)
    - Princeton 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/PAIDE Minority Purchasing Council
    - NJ Office of Supplier Diversity
    - NY/NJ Minority Purchasing Council
    - US Hispanic Chamber of Commerce
  - ii. Contact business organizations such as:
    - DOE Office of Small and Disadvantaged Business Utilization (OSDBU)
    - New Jersey District Office, Small Business Administration
    - National Center for American Indian Enterprise Development
    - Union County Economic Development Corporation (UCEDC)
    - NJIT Procurement Technical Assistance Center (NJIT PTAC)
    - Southeast Pennsylvania Procurement Technical Assistance Center (SE PA PTAC)
    - New Jersey Small Business Development Center
    - National Minority Supplier Development Council (NMSDC)
    - NJ Association of Women Business Owners
    - NJ Economic Development Authority
  - iii. Query sources from SBA's Dynamic Small Business Search (DSBS), DOE's Small Business Energy Contract Database, the VetBiz database, FedBid, SAM, Princeton Prime sourcing tool, the internet and other electronic media

b. Internal efforts to guide and encourage Procurement personnel:

- i. Issue, promulgate, maintain and update policy statements in support of small businesses. Develop written procedures and work instructions and assign specific responsibilities regarding requirements of the applicable Public Law;
- ii. Review specific procurement actions for possible acquisition from eligible small businesses;
- iii. Maintain established small business source lists, internet searches and other data for soliciting subcontracts, and encouraging procurement staff to utilize this data;
- iv. Monitor activities to evaluate compliance with the subcontracting plan(s);
- v. Train and motivate Procurement personnel regarding the need for and support of small businesses; and
- vi. Provide 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 in which to participate;
- 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. Assist small businesses by explaining how to do business with PPPL, answering questions regarding solicitation requirements;
- iv. Provide information and discuss subcontracting opportunities with small businesses;
- v. Participate in DOE SBPM/SBLO training conference calls and annual seminars given at DOE's Annual Expo and Forum for Small Businesses; and
- vi. Network with other Management and Operation (M&O) contractor SBPMs/SBLOs.

**9. Assurances of Clause Inclusion and Flow Down**

Procurement personnel will include the provisions under FAR 52.219-8 entitled, "Utilization of Small Business Concerns," in all procurements in excess of the Simplified Acquisition Threshold (\$250,000) that offer further subcontracting opportunities. In addition, for subcontract awards in excess of \$750,000 (\$1,500,000 for construction of any public facility) made to Large business subcontractors, Procurement personnel will flow down FAR 52.219-9, "Small Business Subcontracting Plan".

Subcontracting Plans submitted by lower-tier subcontractors will be reviewed against the requirements of FAR 52.219-9 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 Supplies/services involved and the availability of the small business categories and prior experience. Once approved and implemented, plans will be monitored through the submission of eSRS reports and/or, if time and availability of funds permit, periodic visits to subcontractor's facilities to review applicable records and subcontracting program progress.

**10. Reporting and Cooperation**

Princeton University is committed to ensuring that required reports are submitted timely and accurately. In addition, the Procurement Division 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 the prime contract, such as utilization reports, which show compliance with the subcontracting plan;
- (3) When applicable, include subcontracting data for each order when reporting subcontracting achievements for indefinite-delivery, indefinite-quantity contracts;
- (4) Submit timely Individual Subcontracting Report (ISR) and Summary Subcontracting Report (SSR) in accordance with the requirements of Electronic Subcontracting Reporting System (eSRS) ([www.esrs.gov](http://www.esrs.gov)) and reporting timeframes:

Reporting Period	Report	Due Date
October 1 – March 31	ISR	April 30
April 1 – September 30	ISR	October 30
October 1 – September 30	SSR	October 30

- (5) Ensure that large business subcontractors with subcontracting plans provide electronic input to the eSRS, as required;
- (6) Provide the prime contract number, unique entity identifier (formerly DUNS number) and the e-mail address of the Princeton University official responsible for acknowledging receipt or rejection of the ISRs, to all first-tier subcontractors with subcontracting plans so that subcontractors can submit their ISRs;
- (7) Require that each subcontractor with a subcontracting plan provide the prime contract number, its own unique entity identifier (formerly DUNS) and the e-mail address of the subcontractor's official responsible for acknowledging receipt or rejection of the ISRs, to its subcontractors with subcontracting plans;
- (8) Purchases from a corporation, company, or subdivision that is an affiliate of Princeton University or subcontractor are not included in these reports;



