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| CP3-PC-0110<br>FRev. 1 | TITLE:<br>Subcontract Planning and Control | Page 1 of 16 |
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## 1.0 PURPOSE AND SCOPE

### 1.1 Purpose

This procedure sets forth the organizational responsibilities and process for implementing Earned Value Management (EVM) requirements for planning, controlling, and reporting cost and schedule performance for subcontracted work. Subcontracts that meet the Government's requirements for EVM flowdown [an estimated contract value of $20 million or over with at least 12 months duration (not staff augmentation) and Firm Fixed Price (FFP)] are classified as major subcontracts. Service subcontracts and subcontracts with providers that supply staff augmentation personnel taking direction from the Project's supervisors, are not considered subcontractors or major subcontractors, regardless of the value or duration of the subcontract.

Four Rivers Nuclear Partnership, LLC, (FRNP) imposes EVM reporting requirements on all major subcontracts. While the full requirements of the EVM Guidelines may be imposed on certain cost type contracts, EVM data will be developed to determine Budgeted Cost for Work Scheduled (BCWS), Budgeted Cost for Work Performed (BCWP), Actual Cost of Work Performed (ACWP), and Estimates at Completion (ETCs) for every subcontractor (excluding vendors). Resulting performance data, and any significant problem analyses, are incorporated into project reports and reported to FRNP senior management and to the U.S. Department of Energy (DOE).

FRNP will flow down EVM requirements to subcontractors with contracts valued at less than $20 million using a graded approach.

If a major subcontractor is identified, it will become necessary to ensure it is included in the Organizational Breakdown Structure (OBS).

### 1.2 Scope

This procedure applies to the work scope included in the FRNP contract.

## 2.0 REFERENCES

### 2.1 Use References

- CP3-PC-0101, *Work Breakdown Structure, Organizational Breakdown Structure, Responsibility Assignment Matrix*
- CP3-PC-0102, *Baseline Change Control*
- CP3-PC-0103, *Cost Estimating*
- CP3-PC-0104, *Performance Measurement, Analysis and Reporting*
- CP3-PC-0105, *Planning and Scheduling*
- CP3-PC-0106, *Control Accounts, Work Packages, Planning Packages and Summary Level Planning Packages*
- CP3-PC-0107, *Work Authorization*
- CP3-FA-0002, *Unrecorded Liabilities*

### 2.2 Source References

- DOE Order 413.3B, *Program and Project Management for the Acquisition of Capital Assets*

- DOE Guide 413.3-10A, *Earned Value Management System (EVMS)*
- CP2-PC-0100, *FRNP Project Controls System Description*

## 3.0 COMMITMENTS

None

## 4.0 RESPONSIBILITIES

### 4.1 Senior Manager or designee

- Upon recommendation from the Control Account Manager (CAM), approves selection of subcontractor(s).
- Approves Variance Analysis Reports (VARs) containing subcontractor performance.

### 4.2 Control Account Managers

- Develops a work package (WP) or planning package for each anticipated subcontract or portion of a subcontract within a Control Account (CA) determining subcontractor cost and schedule reporting requirements based on subcontract type, estimated price, and schedule. Major subcontracts will have their own CAs.
- Submits a Purchase Requisition (PR) to the Business Manager/Procurement or Contracts for each subcontract, including cost and schedule reporting requirements.
- Evaluates responses/proposals for subcontractor's proposed work activities and approach, estimated cost, schedule and milestones.
- Upon subcontract award, replaces planning packages with WPs that reflect the subcontractor's schedules and cost.
- Develops Earned Value (EV) method to align with how work will be reported.
- Assures contract contains flowdown requirements (if applicable).
- Assures accruals (if required) are completed at each month end reporting period.
- Receives applicable performance reports from the subcontractor.
- Evaluates and verifies reported progress.
- Evaluates subcontractor progress.
- Incorporates subcontractor performance (BCWS, BCWP and ACWP) into the project Contract Performance Reports (CPRs).

