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2023 BIE SUSTAINABLE PROCUREMENT PLAN

JUNE 2023

ISSUING OFFICIAL'S SIGNATURE

Type of Document:	Plan
Subject/Title:	BIE SUSTAINABLE PROCUREMENT PLAN
Associated Authority:	Secretarial Order 3407
Scope: BIE Procurement Activities Related to Single Use Plastic Products	
Description: This is the 2023 BIE Sustainable Procurement Plan that is required by the Department of Interior to implement Secretarial Order (SO) 3407: Department-Wide Approach to Reducing Plastic Pollution, signed June 8, 2022.	

Version History	Issue Date	Description and Summary	Approved By:
1		Final	BIE Chief Sustainability Officer

BIE Chief Sustainability Officer	Signature and Date
X <u>PEARL CHAMBERLIN</u> Digitally signed by PEARL CHAMBERLIN Date: 2023.06.07 11:54:06 -06'00'	Date

BIE Deputy Bureau Director, School Operations	Signature and Date
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I. Executive Summary

The purpose of this plan is to develop and implement a strategy to meet the intent of Secretarial Order (SO) 3407: Department-Wide Approach to Reducing Plastic Pollution, signed June 8, 2022 (See Appendix A). This Order prioritizes Department of the Interior action to reduce the amount of plastic waste produced by the Department in support of the goals of Executive Order (EO) 14057, "Catalyzing Clean Energy Industries and Jobs through Federal Sustainability," and to further reestablish the Federal Government as a leader in sustainability. Secretarial Order (SO) 3407 directs Bureaus to develop a sustainable procurement plan to phase out single-use plastic (SUPs) products by the end of 2032.

The scope of this plan is limited to the boundaries of the nineteen BIE administrative facilities and 183 Bureau-funded elementary and secondary schools. Of these, approximately 55 are BIE operated schools (BOS) and 128 are tribally controlled schools (TCS). The BIE also directly operates two postsecondary institutions: Haskell Indian Nations University (HINU) and Southwestern Indian Polytechnic Institute (SIPI).

Key to this plan is the establishment of a cross-functional team with staff from:

- BIE Branch of Environmental Management (BEM),
- BIE Branch of Property Management (BPM),
- BIE Division of Acquisition Management,
- BIE Branch of Finance Management (BFM),
- BIE Grants Division,
- Educational Program Administrator(s),
- BIE Central Office Representative.

The team will identify roles and responsibilities, authorities, and accountabilities for each representative and develop a statement of goals and objectives for the cross-functional team.

Because the BIE has not tracked SUP procurement in the past, the cross-functional team will focus its initial efforts on research, data collection, procurement guidance review, educational awareness, and pilot study development. Table 1 provides a detailed outline of milestones and target dates. The BIE will review this plan annually to incorporate strategy developments, progress toward targets, and best management practices adopted by the Department, as established by the Plastics Community of Practice and similar working groups. BIE BEM commits to participating in these working groups for the continued benefit of BIE.

II. Addressing the Reduction of Procurement, Sale, and Distribution of Single-Use Plastic Products

The BIE plans to conduct research, data collection, identification of feasible alternatives, and development of educational/marketing materials starting in Third Quarter Fiscal Year (FY) 2023 through FY2024. The BIE will also coordinate with Acquisitions on appropriate timeframes for implementation of revised procurement guidance, to be distributed by First Quarter FY2024. Once sufficient supporting information is compiled and analyzed, the BIE will begin to implement the SUP phase out. The BIE will consider the following strategies:

- Conduct a pilot study at one to three Bureau operated facilities to evaluate the feasibility of phase out by September 2024.
- Identify education facilities that procure larger quantities of plastics via contracting mechanisms and determine opportunity for higher quantity reductions by Second Quarter FY2025 (including contracts and micro-purchases).
- Implement Bureau-wide phase out strategies for Bureau Operated Schools (BOS) and administrative facilities, starting First Quarter FY2025.
- Implement phase out at Tribally Controlled Schools (TCSs), starting in FY2026.

The following table and timeline list the various milestones and target dates identified in this Procurement Plan.