- (9) Subcontract award data reported by Princeton University and subcontractors shall be limited to awards made to their immediate next-tier subcontractors. Credit cannot be taken for awards made to lower tier subcontractors, unless Princeton or subcontractor has been designated to receive a small business or small disadvantaged business credit from an ANC or Indian tribe; and
- (10) Only subcontracts involving performance in the United States or its outlying areas should be included in these reports with the exception of subcontracts under a contract awarded by the State Department or any other agency that has statutory or regulatory authority to require subcontracting plans for subcontracts performed outside the United States and its outlying areas.

#### **11. Records and 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 generally include the following:

- a. A list of sources, guides and other data used to identify and/or locate suppliers and vendors;
- b. Organizations contacted in an attempt to locate sources that are small business;
- c. The procurement files for all subcontract solicitations over the Simplified Acquisition Threshold (\$250,000) will contain solicitation details indicating whether small businesses were solicited; if any of the solicited small business concerns received a subcontract award; or justification for not soliciting small businesses or failure to award a subcontract to a solicited small business;
- d. Records of any outreach efforts to contact trade associations, business development organizations, conferences and trade fairs and veterans service organizations;
- e. Documentation to support internal guidance and encouragement, provided to Procurement staff through outreach efforts to include presentations, seminars, training to include documents to support internal guidance and monitoring of activities to evaluate compliance; and
- f. On a subcontract-by-subcontract basis, records to support subcontract award data, including the name, address and business size and subcategorization of each subcontractor.

#### **12. Good Faith Efforts During Princeton Bid/Proposal Preparation**

If applicable, Princeton University 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 concerns that were 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.

#### **13. Written Explanation to Contracting Officer**

When applicable, Princeton University will provide the Contracting Officer with a written explanation if the Princeton University fails to acquire articles, equipment, supplies, services or materials or obtain the

performance of construction work as described in Item 12 above. The written explanation will be submitted to the Contracting Officer within thirty (30) days of Prime Contract completion.

**14. Subcontractor Discussions with the Contracting Officer**

Princeton University will not prohibit a subcontractor from discussing with the Contracting Officer any material matter pertaining to payment to or utilization of a subcontractor.

**15. Timely Payments to Small Business**

Princeton University will ensure timely payment of amounts due pursuant to the terms of its subcontracts with small businesses. PPPL will continue to foster financial stimulation to small businesses by incorporating Net 15 payment terms in all awards to small businesses. If reduced or untimely payments are made to a small business subcontractor, the Contracting Officer will be notified in accordance with FAR 52.242-5.

**16. Description of Good Faith Efforts**

Princeton University intends to use all reasonable and good faith efforts (as described in this Plan) to meet or exceed the stated small business subcontracting goals. To achieve the stated goals, Princeton will employ the following subcontracting strategies:

- a. Similar to requirements notated in Chapter 19.2 of the DOE Acquisition Guide, Princeton's Procurement Specialists may make purchases valued up to \$50,000 on a non-competitive basis to small businesses through awards made at fair market prices. Documentation of adequate market research is required;
- b. Preference will be given to small businesses for purchases with an estimated value greater than \$3,500 up to the Simplified Acquisition Threshold (\$250,000), where there is a reasonable expectation that offers are competitive as to price, quality, and delivery;
- c. For awards in excess of the Simplified Acquisition Threshold (\$250,000), every effort will be made to utilize small business concerns;
- d. Execute Service Agreements and Basic Ordering Agreements with small businesses in an attempt to ensure availability and usage of subcontractor personnel to support work efforts when required;
- e. 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;
- f. Seek to establish and foster long-term business relationships with a small business under the DOE Mentor-Protege 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 Protege, subject to the best commercial practices and procedures required by DEAR 970.4402-2(d);

- g. Award non-competitive subcontracts to a protégé of another DOE Mentor. Awards will be within the same dollar thresholds as identified for the 8(a) Program;
- h. In the award of subcontracts, utilize SB, HUBZone, SDVOSB, EDWOSB, WOSB and 8(a) set asides and single/sole source methodologies similar to those outlined in FAR Part 19.