### 4.3 Procurement/Contracts

- Issues Request for Proposal (RFP) that includes applicable cost and schedule reporting requirements and applicable flowdown requirements.
- Evaluates proposals for cost estimates and proposed statement of work (SOW).
- Negotiates payment methods and payment schedule.

### 4.4 Project Controls

- Assists the CAMs in preparation of CAs.

- Prepares cost performance reports and other status reports as necessary to assist the project in subcontract planning and control.
- Identifies subcontract cost and schedule variances, and assisting the project in variance analysis and reporting.

**4.5 Business Services Manager or designee**

- Upon receiving the PR from the CAM, reviews for completeness and ensures that the budget and charge code have been correctly identified.
- Obtains Senior Manager's signature approval.
- Forwards the PR to Procurement.

## 5.0 GENERAL INFORMATION

**5.1** The ability to effectively manage subcontractor effort is a vital part of FRNP overall management effort. The degree of subcontract management visibility and control varies with the degree of risk and impact to FRNP contract requirements. Subcontracts that meet the Government's requirements for EVM flowdown (FFP subcontracts with an estimated contract value greater than or equal to $20 million and a duration of 1 year or more) are classified as major subcontracts. Service subcontracts and subcontracts with providers that supply staff augmentation personnel taking direction from the Project's supervisors, are not considered subcontractors or major subcontractors, regardless of the value or duration of the subcontract. FRNP imposes EVM reporting requirements on all major subcontracts.

**5.2** Each major subcontract, except those that provide staff augmentation capabilities across many tasks, is considered an individual CA or WP with no single WP containing more than one subcontract. The CAM is assigned from the organization that requires the most direct control over the subcontractor.

## 6.0 INSTRUCTIONS

### 6.1 Major Subcontract EVMS Flowdown

**6.1.1** FFP subcontracts $20 million and greater

**Proposal Requirements:**
FRNP Procurement/Contracts ensures that DOE Order 413.3B and EAI-748 is included in the RFP in which EVM flowdown is required. The clause requires that each offeror present evidence of an existing EVMS to be used on the subcontract, which has been recognized by DOE as complying with the EVMS Guidelines or provides a comprehensive plan for compliance with the Guidelines.

**Contract Requirements:**
FRNP Procurement/Contracts ensures that DOE Order 413.3B and EAI-748 is included in the subcontracts to subcontractors in which EVM flowdown is required. The Order requires the use of an EVMS that has been recognized by DOE as complying with the Guidelines or requires the subcontractor to provide reporting data to FRNP that is consistent with EIA-748 requirements and the FRNP EVMS system. If that recognition has not occurred at the time of subcontract award, the subcontractor shall be prepared to demonstrate to FRNP that their EVMS complies with the Guidelines.

The subcontractor shall also be notified in the subcontract that an Independent Project Review (IPR) may be required.

The process of flowing down EVMS to the subcontractor is documented in Appendix B, Flowdown of EVMS to Subcontractors and described below:

**Senior Manager or designee**

1. Verifies the approved Work Breakdown Structure (WBS) and identify all items to be subcontracted and the selected subcontractors, if known.

**Procurement / Contracts / Control Account Manager / Project Controls**

2. Makes any changes to the Major Subcontractor candidate list as a result of subcontract negotiations.

**Senior Manager or designee**

3. In conjunction with DOE, as appropriate, reviews recommendations and approve or revises the requirement for EVMS.
4. If the determination is made that the subcontractor is not required to meet the EVMS Guidelines, then the subcontractor follows the steps in Appendix C, "Subcontractor Planning and Control Process Flowchart."

**Procurement/Contracts/Major Subcontractor**

5. When EVMS is determined to be required, FRNP Procurement/Contracts includes the appropriate clause(s) and SOW in the RFP and in the subcontract, and then negotiates them with the selected subcontractor. Requirements may include a specific reporting level of the WBS, VAR thresholds, and specific performance reporting formats. Project Controls provides negotiation assistance, as necessary.