MILESTONE	TARGET START DATE	TARGET COMPLETION DATE	LEAD OFFICE
Initial Awareness Training (as opportunities present)	Q3 FY2023	Q2 FY2024	BEM
Establish Cross Functional Team	Q3 FY 2023	Q4 FY2023	BEM
Review Bureau-Level Charge Card Policy	Q4 FY2023	Q1 FY2024	Acquisitions with Property
Revised Procurement Guidance Memo (including Government Charge Card Use Guidance)	Q1 FY2024	Q2 FY2024	BEM with Acquisitions
Start Providing Contract Oversight (new procurements)	Q2 FY2024	On-going	Acquisitions
Coordinate Research, Data Collection (BOS-focused)	Q4 FY2023	Q2 FY2025	BEM
Coordinate Research, Data Collection (remaining TCSs)	Q4 FY2023	Q4 FY2025	BEM

Review of Contract Data	Q4 FY2023	Q1 FY2024	Acquisitions
Establish System to Track and Report on Contracted Procurements	Q2 FY2024	Q2 FY2024	Acquisitions
Develop interview or survey protocol	Q2 FY2024	Q2 FY2024	BEM
Evaluate Data - Create Procurement and Waste Stream Profiles for Each BIE Entity - Identify Largest Consumers of SUP	Q4 FY2023	Q2 FY2025	BEM with Acquisitions
Analysis of Feasible Alternatives – Limiting Factors	Q2 FY2024	Q4 FY2025	BEM with Acquisitions
Identify Exemptions	Q2 FY2024	Q4 FY2025	Team
Evaluate the Need for Funding Requests and Associated Processes	Q2 FY2024	Q4 FY2025	BIE Facilities, with Team
Establish Data Driven Targets	Q2 FY2025	Q1 FY2026	Team
Develop Education Campaign - Marketing Materials - Training	Q2 FY2024	Q4 FY2025	BEM
Pilot Study	Q1 FY2024	Q4 FY2024	BEM
Bureau-Wide Roll-Out (BOS/Admin) with Revised Education and Training (to incorporate the targets, etc.)	Q1 FY2025	Q4 FY2030	BEM
TCS Roll-Out	Q1 FY2026	Q4 FY2030	BEM

TABLE 1. BIE SUSTAINABLE PROCUREMENT PLAN MILESTONES AND TARGET DATES

MILESTONES	Q3 FY23	Q4 FY23	Q1 FY24	Q2 FY24	Q3 FY24	Q4 FY24	Q1 FY25	Q2 FY25	Q3 FY25	Q4 FY25	Q1 FY26	Q2 FY26	Q3 FY26	Q4 FY26	Q1 FY27	Q2 FY27	Q3 FY27	Q4 FY27	Q1 FY28	Q2 FY28	Q3 FY28	Q4 FY28	Q1 FY29	Q2 FY29	Q3 FY29	Q4 FY29	Q1 FY30	Q2 FY30	Q3 FY30	Q4 FY30								
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FIGURE 1. BIE SUSTAINABLE PROCUREMENT PLAN MILESTONES AND TARGET DATES

III. Updates to Acquisition and Procurement Policies and Practices

The BIE conforms to green procurement policies, which address similar sustainability requirements as the SO. The BIE does not anticipate a revision to procurement policy is required to implement phase out of SUPs at the Bureau level. The BIE will issue a memo to expedite implementation in accordance with this Procurement Plan. The BIE will also develop guidance on government charge card use to reduce, limit, and restrict the purchase of SUPs. Once oversight of charge cards is moved to BIE Acquisitions, BIE must set up a review and approval process.

The cross-functional team will develop the revised procurement guidance memo to emphasize requirements for reducing SUP in accordance with the SO. Revisions may include changes to procedural elements, such as BIE BPM compliance reviews in the Financial and Business Management System (FBMS) for charge card purchases that exceed certain dollar amounts and a review and approval process for Purchase Requisitions. The memo may also include required contract language or provisions for inclusion in future solicitations. Under the revised guidance, the BIE Acquisitions team can also direct schools and Administrators to include requirements to reduce SUPs.

MILESTONE	TARGET START DATE	TARGET COMPLETION DATE	LEAD OFFICE
Review Bureau-Level Charge Card Policy	Q4 FY2023	Q1 FY2024	Acquisitions with Property
Revised Procurement Guidance Memo (including Government Charge Card Use Guidance)	Q1 FY2024	Q2 FY2024	BEM with Acquisitions

TABLE 2. MILESTONES AND TARGET DATES - ACQUISITION AND PROCUREMENT

IV. Data Collection Methods, Metrics, and Reporting Requirements

The BIE will identify and evaluate sources of SUPs procurement at the elementary and secondary schools, post-secondary schools, and BIE administrative facilities. To do this, BIE will consider various data collection methods using existing mechanisms within Acquisitions and

other BIE functions, such as contract and food service agreement reviews (e.g., product service codes and North American Industry Classification System (NAICS) codes) can be used to help identify SUP procurement activities and charge card purchases and associated invoicing.

