

SMALL BUSINESS SUBCONTRACTING PLAN

AND

SMALL DISADVANTAGED BUSINESS PARTICIPATION PROGRAM TARGETS (IF APPLICABLE)

D. SMALL BUSINESS SUBCONTRACTING PLAN

Parsons is committed to small business (SB) subcontracting and is committed to providing meaningful roles to SB concerns on its contracts. As evidence of this commitment, Parsons has included Parallax, a small disadvantaged business (SDB) and woman-owned small business (WOSB) as a teaming subcontractor. Additional subcontracting opportunities will be provided to local small business as the SWPF work develops.

This Subcontracting Plan has been prepared to establish our commitments and to satisfy the applicable requirements of Public Law 95-507 as implemented by FAR 19.704. The plan follows the guidelines provided in FAR 52.219-9 and RFP Section L, Attachment D.

D.1 SUBCONTRACTING GOALS (%)

Parsons plans on providing significant subcontracting opportunities. Our subcontracting goals for Phase I and Phase II, expressed as a percentage of planned subcontracting dollars, are presented below.

		Goals (%)	
		Phase I	Phase II
(i)	Total percentage of work to be sub-contracted	40	50
(ii)	Large Business Concerns	80	50
(iii)	Small Business Concerns	20	50
(iv)	Veteran-Owned Small Business Concerns	4	4
(v)	Service-Disabled Veteran Owned Small Business [inc. in (iv)]	3	3
(vi)	HUBZone Small Business Concerns	3	3
(vii)	Small Disadvantaged Business Concerns	10	10
(viii)	Woman-Owned Small Business Concerns	10	10
(ix)	HBCU/MI	1	10

Historically Black Colleges or Universities and Minority Institutions (HBCU/MI) are in the Small Business goals since there are opportunities for research and development under this subcontracting plan.

D.2 SUBCONTRACTING GOALS (\$)

Our subcontracting goals with respect to SB, HUBZone, Veteran-Owned SB, Service-Disabled Veteran Owned SB, WOSB, and HBCU/MI are presented in dollars for Phase I. If Parsons is awarded Phase II, we would revise this plan, with DOE's approval, to include dollar values for Phase II consistent with the percentages presented in D.1.

		Value (\$1,000)
(i)	Total dollars to be subcontracted for an individual plan	\$4,162
(ii)	Small Business Concerns	\$832
(iii)	Veteran-Owned Small Business Concerns	\$166
(iv)	Service-Disabled Veteran Owned Small Business [inc. in (iii)]	\$125
(v)	HUBZone Small Business Concerns	\$125
(vi)	Small Disadvantaged Business Concerns	\$416
(vii)	Woman-Owned Small Business Concerns	\$416

D.3 PRINCIPAL TYPES OF SUPPLIES AND SERVICES TO BE SUBCONTRACTED

Parsons plans on providing significant subcontracting opportunities for small business concerns. These services would be predominantly in support of construction during Phase II. During Phase I, we anticipate using additional subcontracts outside of our Team for surveying, geotechnical services, and technology support. In the table below, we have identified the types of supplies and services to be subcontracted during both phases of the contract. For the most part, it is our plan to maximize firm fixed price (FFP) subcontracting outside of our teaming subcontractors. These subcontractors would be selected through a competitive procurement process using our federal government certified procurement systems. The awardees of these subcontracts are to be determined (TBD) and are noted below. Likewise, contract values are TBD.

With respect to teaming subcontractors, the RFP requires that they be fee-sharing partners. Therefore, they will have cost plus fixed fee contracts in Phase I and a cost plus incentive fee (CPIF) contract in Phase II, if that remains as the Phase II contract type. The estimated value of these subcontracts is also to be determined based on specific work under the contract.