**Major Subcontractor**

6. If the selected subcontractor does not already have an EVMS in place, the subcontractor prepares an EVMS Description and submits it to FRNP Procurement/Contracts for evaluation and acceptance. The assigned CAM, Senior Manager or designee, and Project Controls personnel are the primary evaluators of the subcontractor's EVMS Description. If the subcontractor has an existing validated EVMS, the subcontractor submits a copy of their EVMS Description, along with evidence of their validation (if required), to FRNP Procurement.

**Procurement/Contracts**

7. In the case of a non-validated EVMS, the subcontract administrator, in consultation with Project Controls and the CAM, either accepts the EVMS Description or recommends changes in accordance with subcontract provisions.

**Procurement/Contracts/ Project Controls/ Control Account Manager/ Major Subcontractor**

8. For non-validated EVMS, the subcontract administrator leads an on-site system review evaluation of the implementation of the EVMS Description and notifies the subcontractor of needed implementation changes or provides recognition of a successful implementation. The assigned CAM, Senior Manager or designee, and Project Controls participate in the evaluation of the subcontractor's EVMS. The local DOE office will be kept informed or be asked to participate, as necessary.

**Major Subcontractor**

9. Submits cost and schedules performance reports, as required by their subcontract.

**Control Account Manager**

10. Evaluates the subcontractor reports and provides data and information to the Senior Manager or designee, FRNP Procurement/Contracts, and/or Project Controls for input into the Project Controls System (PCS) databases.

**Project Controls**

11. Updates the appropriate databases, as necessary. In addition, within 90 days of subcontract award (if required), an IPR is scheduled at the subcontractor's location and is performed by FRNP Procurement/Contracts with assistance from the Senior Manager or designee, Project Controls, the responsible CAM(s), and local DOE, as necessary.

### 6.1.2 Non-FFP Subcontracts Less than $20M or FFP Subcontracts

- FRNP will employ a graded approach to flowing down EVMS to these subcontractors. If EVM is implemented on the subcontract, see Section 6.1.1 as to implementation steps.

## 6.2 Subcontract EVMS Related Reporting

### 6.2.1 Subcontractor Reporting for Major Subcontractors

- The RFP and the subcontract shall include the requirements for a CPR containing all formats required to meet the Project's performance reporting requirements to DOE.
- The submittal timing shall also be consistent with and supportive of the requirements the Project has with DOE.
- The WBS level of reporting, the OBS structure, the time periods for the baseline, staffing format, and the thresholds for variance reporting will be specifically identified in the subcontract.
- The Prime Contracts manager and the appropriate support personnel will negotiate these details in the final subcontract.

### 6.2.2 Subcontractor Reporting for Non-Major Subcontractors

- FRNP requires non-major subcontractors to submit sufficient schedule and estimated payment information to enable objective EV performance measurement information to be entered into the PCS.
- A tailored CPR may be required on non FFP subcontracts without an EVMS requirement where the subcontract value is significant and updated information is needed for the EAC.

## 6.3 Subcontract Control Account Planning, Earned Value and Actual Costs

- Subcontractor effort is included in network schedules, planned in a CA, and authorized via a separate Control Account Plan (CAP)/Work Authorization document, as required. This allows for summarization of the budget and performance measurement data to a WBS level prior to summarizing it with other subcontracts in the total Project organization level. Unless determined otherwise, the same CAM is responsible for all the CAs for a single subcontract.
- Each performance and reporting period, the CAM incorporates the subcontract data in the month that it is performed. This ensures that all Project performance data is integrated, consistent, and timely.

- Subcontractor invoices are submitted to FRNP Accounting and then forwarded to the appropriate CAM and the cognizant Buyer for approval.
- The CAM verifies that the invoiced work was authorized and accomplished; the Buyer verifies that the invoice has been submitted in accordance with payment provisions (e.g., correct rated) set forth in the negotiated subcontract, after which the subcontract cost is entered into the FRNP accounting system.
- The current period and cumulative to date ACWPs reported in the Project's monthly performance report will rarely be equal to the invoice amounts because of the processing time required to receive and approve the invoices. The CAM reconciles the invoices submitted against the actuals (accruals) reported in the monthly report, and is prepared to provide an analysis of the difference.
- All subcontract planning, performance measurement, and actual cost values include the subcontractor's fee or profit because it is part of the Project's cost. If the subcontractor submits reports at the cost level (i.e., excluding fee), FRNP calculates fee and adds it to the values provided by the subcontractor prior to entering into the PCS database.
- Subcontracts are normally budgeted by FRNP at the value of the subcontract. All data [with the exception of ACWPs and Estimates to Complete (ETC)] that is received from the subcontractor is factored using the following formulas prior to entering it into the PCS database.
  - Factor is equal to FRNP CA Budget at Completion/Subcontractor Budget at Completion
  - Factor is applied to Budget and EV but not to ACWPs and EACs.

