National Nuclear Security Administration

NNSA Policy Letter: BOP-003.0305
Date: APR 1 1 2003

TITLE: NNSA Small Business Policy Guidance

I. OBJECTIVE:

Formally promulgate NNSA's policy and approach to contracting with America's Small Business Community.

II. APPLICABILITY: All NNSA elements.

III. POLICY:

The NNSA is fully committed to providing the entire small business community with the maximum practicable opportunity to provide the goods and services needed to support all of NNSA's programs and activities by reserving for small business:

a. All new non-management and operating (M&O) contract requirements, and
b. All expiring non-M&O contracts where the requirement continues.

IV. REQUIREMENTS:

1. Each Associate Administrator , Site Office Manager, and the Service Center Director must provide the Acting Administrator, through the Director Contracts Assessment and Systems (NA-63), a three-year strategic small business acquisition plan with goals for contracting with small businesses. This plan must be submitted 60 days before the end of the fiscal year and must be updated annually. An example is contained in Enclosure 1.
2. Site Office Managers are to ensure that aggressive subcontracting plan goals are negotiated in their M&O contracts in accordance with the contract terms and conditions.
3. Site Office Managers are to partner with their M&O contractors and the Service Center to review and analyze M&O contractor activities to identify non-core mission capabilities that can logically be acquired through other mechanisms such as through complex-wide strategic acquisitions by the Service Center or the Integrated Contractor Purchasing Team (ICPT). Similarly, NNSA must have visibility into M&O subcontracting actions so that NNSA can identify subcontracting transactions that are multi-site requirements and are appropriate for Service Center or ICPT award.

V. EXCEPTIONS

The only exception to the policy in section III.3 is if it is determined in accordance with section VI.2., that there:

a. are not two or more responsible small businesses that can provide the product or service; or,
b. exists compelling programmatic reasons i.e., unusual and compelling urgency, not to reserve the requirement for small businesses

VI. RESPONSIBILITIES:

1. The Administrator is responsible for establishing small business strategic direction and policy to meet NNSA's commitments to the Secretary on small business contracting goals.
2. The Deputy and Associate Administrators, Site Offices Managers, and the Service Center Director will ensure that this policy is aggressively implemented and plans are established to meet small business goals.
3. For transactions exceeding the simplified acquisition threshold, the Deputy or Associate Administrators, in consultation with the Director of Procurement and Assistance Management, are the only individuals who may make the determination to exempt a requirement from NNSA's small business policy. For transactions below the simplified acquisition threshold, the requirements of FAR Parts 19 and 13 are to be followed.
4. Service Center Contracting Officers will:
    a. orient market research towards locating responsible small businesses that are capable of fulfilling NNSA requirements.
    b. Partner with Site Office Contracting Officers and M&O contractors to identify opportunities for strategic purchase from small business.
    c. facilitate and promote small business teaming arrangements and joint ventures that will increase opportunities for small business participation in NNSA's procurements and subcontracts.
    d. not initiate solicitation activities for unrestricted competitions until they are provided the approved determination required by this Policy Letter.
5. Site Office Contracting Officers will:
    a. Partner with the Service Center and M&O contractors to identify opportunities for strategic purchase from small business.
    b. facilitate and promote small business teaming arrangements and joint ventures that will increase opportunities for small business participation in NNSA's procurements and subcontracts.

c. as part of the next substantial M&O contract modification, include a clause in the contract that fully involves the M&O contractor in the strategic purchasing and small business initiatives in section IV.3.

VII. REFERENCES:

1. Secretary Abraham's memorandum of September 23, 2002, *Policy Statement on Supporting Small Businesses in Implementing DOE Missions.* Attachment #1
2. Acting Administrator Brooks's memorandum of August 29, 2002, *NNSA Commitment to Small Business Programs* Attachment #2
3. Administrator Gordon's memorandum of March 18, 2002, *Enterprise Purchasing.* Attachment #3
4. Federal Acquisition Regulation Part 19, *Small Business Programs.*

VIII. Enclosure

1. NNSA Small Business Strategic Plan FY 03 – FY 05

IX POINT OF CONTACT FOR ADMINISTRATION POLICY LETTER:
Director, Office of Procurement and Assistance Management
(202) 586-7017.

BY ORDER OF THE ADMINISTRATOR:

Robert C. Braden
Senior Procurement Executive
National Nuclear Security Administration