Products/Services	Subcontractor Name	Subcontract Type	Estimated Value
a. Large Business			
Technology Management	General Atomics	CPFF/CPIF	TBD
Commissioning Services	Duratek	CPFF/CPIF	TBD
Process Engineering	Kvaerner	CPFF/CPIF	TBD
b. Small Business			
ESH&Q Support	Parallax	CPFF/CPIF	TBD
Construction	TBD	FFP	TBD
Geotechnical	TBD	FFP	TBD
c. Veteran-Owned Small Business			
Construction	TBD	FFP	TBD
Surveying	TBD	FFP	TBD
Business Management	TBD	FFP	TBD
d. Service-Disabled Veteran-Owned Small Business			
Construction	TBD	FFP	TBD
e. HUBZone Small Business			
Construction	TBD	FFP	TBD
Surveying	TBD	FFP	TBD
f. Small Disadvantaged Business			
ESH&Q Support	Parallax	CPFF/CPIF	TBD
Construction	TBD	FFP	TBD
g. Woman-Owned Small Business			
ESH&Q Support	Parallax	CPFF/CPIF	TBD
Construction	TBD	FFP	TBD
h. HBCU/MI			
R&D Services	TBD	CPFF	TBD

D.4 METHOD USED TO DEVELOP SUBCONTRACTING GOALS

A preliminary work breakdown structure was developed for both Phase I and Phase II. Parsons then performed a "make or buy" analysis of the work to be subcontracted within the team, then external to the team. Since Parsons approach to construction is construction management, we were able to identify significant opportunities to be subcontracted.

Our proposed goals were developed taking into account the work to be subcontracted and our knowledge of the local contractor community. This knowledge has been gained through our 20 years supporting the Savannah River Site.

D.5 METHODS USED TO IDENTIFY POTENTIAL SOURCES

Parsons has been providing engineering and construction management support services to Savannah River Site. Likewise, our teaming partner Duratek has been operating the Barnwell facility for over 30 years. Together, we have developed a considerable database of qualified, local, small business concerns. In addition to our existing sources lists, we plan on using the following sources for solicitation purposes to identify potential suppliers:

- ▶ National Directory of Minority-Owned Business Firms
- ▶ National Directory of Woman-Owned Business Firms
- ▶ Regional Directories of Minority-Owned and Woman-Owned Business Firms

- ▶ The SBA Small Business Subcontracting Directory
- ▶ SBA PRO-Net Data Base

D.6 USE OF INDIRECT COSTS IN ESTABLISHING SUBCONTRACTING GOALS

Indirect and overhead cost goals are not a part of this Subcontracting Plan.

D.7 PLAN ADMINISTRATOR

The Corporate Small Business Liaison Officer, Larry Owens, telephone number (626) 440-6182, will administer the subcontracting plan and is responsible for issuing appropriate instructions to personnel to assure compliance with FAR 52.219-9 and Company policies on utilization of Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns. A description of his duties is as follows:

- ▶ Administering the Company Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone Business Concerns Program in accordance with FAR, DEAR, P.L. and Company policies and procedures.
- ▶ Prepare and submit required summary subcontract report, Standard Form 295, to the Deputy Secretary of Energy.
- ▶ Conduct training for all personnel involved in the procurement function for development of new Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns.
- ▶ Review procurements over \$10,000 for compliance to FAR, DEAR, P.L. and Company policies and procedures on subcontracting to Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns.
- ▶ Attend local congressional, civic, conferences and trade associations for Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns, and act as a counselor to discuss subcontracting opportunities.

D.8 DESCRIPTION OF EFFORTS

Parsons will make every possible effort, within contractual and monetary constraints, to assure that Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns have equitable opportunity to compete for subcontracts. The company-wide policy and procedures outline in detail the responsibilities of management and procurement personnel.