### 6.3.1 Subcontract Planning: Budget

- For subcontracts that require a CPR, the CAM plans the subcontractor budget in accordance with the approved baseline plan provided by the subcontractor. Before the subcontractor's baseline plan is approved, FRNP will review and approve the schedule of values to ensure it is consistent with how the subcontractor plans to price and execute the work scope.
- The CAM adjusts the baseline plan received from the subcontractor to include the subcontractor's target fee/profit, if it has not already been included.
- If more than one CA per subcontract is required, then baseline reports are requested to include a baseline plan for each Project CA.
- The CAM incorporates the subcontract data in the month that work is performed rather than delay reporting by one month.
- Subcontractor Management Reserve (MR) and Undistributed Budget (UB) values are normally not time phased. These values are held at the planned end of the subcontract in one accounting period as a separate WP or included as separate entries to the Project's MR and UB. If they are included in the Project's MR and UB, they are separately reported in all summary reports as the subcontractor's data to avoid misleading FRNP senior management or DOE. Using a separate WP is the preferred method because it provides a direct relationship between the CA/WP budget and the subcontractor's total contract value.
- Subcontract CAs that do not require performance reporting are developed by the responsible CAM. The CA Performance Measurement Baseline may be based on the subcontractor's

payment plan, a major milestone or delivery schedule, or other available information (target fee/profit included).

- The use of auditable physical completions is emphasized to increase the accuracy of the time-phased budget plan for performance measurement. The CAM must be able to explain the basis for budget and must measure performance (Earned Value) in the same manner as planned.
- For Time and Material (T&M) subcontracts and FFP subcontracts that have no progress payments, the CAM develops the budget on the subcontractor's expenditure plan and the EV Technique is Level of Effort (LOE) or Percent Complete.

### 6.3.2 Subcontract Performance Measurement: Earned Value

- EV for subcontracts that provide CPRs is determined consistent with the way work is planned, and is derived directly from those validated reports. Validation consists of verifying that progress/performance is consistent with what was reported. Again, the information is adjusted to include the subcontractor's target fee/profit if the performance report has been provided at the cost level.
- The EV for subcontracts that do not require performance reporting is developed by the responsible CAM on the same basis that the work and budget were planned.
- For fixed price subcontracts, EV is the subcontract payment schedule value of liquidation or milestone payments received and approved for payment during the month if the budget was based on the milestone payment plan.
- T&M subcontracts claim EV using LOE method or Percent Complete method. For FFP subcontracts that have no progress payments, EV is based on actual deliveries or major completions.

### 6.3.3 Subcontract Actual Cost

- ACWP for subcontracts that provide CPR is derived directly from those reports. As with budget and EV, this information is adjusted to include the subcontractor's target fee/profit if the performance report has been provided at the cost level.
- The Business Management Organization is responsible for reconciling the Actual Cost provided in the performance reports with the subcontractor's invoices or the actuals in the formal accounting records.
- For FFP subcontracts, accruals are used and are reconciled to the formal accounting records by the CAM.
- In cases where the CA or WP budget is equal to the subcontractor's negotiated target price, the actual cost is equal to the EV because no Cost Variance can be generated.

## 6.4 Subcontractor Variance Analysis and Estimates at Completion

A VAR is generated for all subcontract CAs that exceed the established thresholds. The CAM completes the VAR following the normal review and approval cycle described in Section 6.3, *Variance Analysis and Reporting* in CP3-PC-0104, *Performance Measurement, Analysis and Reporting*.