**17. Effective Implementation of the Subcontracting Plan**

In order to effectively implement this plan to the extent consistent with efficient contract performance, Princeton University shall perform the following functions:

- a. Assist small businesses by arranging solicitations, time for the preparation of bids, quantities, specifications, and delivery schedules so as to facilitate the participation by such concerns. Where the lists of potential small businesses subcontractors are excessively long, reasonable effort shall be made to give all such small business concerns an opportunity to compete over a period of time;
- b. Provide adequate and timely consideration of the potentialities of small businesses in all “make-or-buy” decisions;
- c. Counsel and discuss subcontracting opportunities with representatives of small business firms;
- d. Confirm that a subcontractor representing itself as a HUBZone small business concern is certified by SBA as a HUBZone small business concern in accordance with 52.219-8(d)(2);
- e. Provide notice to subcontractors concerning penalties and remedies for misrepresentations of business status as small, veteran-owned small business, HUBZone small, small disadvantaged, or women-owned small business for the purpose of obtaining a subcontract;
- f. For all competitive subcontracts over the Simplified Acquisition Threshold (\$250,000), on the date of subcontract award, in which a small business concern received a small business preference, upon determination of the successful subcontract offeror, prior to award of the subcontract the Procurement Specialist will inform each unsuccessful small business subcontract offeror in writing of the name and location of the apparent successful offeror and if the successful subcontract offeror is a small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, or women-owned small business concern;
- g. Assign each subcontract the NAICS code and corresponding size standard that best describes the principal purpose of the subcontract; and
- h. Subcontracting plans are not required from subcontractors when the subcontractor provides a commercial item subject to the clause at 52.244-6, Subcontracts for Commercial Items.

Princeton University is firmly committed to subcontracting with a diverse range of small businesses. Our commitment is driven by the belief that engaging a diverse supply base is mutually beneficial as it fosters competition, provides opportunities and broadens the capabilities of small business entities.


Submitted:

By:  Digitally signed by  
Hekima W. Qualls  
Date: 2022.10.24  
11:59:23 -04'00'

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Name: Hekima W. Qualls  
Title: PPPL Chief Procurement Officer  
The Trustees of Princeton University  
(609) 243-2443

Approved:

By:  Digitally signed by  
DANIEL FABIAN  
Date: 2022.10.24  
13:33:51 -04'00'

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Daniel Fabian  
Contracting Officer  
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## **Attachment 1**

### **Actionable Spend**

Procurement Spend (actionable) is defined as the total expected spend for all procurements less the anticipated cost for those actions that cannot be influenced by a procurement process(excluded spend). Below are examples of excluded spend. These are typically transactions that relate more to the movement of money than spending on goods or services.

- Internally generated costs such as salaries and wages
- Employee benefits and insurance
- Payments for petty cash
- Depreciation and interest
- Income taxes and property taxes
- Lease payments
- Bank fees, fines, claims, and dues
- Utilities such as electricity, water, sewer, and other services purchased from a municipality or solely authorized by the municipality to provide those services in a particular geographical region
- Philanthropic contributions
- Insurance
- Inter-company orders
- Financial Assistance
- Interagency Agreements/Inter-entity Work Orders (work performed by one DOE office or site/facility management contractor for another)
- Mandatory Sources (FAR Part 8)
- Subcontracts to specifically named partners within a University Joint Proposal or collaborative agreement
- Unallowable expenses

Below are examples of actionable spend. Actionable spend is an act of acquiring or buying goods, services or works from an external source. For Contractor Sites, Procurement Spend (Actionable) would be an internal procurement system run of all subcontract actions with decrements for any non-procurement fund transfers and those actions listed above.

- For Contractor Sites, Procurement Spend (Actionable) would be an internal procurement system run of all subcontract actions with decrements for any non-procurement fund transfers.
- All Government credit card transactions
- Spend under all Federal Strategic Sourcing Initiative (FSSI) Blanket Purchase Agreements (BPA) (DDS2, OS2, Print Management and Wireless, etc.)
- Spend under all GSA/NASA schedule (FSS, GWAC, MAS, SWEP, etc.) delivery and task orders (IDIQs, BPAs)