- ▶ Parsons management will have periodic reviews of its performance towards meeting its goals. The Parsons Director of Contracts and Procurement will be assigned this responsibility to ensure its visibility.
- ▶ This activity will include periodic procurement reviews and reports to management. Division and region managers will be assigned the responsibility of reassessing performance within their operations and improving the performance.
- ▶ Appropriate Parsons personnel will be trained in the application of company policies. This includes formal and informal training, which will be the responsibility of the Small Business Liaison Officer.
- ▶ Parsons will provide technical and administrative assistance to Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone businesses prior to the solicitation phase, during the solicitation phase and during contract performance.
- ▶ Such technical assistance and administrative assistance is to include, but not be limited to:
 - A. Buyer interface to discuss specification and production requirements.
 - B. Cognizant engineer and/or component engineers to interface for specification clarification and requirements.
 - C. Vendor visits, as required, to discuss facility capabilities and recommend process improvements.
- ▶ Parsons will assure that a best effort will be made to use, whenever applicable or feasible, Historic Black Colleges or Universities (HBCUs) and Minority Institutions (MIs). This will be accomplished by considering whether subcontracts, which are contemplated, will involve research or studies of the type normally performed by higher educational institutions. These dollars will be included in the Small Disadvantaged Business Goals. (See goals portion of the plan.)
- ▶ Parsons will provide counseling assistance to the fullest extent possible to any Small Disadvantaged business concerns upon request, and consistent with good business practice. Such assistance will include, but not be limited to (i) progress payments, (ii) on-site technical assistance, (iii) quality assurance assistance, (iv) engineering assistance, and any other areas that may be deemed necessary.
- ▶ Where possible, and consistent with good business practice, Parsons will restrict competition of certain consumables such as computer peripherals (paper, tapes,

diskettes, etc.) stationery supplies, and other miscellaneous computer components to Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns.

- ▶ The Project Manager will be responsible for ensuring timely consideration of Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns in all make-or-buy decisions under the contract for which the manager is responsible, based upon the potential and capability of these concerns. This effort is detailed in Company policy.
- ▶ The Small Business Liaison Officer will participate in the entire procurement cycle and will cause the review of subcontracts over \$10,000.
- ▶ Parsons will be an active participant in symposiums and conferences, as well as meetings sponsored by federal agencies, local government agencies, and private groups. The Small Business Liaison Officer and/or Administrator will attend and contribute to the success of these conferences and act as a counselor on a continuous basis. In addition, Parsons will provide technical and administrative advice and encouragement to Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone companies with the objective of qualifying them for potential subcontracting. Parsons has and will use all systems and publications previously listed in identifying Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns for proposal activity.

D.9 CLAUSE FLOWDOWN

Parsons will include a subcontracting clause entitled "Utilization of Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone Business Concerns" in accordance with FAR 52.219.8 and P.L. 105-135 in all subcontracts which offer further subcontracting opportunities, and will require all subcontractors (except Small Business Concerns) who receive subcontracts in excess of \$500,000 (\$1,000,000 if construction) to adopt a plan as outlined above in accordance with FAR 52.219.9.

The Small Business Liaison Officer will review all potential subcontracts in excess of \$500,000 (\$1,000,000 if construction) to assure that a subcontracting plan is prepared in consonance with its own plan under the prime contract. He is also responsible for monitoring compliance to this subcontracting plan.

D.10 REPORTS AND COOPERATION IN STUDIES AND SURVEYS

Parsons will cooperate in any studies or surveys and submit such periodic reports as may be required by the Federal Agency or the Small Business Administration in order to determine the extent of compliance with the subcontracting plan. Parsons agrees to submit Standard Form (SF) 294, Subcontracting Report for Individual Contracts, and Standard Form (SF) 295, Summary Subcontract Report, in accordance with the instructions on the forms. In addition, Parsons will assure that its subcontractors agree to submit Standard Forms 294 and 295 when required.

D.11 RECORDS

Records will be maintained and updated quarterly, or as required, to demonstrate the compliance to this plan and to show the total dollar subcontract commitments and the percentage committed to Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns. The Subcontracting Report for Individual Contracts, Standard Form 294, as well as Standard Form 295, will be utilized for this purpose when required. A list of the records we will maintain is presented below:

- (i) Source lists of Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns will be on file and be maintained and updated to identify new sources. The current source lists are available at all times to all purchasing personnel.
- (ii) Organizations to be contacted as needed to obtain Small, Small Disadvantaged, Veteran-Owned, Woman-Owned and HUBZone business concerns are:
 - (a) DCMAO
 - (b) Small Business Administration
 - (c) Black Businessmen's Association
 - (d) Asian Businessmen's Association
 - (e) Latin Manufacturer's Association
 - (f) Regional Purchasing Associations
 - (g) National Association for Equal Opportunity in Higher Education
 - (h) NMSDC (National Minority Supplier Development Council)
 - (i) USHCC (U.S. Hispanic Chamber of Commerce)
- (iii) On a contract-by-contract basis, records will be maintained on all subcontract solicitations over \$100,000 indicating (a) whether Small Business was solicited, and if not, why not; (b) whether veteran-owned small business concerns were solicited.