### 6.4.1 Subcontracts with a Contract Performance Report

- The CAM completes the variance analyses for the CA containing subcontracted effort.

- When the subcontractor submits their monthly CPR, the CAM conducts a thorough review and assessment of the data and uses the included variance analysis information as a source for the CA VAR.
- As part of the CAM's monthly analysis review, the subcontractor reported EAC is reviewed by the CAM and the subcontractor management team.
- Based on this analysis, the CAM will either submit the value as reported (adjusted to include the subcontractor's fee) or reflect an independent EAC value depending on whether or not the CAM agrees with the subcontractor's EAC.
- Whichever EAC value is used, it must be supported by the subcontract CAM.
- Any time the EAC changes, it must be approved by the Senior Manager or designee in the same manner as changes to EACs experienced in internal CAs (CP3-PC-0104, *Performance Measurement, Analysis and Reporting*).
- With rare exception, subcontractor EACs must take into account the subcontractor's latest ETC. On Major Subcontracts having a CPR flowdown requirement, the EAC is specifically called for as part of the reporting requirement.

### 6.4.2 Subcontracts without a Contract Performance Report

- On other subcontracts, the project assures that a subcontract ETC/EAC is provided periodically if the subcontract is an incentive or cost plus subcontract. The subcontractor should prepare a comprehensive ETC at least annually and must consider the following:
    - An assessment of the progress on the Project,
    - An evaluation of any economic changes affecting the Project (e.g., labor rates), and
    - On FFP subcontracts, the time-phased spend plan as adjusted for current conditions usually will suffice as an ETC/EAC forecast.

## 6.5 Subcontract Reviews and Surveillance

- The CAM/Subcontract Administrator coordinates the required reviews and/or surveillance at the subcontractor's location.
- For EVMS subcontracts requiring government validation, FRNP Contracts or representative organizes the review, including coordination with the appropriate government reviewers, internal EVMS experts, and FRNP personnel.
- For EVMS subcontracts not requiring government validation, FRNP contracts or representatives organize the reviews in conjunction with the subcontractor's EVMS staff and Project personnel.

## 6.6 Subcontract Planning and Control Process Flow

The initial work authorization process is described in greater detail in CP3-PC-0107, *Work Authorization.* Refer to Appendix C, "Subcontract Planning and Control Process Flowchart."

**<u>Control Account Manager</u>**

1. Identifies potential subcontractors who will be used to perform some of the work within the CAP scope of work. Subcontractors that provide staff support to the project but who provide no direct supervision of the staff supplied are not considered "subcontractors" for the purposes of EVMS.

**Project Controls, QA/ Contracts/Business Management**

2. Assist the CAM in the identification of subcontractors for approval and recommend the selected subcontractors for approval by the Senior Manager of designee.

**Senior Manager or designee**

3. Approves the selected subcontractors or returns the recommendation for reconsideration.

**Control Account Manager/Subcontractor**

4. The selected subcontractor(s) submits baseline plans in accordance with the provisions of the subcontract and the Subcontract Schedule requirements. The CAM, using these plans, prepares CAP(s) for their CAs that include the subcontractor baseline plans. The subcontractor's efforts are integrated with and entered into the Subproject Schedule and into the CAP.

**Project Controls/Subcontractor**

5. Enters the baselines plans into the PCS database.
6. Performs work in accordance with the subcontract and submits the required performance and forecast reports.

**CAM**

7. Determines if there is an EVMS requirement.
8. **IF** there is an EVMS requirement, **THEN** receives the subcontractor performance and forecast reports, evaluates them, and provides the information and evaluation to the Senior Manager or designee and to Project Controls for input into the appropriate PCS database(s).
9. **IF** the subcontractor does not have an EVMS reporting requirement, **THEN** evaluate the subcontractor's progress based on factors previously established during the CAP planning process and report that performance as part of the overall performance status of the CA.

**Project Controls**

10. Enters the earned value performance data into the PCS database(s).
11. For those CAs that exceed established variance analysis thresholds, prepares and distributes VAR forms and sends them to the responsible CAMs.