BIE will also conduct interviews or develop a survey protocol to request information from schools and other facility-level staff to validate and parse data from Acquisitions reviews. Final procurement rates will be determined at the facility level. Using this information, BIE will characterize SUP procurement and waste stream profiles for each BIE facility.

Once supporting documentation for procurement rates is compiled, the BIE will establish data-driven targets that are feasible based on limiting factors, to be identified by Acquisitions and facility requirements. Limiting factors may include but are not limited to the following:

- Existing multi-year contracts.
- Product service codes and NAICS codes do not refer to specific items, but categories of items.
- Product service codes and NAICS codes do not track quantity of items, only dollar amounts.
- Changes to DOI-AAAP.
- Property restrictions.
- Annual funds distribution schedule.
- Limited operation and maintenance budgets and associated cost impact of transitioning to alternatives.
- Work Order funding and project development/management.

BIE procurement mechanisms involve purchase requisitions, purchase orders, blanket purchase agreements, and indefinite deliverable and indefinite quantity (IDIQ) contracts that provide opportunities for monitoring by the BIE Division of Acquisitions. Acquisitions will provide contract oversight to ensure SUP reductions are maximized based on the requirement. However, modifications to existing contracts, especially for multi-year food and dairy services, may pose a challenge for timely modification, re-solicitation, and implementation of this Procurement Plan. For example, as of FY2023, six contracts are in the first year of five-year contracts for food and dairy delivery.

The BIE will evaluate each contract requirement to identify opportunities to reduce or eliminate SUP procurement. Requirements of this Procurement Plan and its work products will be included in future solicitations. The BIE Division of Acquisitions will establish a system to

track and report on contracted procurements based on service code or NAICS code.

The cross-functional team will identify appropriate targets based on the type and amount of data available, e.g., percent reduction in dollars spent towards certain categories of purchases. The team will also decide which entity needs to report, the specific data points, and reporting format and mechanisms.

The BIE will apply the most impactful data-driven measures to reduce SUPs procurement as identified by stakeholders. Using data provided by Acquisitions and facilities, the BEM will target those with the highest dollar value or quantity of SUP procurements. The BIE will also evaluate administrative buildings where BIE and BIA are co-located and collaborate with local BIA personnel on facility-specific efforts to reduce SUPs.

MILESTONE	TARGET START DATE	TARGET COMPLETION DATE	LEAD OFFICE
Start Providing Contract Oversight (new procurements)	Q2 FY2024	On-going	Acquisitions
Coordinate Research, Data Collection (BOS-focused)	Q4 FY2023	Q2 FY2025	BEM
Coordinate Research, Data Collection (remaining TCSs)	Q4 FY2023	Q4 FY2025	BEM
Review of Contract Data	Q4 FY2023	Q1 FY2024	Acquisitions
Establish System to Track and Report on Contracted Procurements	Q2 FY2024	Q2 FY2024	Acquisitions
Develop interview or survey protocol	Q2 FY2024	Q2 FY2024	BEM
Evaluate Data - Create Procurement and Waste Stream Profiles for Each BIE	Q4 FY2023	Q2 FY2025	BEM with Acquisitions

Entity - Identify Largest Consumers of SUP			
Analysis of Feasible Alternatives – Limiting Factors	Q2 FY2024	Q4 FY2025	BEM with Acquisitions
Establish Data Driven Targets	Q2 FY2025	Q1 FY2026	Team

TABLE 3. MILESTONES AND TARGET DATES - DATA COLLECTION, METRICS, AND REPORTING

V. Analysis of Alternatives to Single-Use Plastic Products

The BIE will analyze alternatives to SUP, such as compostable or biodegradable materials, or 100% recyclable, or 100% recycled materials. The team will then define which alternatives are feasible based on the BIE mission and operations. The facilities will define which alternatives are feasible, based on their requirements, delivery schedules, and resources available such as budget and storage capacity. Acquisitions will not specify alternatives for facilities, but it can assist with soliciting alternatives from vendors and revising blanket purchase agreements or other contracts to include alternative requirements. The cross-functional team will also identify and apply other limiting factors to the selection of alternatives.