ited and, of not, why not; (c) whether service-disabled veteran-owned small business concerns were solicited and, if not, why not; (d) whether HUBZone Small Business was solicited, and if not, why not; (e) Small Disadvantaged Business was solicited, and if not, why not; (f) whether Woman-Owned Small Business was solicited, and if not, why not; and (g) reasons for the failure of responding Small Businesses to receive the subcontract award.

- (iv) Records will be maintained on outreach efforts as follows:
 - (a) Contacts with Disadvantaged and Small Business trade associations.

- (b) Contacts with business development organizations.
- (c) Attendance at Small and Disadvantaged business procurement conferences and trade fairs.
- (d) Veterans service organizations
- (v) Records will be maintained on internal guidance and encouragement provided to buyers as follows:
 - (a) Workshops, seminars, training, etc.
 - (b) Monitoring performance to evaluate compliance with the program's requirements.
- (vi) Records will be maintained on a contract-by-contract basis to support award claim data submitted by the offeror to the Government, including the name, address, and business size of each subcontractor.

SUBMITTED BY:

SIGNED:



DATE: 2-28-02

TYPED NAME: Mr. Lawrence A. Owens

TITLE: Procurement Manager

PLAN ACCEPTED BY:

SIGNED:



DATE: 9/17/02

TYPED NAME:

Charlene Smith
Contracting Officer

TITLE:

A. PARSONS, INCLUDING OUR SDB TEAMING PARTNER, PARALLAX, AND OUR LARGE BUSINESS TEAMING PARTNERS: DURATEK, GA, AND KVAERNER.

NAICS Code	Description of NAICS Major Group	SDB Dollars	Percentage
54	Professional, scientific, and technical services (Parallax)	\$316,000	3%
54	Professional, scientific, and technical services (All others)	-	92%
	Subtotal	\$316,000	95%

B. SUBCONTRACTORS (TO BE DETERMINED)

NAICS Code	Description of NAICS Major Group	SDB Dollars	Percentage (%)
54	Professional, scientific, and technical services	\$100,000	1%
54	Professional, scientific, and technical services	-	4%
	Subtotal	\$100,000	5%

C. TOTAL (A + B)

NAICS Code	Description of NAICS Major Group	SDB Dollars	Percentage (%)
54	Professional, scientific, and technical services	\$416,000	5%
54	Professional, scientific, and technical services	-	95%
	Subtotal	\$416,000	100%

The percentages stated are shown as a percentage of contract price. These are consistent with our SB Plan goals where we commit to subcontract 40% of the Phase I work and provide 10% of this work to SDB concerns for a total of 4% of the contracted value (40% x 10%)

The proposed sharing percentages applicable to FAR 52.219.10 Incentive Subcontracting Program (OCT 2000) and FAR 52.219.26 Small Disadvantaged Business Participation Program – Incentive Subcontracting (OCT 2000) is 10% of the dollars achieved in excess of the goals.

5.0 SMALL AND SMALL DISADVANTAGED BUSINESS PLAN

5.1 Small Business Subcontracting Past Performance

Parsons recognizes the importance of providing meaningful subcontracting opportunities to small businesses (SB) of all types. We take our role and responsibility seriously in this endeavor. Therefore, within the Parsons organization we have established a program to promote and monitor this overall effort. Parsons has long had in place a Small Business Program as indicated in a recent revision to the Parsons Small Business Policy Statement shown in Exhibit E-1 of the Phase I proposal. Additionally, Parsons Small Business Program has received outstanding ratings in compliance reviews performed by various governmental agencies as demonstrated by the letter shown in Exhibit E-2 of the Phase I proposal.

5.2 Small Business Subcontracting Plan

Parsons is committed to SB subcontracting and is committed to providing meaningful roles to SB concerns on its contracts.