**CAM/Project Controls/Senior Manager or designee**

12. Using their knowledge of the subcontractor's status and the reports received, completes the VAR form and submits it through Project Controls for review and tracking, and on to the Senior Manager or designee for review and approval.

**Senior Manager or designee**

13. Either approves the VAR or returns it to the CAM with comments.

**Project Controls**

14. Once the VAR is approved, the information is included in reports DOE, as appropriate.

## 7.0 RECORDS

### 7.1 Records Generated

The following records may be generated by this procedure:

None

Forms (if applicable) are to be completed in accordance with CP3-OP-0024, *Forms Control*.

### 7.2 Records Disposition

The records are to be maintained in accordance with CP3-RD-0010, *Records Management Process*.

**Appendix A – Acronyms/Definitions**

## ACRONYMS

| | |
|---|---|
| ACWP | Actual Cost of Work Performed |
| AUW | Authorized Unpriced Work |
| BAC | Budget at Completion |
| BCR | Baseline Change Request |
| BCWP | Budgeted Cost for Work Performed |
| BCWS | Budgeted Cost for Work Scheduled |
| BOE | Basis of Estimate |
| CA | Control Account |
| CAM | Control Account Manager |
| CAP | Control Account Plan |
| CAS | Cost Accounting Standards |
| CBB | Contract Budget Base |
| CCB | Change Control Board |
| CLIN | Contract Line Item Number |
| CO | Contracting Officer |
| COTS | Commercial-Off-the-Shelf |
| CPB | Contract Performance Baseline |
| CPI | Cost Performance Index |
| CPR | Contract Performance Report |
| CV | Cost Variance |
| DEAR | Department of Energy Acquisition Regulation |
| DOE-PPPO | DOE-Portsmouth/Paducah Project Office |
| EAC | Estimate at Completion |
| EIA | Electronic Industries Alliance |
| ESH&Q | Environment, Safety, Health, and Quality |
| ETC | Estimate to Complete |
| EV | Earned Value |
| EVM | Earned Value Management |
| EVMS | Earned Value Management System |
| EVT | Earned Value Technique |
| FAR | Federal Acquisition Regulation |
| FFA | Federal Facility Agreement |
| FFP | Firm Fixed Price |
| FRNP | Four Rivers Nuclear Partnership, LLC |
| G&A | General and Administrative |
| IPABS | Integrated Planning, Accountability, and Budgeting System |
| IPABS-IS | Integrated Planning, Accountability, and Budgeting System-Information System |
| IPS | Integrated Project Schedule |
| IPT | Integrated Project Team |
| LOE | Level of Effort |
| MPR | Monthly Performance Report |
| MR | Management Reserve |
| NDIA | National Defense Industrial Association |
| NTE | Not-To-Exceed |
| OBS | Organizational Breakdown Structure |
| ODC | Other Direct Costs |
| P6 | Primavera Project Planner |
| PBI | Performance Based Incentive |

