



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
OFFICE OF THE ASSISTANT SECRETARY  
MANPOWER AND RESERVE AFFAIRS  
111 ARMY PENTAGON  
WASHINGTON DC 20310-0111

November 28, 2000

Exemption Number 2000-0003

MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY  
(MILITARY PERSONNEL POLICY)

SUBJECT: Medical Exemption

Reference, memorandum, w/endorsement, TSG, DASG-PAE-M, 31 October 2000, subject: Request for Exemption – U.S. Army Medical Command (MEDCOM).

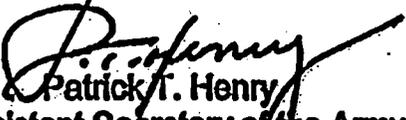
I have determined that the medical function performed by the military personnel assigned to MEDCOM and within the operating forces is a non-inherently Governmental function that should be exempted from private sector performance on the basis of risk to national security. The exemption applies to officers, warrant officers and enlisted personnel providing or supporting direct patient care in the operating forces and in MEDCOM organizations with the same skills identified as requirements in the operating forces. The exemption includes tertiary care provided by Army medicine to the U.S. Air Force and U.S. Navy in any theater. It does not apply to civilian employees providing or supporting the direct patient care medical function in MEDCOM. The criteria for identifying this exemption are described at the enclosure. Military personnel performing this function are not reported in the public Federal Activities Inventory Reform Act (FAIR) inventory.

As pointed out in the referenced memorandum, contractors and civilian employees are needed to assist in providing and supporting direct patient care to an expanding beneficiary population, which now includes enhanced health care and pharmacy benefits for Medicare-eligible retirees pursuant to the National Defense Authorization Act for fiscal year 2001. The Army has historically used contract medical personnel in major conflicts up through the Persian Gulf War. The Army doctrine under review in this exemption request, in Army Field Manual 100-21, *Contractors On The Battlefield (March 2000)*, currently provides that some combat health support capability may be augmented by contractor support in the areas of food service, laundry, waste disposal, medical maintenance, optical fabrication, materiel handling equipment, oxygen generation, environmental and occupational health assessment, water purification assessment, application of pesticides for disease control, veterinary services and laboratory services — depending upon the nature of the host nation medical infrastructure. In addition, your endorsement suggests that contracting for western-trained civilian providers to work in host nation hospitals, as happened in Saudi Arabia, and contracting for civilian providers to fill vacancies in Reserve Component medical units may be appropriate in some circumstances.

However, the referenced endorsement points out that, in general, the historical record indicates that extensive reliance on contracted medical support increases the risks of poor quality medical care provided to soldiers in the field. Most battlefield deployments are to second and third world areas, in circumstances where the Army and warfighting Commanders in Chief cannot contract for modern health care. For example, in Mogadishu, Somalia, Army medicine was the only health care in the region.

Accordingly, it is prudent for the Army to maintain a core capability of uniformed military trained in military medical principles that is ready and available to deploy to theaters of potential conflicts. The utilization of this core capability to help provide peacetime medical care to retirees, military dependents and non-deployed military assigned to garrisons in peacetime is a sound business decision that also maintains the proficiency and currency of the medical skills also required in theater. As senior officials with technical responsibility for the military medical function, the analysis of the risks involved by The Surgeon General, and your concurrence in that analysis, are entitled to great weight, as are your judgments that converting these functions to contract will compromise military readiness. Therefore, I have exempted military needed to maintain this core capability from conversion to contract.

I also noted The Surgeon General's concerns with the potential adverse impact of the A-76 process on the quality of direct patient care provided by his military, civilian employees and contractors, and his concerns with the application of A-76 to medical Research, Development, Testing and Evaluation (RDT&E) functions currently performed in-house within MEDCOM RDT&E organizations. Office of Management and Budget (OMB) Circular A-76 provides for an exemption from A-76 procedures for direct patient care activities at Government hospitals or other healthcare facilities to assure quality of care. It also provides for an exemption from A-76 procedures for the conduct of research and development other than severable in-house commercial activities in support of research and development. Therefore, both the direct patient care function and the basic RDT&E function, less support, will be reported in the FAIR Act Inventory under OMB Reason Code C. OMB Reason Code C is designed to identify specific non-inherently Governmental (commercial) activities that may be converted to contract, but not by means of the A-76 process.