This Subcontracting Plan has been prepared to establish our commitments and to satisfy the applicable requirements of Public Law 95-507 as implemented by FAR 19.704. The plan follows the guidelines provided in FAR 52.219-9 and Request for Proposal (RFP) Section L, Attachment D.

5.2.1 Subcontracting Goals (%)

Parsons plans on providing significant subcontracting opportunities. Our subcontracting goals for Phase II, expressed as a percentage of planned total subcontracting dollars are presented in Table 5-1.

Table 5-1. Subcontracting Goals in Percentages

	Goals (%)*
	Phase II
a. Total percentage of work to be subcontracted	50
b. Large Business Concerns	70
c. Small Business Concerns	30
d. Veteran-Owned Small Business Concerns	3
e. Service-Disabled Veteran Owned Small Business (referenced in Section 5.12 Records)	3
f. HUBZone Small Business Concerns	3
g. Small Disadvantaged Business (SDB) Concerns	7
h. Woman-Owned Small Business (WOSB) Concerns	7
i. Historically Black Colleges or Universities (HBCU)/Minority Institutions (MI)	.5

* All percentages listed in this Figure are based on percentage of total work to be subcontracted

Historically Black Colleges or Universities and Minority Institutions are included in the SB goals because there are opportunities for Technology Development under this subcontracting plan.

Our subcontracting goals with respect to SDB, HUBZone, Veteran-Owned SB, Service-Disabled Veteran Owned SB, WOSB, and HBCU/MI are presented in dollars in Table 5-2 for Phase II.

Table 5-2. Subcontracting Goals in Dollars

Phase II: Estimated Value \$328,394,112 including fee	Value
Total dollars to be subcontracted	\$164,222,617
Large Business Concerns	\$114,955,832
Small Business Concerns	\$49,266,785
Veteran-Owned Small Business Concerns	\$4,926,679
Service-Disabled Veteran Owned Small Business (referenced in Section 5.12 Records)	\$4,926,679
HUBZone Small Business Concerns	\$4,926,679
Small Disadvantaged Business Concerns	\$11,495,583
Woman-Owned Small Business Concerns	\$11,495,583
Historically Black Colleges or Universities/Minority Institutions	\$821,113

5.3 Small Disadvantaged Business Participation Program Targets

Parsons plans on providing significant opportunities to small disadvantaged business (SDB) in Phase II of the contract. The value of these opportunities will be significant during Phase II because of the volume of construction work to be subcontracted. Additionally, there are professional services opportunities as shown by our commitment to Parallax as a teaming subcontractor. Parallax will be providing Environmental, Safety, Health, and Quality (ESH&Q) support to Parsons during Phase II.

Listed below are our planned SDB participation targets for Phase II. This SDB subcontracting Plan provides our Phase II targets on a percentage and dollar basis as shown in Table 5-3, Table 5-4, and Table 5-5.

Table 5-3. SDB Teaming Partner Goals for Professional Services

NAICS Code	Description of NAICS Major Group	SDB Dollars	Percentage of Total Subcontracted Dollars
54	Professional, scientific, and technical services (Parallax)	\$5,500,000	3.35%
	Subtotal	\$5,500,000	

Table 5-4. SDB Goals for Construction

NAICS Code	Description of NAICS Major Group	SDB Dollars	Percentage of Total Subcontracted Dollars
23	Construction	\$5,995,583	3.65%
	Subtotal	\$5,995,583	

Table 5-5. Combined SDB Goals

NAICS Code	Description of NAICS Major Group	SDB Dollars	Percentage of Total Subcontracted Dollars
54	Professional, scientific, and technical services	\$5,500,000	3.35%
23	Construction	\$5,995,583	3.65%
	Subtotal	\$11,495,583	7%

The percentages for SDB awards are shown as a percentage of dollars to be subcontracted. These are consistent with our Subcontracting Plan goals where we commit to subcontract 50% of the Phase II work. This SDB Plan provides 7% of total subcontracted work to SDB's for a total of 3.5% of the Contract value.