PCS Project Controls System

**Appendix A – Acronyms/Definitions (continued)**

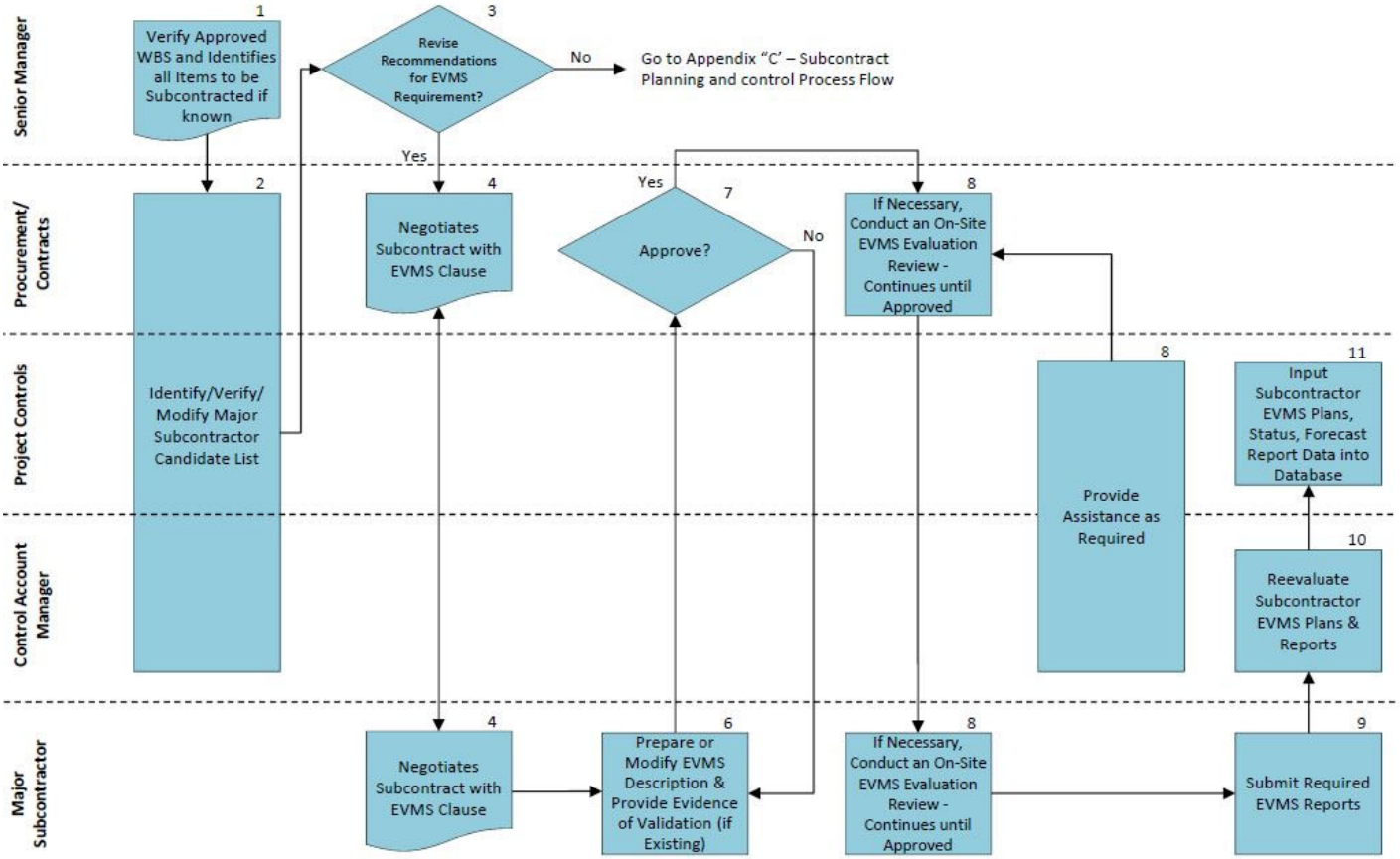
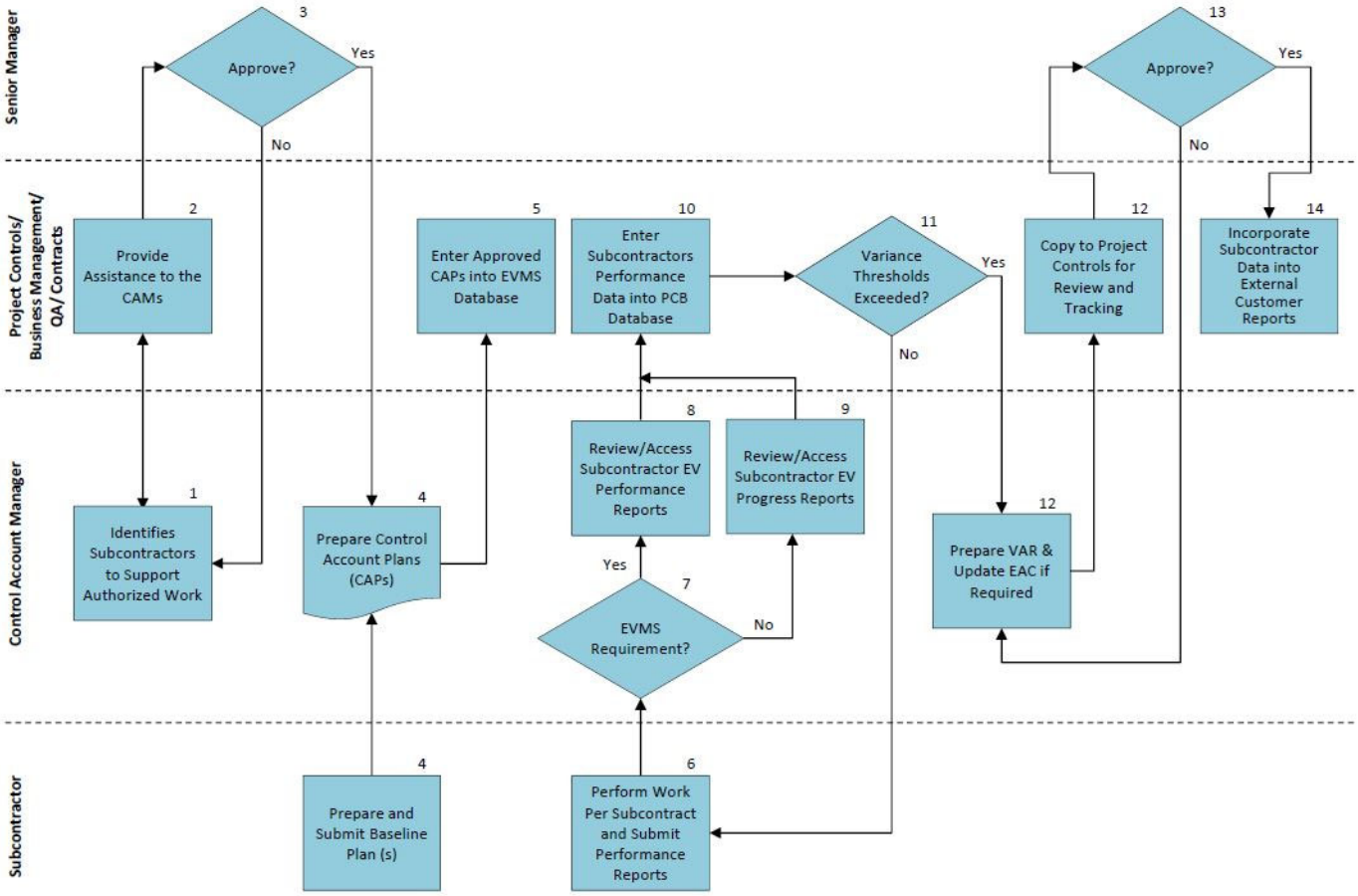
| | |
|---|---|
| PCSD | Project Controls System Description |
| PEP | Project Execution Plan |
| PGDP | Paducah Gaseous Diffusion Plant |
| PMB | Performance Measurement Baseline |
| PMP | Project Management Plan |
| PMSC | Program Management Systems Committee |
| P&O | Planning and Optimization |
| PXP | Project Level Execution Plan |
| PWS | Performance Work Statement |
| RAM | Responsibility Assignment Matrix |
| RFP | Request for Proposal |
| S&M | Surveillance and Maintenance |
| SLPP | Summary Level Planning Package |
| SME | Subject Matter Experts |
| SOW | Statement of Work |
| SPI | Schedule Performance Index |
| TCPI | To-Complete Performance Index |
| TPC | Total Project Cost |
| UB | Undistributed Budget |
| USDOE | U.S. Department of Energy |
| VAC | Variance at Completion |
| VAR | Variance Analysis Report |
| WBS | Work Breakdown Structure |

## DEFINITIONS

See DOE EVMS Guidance

https://energy.gov/projectmanagement/services-0/earned-value-management/evms-implementation-guidance

## Appendix B – Flowdown of EVMS to Subcontractors



## Appendix C – Subcontract Planning and Control Flow Chart