The BIE will coordinate with facilities to determine what, if any, recycling services are available and how alternatives may be impacted. The BIE anticipates many challenges regarding access to recycling services, because many BIE facilities are in remote locations, but will maximize their utility in the identification of alternatives, where feasible.

MILESTONE	TARGET START DATE	TARGET COMPLETION DATE	LEAD OFFICE
Analysis of Feasible Alternatives – Limiting Factors	Q2 FY2024	Q4 FY2025	BEM with Acquisitions

TABLE 4. MILESTONES AND TARGET DATES - ALTERNATIVES TO SUPS

VI. Shifting Public Behavior to Reduce Single-Use Plastic Products

The team will develop educational outreach to schools and other BIE support staff responsible for identifying requirements and executing procurement activities. The BEM will identify the appropriate audience for education and training opportunities and tailor training and marketing

materials appropriately. In developing the training content, the BEM will consider the following:

- Tie the requirement to impacts on the environment.
- Emphasize the policy driver.
- Clearly identify next steps for schools in the requirement planning and acquisitions process.
- Lessons learned from pilot studies.
- Per- and Polyfluoroalkyl Substances (PFAS) considerations in plastic food containers.

The BEM will explore opportunities to provide training at events, such as Principal Leadership Institutes and Academies and Facilities Operation boot camps and will coordinate with the BIE Communications Office on other avenues to promote awareness. The cross-functional team will explore creative ways to engage staff and solicit timely compliance with the new guidance and opportunities to reward compliance. The cross-functional team will also work with the BIE Division of Acquisitions and BIE Branch of Property Management on methods to shift public behavior to reduce SUPs.

Initial awareness training will begin as early as Third Quarter FY 2023, when opportunities present. The BIE Division of Acquisitions can also provide training as approved by the Director’s Office to ensure the effective distribution of revised procurement guidance. More training information will become available as the plan is developed and implemented.

MILESTONE	TARGET START DATE	I. TARGET COMPLETION DATE	LEAD OFFICE
Initial Awareness Training (as opportunities present)	Q3 FY2023	Q2 FY2024	BEM
Develop Education Campaign - Marketing Materials - Training	Q2 FY2024	Q4 FY2025	BEM

TABLE 5. MILESTONES AND TARGET DATES - SHIFT PUBLIC BEHAVIOR

VII. Single-Use Plastic Short-Term Exemptions

The cross-functional team will evaluate scenarios in which short-term exemptions to this Procurement Plan are acceptable and documented for application.

MILESTONE	TARGET START DATE	TARGET COMPLETION DATE	LEAD OFFICE
Identify Exemptions	Q2 FY2024	Q4 FY2025	Team

TABLE 6. MILESTONES AND TARGET DATES - SHORT-TERM EXEMPTIONS

VIII. Single-Use Plastic Exemptions for Medical, Public Safety, Public Health, or Scientific Items

The cross-functional team will evaluate scenarios in which exemptions to this Procurement Plan are acceptable and documented for application, e.g., schools may request exemptions in response to water quality and quantity issues (such as failure of water wells, water main breaks, PFAS exceedance, etc.).

MILESTONE	TARGET START DATE	TARGET COMPLETION DATE	LEAD OFFICE
Identify Exemptions	Q2 FY2024	Q4 FY2025	Team

TABLE 7. MILESTONES AND TARGET DATES - OTHER EXEMPTIONS

IX. Funding Requests

The cross-functional team will evaluate the need for funding requests and identify an appropriate process for implementation of the Sustainable Procurement Plan. The team will also evaluate the need for a process for schools to request additional funding for alternatives. At the time this plan was prepared, no additional funding has been identified to offset increased costs that may be encountered by pursuing alternatives. The team will evaluate Indian Affairs' ability to prioritize funding for implementation of this Procurement Plan, e.g., conversion of schools to bottle filling stations will trigger work orders and associated funding process which may not be funded in a timely manner due to deferred maintenance work order backlog and availability of project managers.

MILESTONE	TARGET START DATE	TARGET COMPLETION DATE	LEAD OFFICE
Evaluate the Need for Funding Requests and Associated Processes	Q2 FY2024	Q4 FY2025	BIE Facilities, with Team

TABLE 8. MILESTONE AND TARGET DATES - FUNDING REQUESTS