5.4 Principal Types of Supplies and Services to be Subcontracted

Parsons plans upon providing significant subcontracting opportunities for small business concerns, these services would be predominantly in support of construction during Phase II. In the table below, we have identified the types of supplies and services to be subcontracted during both phases of the contract. For the most part, it is our plan to maximize firm fixed price (FFP) subcontracting outside of our teaming subcontractors. These subcontractors would be selected through a competitive procurement process using our Contractor Procurement System Review (CPSR) approved procurement system. The awardees of these subcontracts are therefore to be determined (TBD) and are noted below. Likewise, subcontract values are TBD.

With respect to teaming subcontractors, the RFP requires that they be fee-sharing partners. Therefore, they will have given cost plus fixed fee contracts in Phase I and a cost plus incentive fee (CPIF) contract in Phase II, if that remains as the Phase II contract type. The estimated value of these subcontracts is also TBD based on specific work under the contract. Types of services and subcontracts are listed in Table 5-6.

Table 5-6. Subcontracting Services

Products/Services	Subcontractor Name	Subcontract Type	Estimate Value
a. Large Business			
Technology Management	General Atomics	CPFF/CPIF	TBD
Commissioning Services	Duratek	CPFF/CPIF	TBD
Process Engineering	Kvaerner	CPFF/CPIF	TBD
b. Small Business			
ESH&Q Support	Parallax	CPFF/CPIF	TBD
Construction	TBD	FFP	TBD
Geotechnical	TBD	FFP	TBD
c. Veteran-Owned Small Business			
Geotechnical Services	TBD	FFP	TBD
Surveying	TBD	FFP	TBD
Business Management	TBD	FFP	TBD
d. Service-Disabled Veteran-Owned Small Business			
Construction	TBD	FFP	TBD
e. HUBZone Small Business			
Construction	TBD	FFP	TBD
Surveying	TBD	FFP	TBD
f. Small Disadvantaged Business			
ESH&Q Support	Parallax	CPFF/CPIF	TBD
Construction	TBD	FFP	TBD
g. Woman-Owned Small Business			
ESH&Q Support	Parallax	CPFF/CPIF	TBD
Construction	TBD	FFP	TBD
h. HBCU/MI			
Technology Development	TBD	CPFF	TBD

5.5 Method Used to Develop Subcontracting Goals

A preliminary work breakdown structure was developed for Phase II. This breakdown provided a "make or buy" analysis of the work to be subcontracted within the team, then external to the team. Since

Parsons has extensive experience in construction management, we were able to identify significant opportunities to be subcontracted.

Our proposed goals were therefore developed taking into account the work to be subcontracted and our knowledge of the local contractor community. This knowledge has been gained through 20 years of support to the Savannah River Site.

5.6 Methods Used to Identify Potential Sources

Parsons has been providing engineering and construction management support services to Savannah River Site. Likewise, our teaming partner Duratek has been operating the Barnwell facility for over 30 years. Together, we have developed a database of qualified, local, small business concerns. In addition to our existing sources lists, we plan on using the following sources for solicitation purposes to identify potential suppliers:

- ▶ National Directory of Minority-Owned Business Firms
- ▶ National Directory of Women-Owned Business Firms
- ▶ Regional Directories of Minority-Owned and Women-Owned Business Firms
- ▶ Directories of Veteran and Disabled Veteran Organizations
- ▶ SBA PRO-Net Data Base

5.7 Use of Indirect Costs in Establishing Subcontracting Goals

Indirect and overhead cost goals are not a part of this Subcontracting Plan.

5.8 Plan Administrator

The Corporate Small Business Liaison Officer, Gary Breslau, telephone number (626) 440-2440, will administer the subcontracting plan and is responsible for issuing appropriate instructions to personnel to assure compliance with FAR 52.219-9 and Company policies on utilization of Small, Small Disadvantaged, Veteran-Owned, Service Disabled Veteran Owned, Women-Owned and HUBZone business concerns. A description of his duties is as follows:

- ▶ Administering the Company Small, Small Disadvantaged, Veteran-Owned, Woman-owned and HUBZone Business Concerns Program in accordance with FAR, DEAR, P.L. and Company policies and procedures.
- ▶ Prepare and submit required summary subcontract report, Standard Form 295, to the Deputy Secretary of Energy.
- ▶ Conduct training for all personnel involved in the procurement function for development of new Small, Small Disadvantaged, Service Disabled and Veteran-Owned, Woman-owned and HUBZone business concerns.
- ▶ Review procurements over \$100,000 for compliance to FAR, DEAR, P.L. and Company policies and procedures on subcontracting to Small, Small Disadvantaged, Service Disabled and Veteran-Owned, Woman-owned and HUBZone business concerns.

- ▶ Attend local congressional, civic, conferences and trade associations for Small, Small Disadvantaged, Service Disabled and Veteran-Owned, Woman-owned and HUBZone business concerns, and act as a counselor to discuss subcontracting opportunities.

5.9 Description of Efforts

Parsons will make every possible effort, within contractual and monetary constraints, to assure that Small, Small Disadvantaged, Veteran-Owned, Small Disabled Veteran Owned, Woman-owned and HUBZone business concerns have equitable opportunity to compete for subcontracts. The company-wide policy and procedures outline in detail the responsibilities of management and procurement personnel.

- ▶ Parsons management will have periodic reviews of its performance towards meeting its goals. The Parsons Director of Contracts and Procurement will be assigned this responsibility to ensure its visibility.
- ▶ This activity will include periodic procurement reviews and reports to management. Division and region managers will be assigned the responsibility of reassessing performance within their operations and improving the performance.
- ▶ Appropriate Parsons' personnel will be trained in the application of company policies. This includes formal and informal training, which will be the responsibility of the Small Business Liaison Officer.
- ▶ Parsons will provide technical and administrative assistance to Small, Small Disadvantaged, Veteran-Owned; Small Disabled Veteran Owned, Woman-owned and HUBZone businesses prior to the solicitation phase, during the solicitation phase and during contract performance.
- ▶ Such technical assistance and administrative assistance is to include, but not be limited to:
 - A. Buyer interface to discuss specification and production requirements.
 - B. Cognizant engineer and/or component engineers to interface for specification clarification and requirements.
 - C. Vendor visits, as required, to discuss facility capabilities and recommend process improvements.
- ▶ Parsons will assure that a best effort will be made to use, whenever applicable or feasible, Historic Black Colleges or Universities (HBCUs) and Minority Institutions (MIs). This will be accomplished by considering whether subcontracts, which are contemplated, will involve research or studies of the type normally performed by higher educational institutions. These dollars will be included in the Small Disadvantaged Business Goals when reported on the SF294.
- ▶ Parsons will provide counseling assistance to the fullest extent possible to any Small Disadvantaged business concerns upon request, and consistent with good business practice. Such assistance will include, but not be limited to (i) progress payments, (ii) on-site technical assistance, (iii) quality assurance assistance, (iv) engineering assistance, and any other areas that may be deemed necessary.
- ▶ Where possible, and consistent with good business practice, Parsons will restrict competition of certain consumables such as computer peripherals (paper, tapes, diskettes, etc.) stationery supplies, and other miscellaneous computer components to Small Disadvantaged, Veteran-Owned, Service Disabled Veteran Owned, Woman-owned, and HUBZone business concerns.

- ▶ The Project Manager will be responsible for ensuring timely consideration of Small, Small Disadvantaged, Veteran-Owned, Service Disabled Veteran Owned, Woman-owned, and HUBZone business concerns in all make-or-buy decisions under the contract for which the manager is responsible, based upon the potential and capability of these concerns. This effort is detailed in Company policy.
- ▶ The Small Business Liaison Officer will participate in the entire procurement cycle and will cause the review of subcontracts over \$100,000.
- ▶ Parsons will be an active participant in symposiums and conferences, as well as meetings sponsored by federal agencies, local government agencies, and private groups. The Small Business Liaison Officer and/or Administrator will attend and contribute to the success of these conferences and act as a counselor on a continuous basis. In addition, Parsons will provide technical and administrative advice and encouragement to Small, Small Disadvantaged, Veteran-Owned, Service Disabled Veteran Owned, Woman-owned, and HUBZone companies with the objective of qualifying them for potential subcontracting. Parsons has and will use all systems and publications previously listed in identifying Small, Small Disadvantaged, Veteran-Owned, Woman-owned, and HUBZone business concerns for proposal activity.

5.10 Clause Flowdown

Parsons will include a subcontracting clause entitled "Utilization of Small, Small Disadvantaged, Veteran-Owned, Woman-owned, and HUBZone Business Concerns" in accordance with FAR 52.219.8 and P.L. 105-135 in all subcontracts which offer further subcontracting opportunities, and will require all subcontractors (except Small Business Concerns) who receive subcontracts in excess of \$500,000 (\$1,000,000 if construction) to adopt a plan as outlined above in accordance with FAR 52.219.9.

The Small Business Liaison Officer will review all potential subcontracts in excess of \$500,000 (\$1,000,000 if construction) to assure that a subcontracting plan is prepared in consonance with its own plan under the prime contract. He is also responsible for monitoring compliance to this subcontracting plan.

5.11 Reports and Cooperation in Studies and Surveys

Parsons will cooperate in any studies or surveys and submit such periodic reports as may be required by the Federal Agency or the Small Business Administration in order to determine the extent of compliance with the subcontracting plan. Parsons agrees to submit Standard Form (SF) 294, Subcontracting Report for Individual Contracts, and Standard Form (SF) 295, Summary Subcontract Report, in accordance with the instructions on the forms. In addition, Parsons will assure that its subcontractors agree to submit Standard Forms 294 and 295 when required.

5.12 Records

Records will be maintained and updated quarterly, or as required, to demonstrate the compliance to this plan and to show the total dollar subcontract commitments and the percentage committed to Small, Small Disadvantaged, Veteran-Owned, Service Disabled Veteran Owned, Woman-owned, and HUBZone business concerns. The Subcontracting Report for Individual Contracts, Standard Form 294, as well as Standard Form 295, will be utilized for this purpose when required. A listing of the records we will maintain are presented below.

- (i) Source lists of Small, Small Disadvantaged, Veteran-Owned, Woman-owned, Service Disabled, Veteran Owned, and HUBZone business concerns will be on file and be maintained and updated to identify new sources. The current source lists are available at all times to all purchasing personnel.
- (ii) Organizations to be contacted as needed to obtain Small, Small Disadvantaged, Veteran-Owned, Service Disabled Veteran Owned, Woman-owned, and HUBZone business concerns are:
 - (a) DCMAO
 - (b) Small Business Administration
 - (c) Black Businessmen's Association
 - (d) Asian Businessmen's Association
 - (e) Latin Manufacturer's Association
 - (f) Regional Purchasing Associations
 - (g) National Association for Equal Opportunity in Higher Education
 - (h) NMSDC (National Minority Supplier Development Council)
 - (i) USHCC (U.S. Hispanic Chamber of Commerce)
 - (j) Service Organizations
- (iii) On a contract-by-contract basis, records will be maintained on all subcontract solicitations over \$100,000 indicating (a) whether Small Business was 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 was solicited, and if not, why not; (e) Small Disadvantaged Business was solicited, and if not, why not; (f) whether Woman-owned Small Business was solicited, and if not, why not; and (g) reasons for the failure of responding Small Businesses to receive the subcontract award.
- (iv) Records will be maintained on outreach efforts as follows:
 - (a) Contacts with Disadvantaged and Small Business trade associations.
 - (b) Contacts with business development organizations.
 - (c) Attendance at Small and Disadvantaged business procurement conferences and trade fairs.
 - (d) Veterans and disabled veterans service organizations
- (v) Records will be maintained on internal guidance and encouragement provided to buyers as follows:
 - (a) Workshops, seminars, training, etc.
 - (b) Monitoring performance to evaluate compliance with the program's requirements.
- (vi) Records will be maintained on a contract-by-contract basis to support award claim data submitted by the offeror to the Government, including the name, address, and business size of each subcontractor.

Signed: *Gary M. Breslau*

Name: Gary M. Breslau

Title: Manager of Procurement and SBLO

Date: November 3, 2003

PLAN ACCEPTED BY:

Signed: *Charlene Smith*

Typed Name: **Charlene Smith**
Contracting Officer

Date: *1/30/04*