  
Patrick T. Henry  
Assistant Secretary of the Army  
(Manpower and Reserve Affairs)

Enclosure

### National Security Exemption (Medical)

National Security exemption will affect all officer positions in the following skills:

05A-Branch Immaterial	60A-Operational Medicine	60B-Nuclear Medicine Officer
60C-Preventive Medicine Officer	60J-Obstetrician & Gynecologist	60K-Urologist
60L-Dermatologist	60N-Anesthesiologist	60P-Pediatrician
60S-Ophthalmologist	60T-Otolaryngologist	60V-Neurologist
60W-Psychiatrist	61A-Nephrologist	61F-Internist
61G-Infectious Disease Officer	61H-Family Physician	61J-General Surgeon
61K-Thoracic Surgeon	61M-Orthopedic Surgeon	61N-Flight Surgeon
61R-Diagnostic Radiologist	61U-Pathologist	61Z-Neurosurgeon
62A-Emergency Physician	62B-Field Surgeon	63A-General Dentist
63B-Comprehensive Dentist	63D-Periodontist	63B-Endodontist
63F-Prosthodontist	63H-Public Health Dentist	63N-Oral Maxillofacial Surgeon
63R-Executive Dentist	64A-Field Vet Svc	64B-Vet Preventive Med
64D-Veterinary Pathology	64F-Vet Comparative Med	64Z-SR Veterinarian (IM)
65A-Occupational Therapy	65B-Physical Therapy	65C-Dietitian
65D-Physician Assistant	66C-Psychiatric/MH Nurse	66B-Operating Room Nurse
66F-Nurse Anesthetist	66H-Medical/Surgical Nurse	66N-Generalist Nurse
67A-Health Services	67B-Laboratory Sciences	67D-Behavioral Sciences
67E-Pharmacy	67F-Optometry	67G-Podiatry
67J-Aeromedical Evacuation	70A-Health Care Administration	70B-Health Services Admin
70C-Health Services Comptroller	70D-Health Services Sys Mgt	70E-Patient Administration
70F-Health Services HR	70H-Health Svcs Plans, Ops, etc.	70K-Health Services Materiel
71A-Microbiology	71B-Biochemistry	71E-Clinical Laboratory
72A-Nuclear Medical Science	72B-Entomology	72C-Audiology
72D-Environmental Science	72E-Sanitary Engineer	73A-Social Work
73B-Clinical Psychology	75A-Field Veterinary Service	75B-Veterinary Preventive Med

National Security exemption will affect all warrant officer positions in the following skills:

640A-Veterinary Services Technician	670A-Health Services Maintenance Technician
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National Security exemption will affect all enlisted positions in the following skills:

91A-Medical Equip Repairer	91B-Medical Specialist	91C-Practical Nurse
91D-Operating Room Specialist	91E-Dental Specialist	91G-Patient Admin SP
91J-Medical Logistics SP	91K-Medial Lab Specialist	91M-Hospital Food Svc Spec
91P-Radiology Specialist	91Q-Pharmacy Specialist	91R-Vet Food Inspect Specialist
91S-Preventative Med Specialist	91T-Animal Care Specialist	91V-Respiratory Specialist
91W-Medical Specialist	91X-Mental Health Specialist	91Z-Sergeant Major (Chief Med NCO)

**Direct Patient Care Exemption From A-76**

Direct Patient Care exemption from A-76 will affect all military (to include officer and enlisted medical specialties not identified under the National Security Exemption) and GS-11 and higher civilian positions in the following occupational series assigned to all MEDCOM organizations shown on this sheet:

00600-00699-Physicians, nurses, allied health & health spt spec.	00101-Social Science Analyst	00101-Social Science Aid Tech
00180-Psychologist	00181- Psychology Aid & Tech	00185-Social Worker
00186-Social Svc Aid & Assist	00401-General Biology Scientist	00403-Microbiologist
00404-Biological Science Tech	00405-Pharmacologist	00410-Zoologist
00413-Physiologist	00414-Entomologist	00415-Toxicologist
00440-Geneticist	00487-Animal Scientist	00493-Home Economist
00701-Veterinarian	00704- Animal Health Tech	00858-Biomedical Engineer
01863-Food Inspection	01864-Public Health Quarantine Inspector	04010- Prescription Byeglass Maker
04805-Medical Equip Repairer	05031-Insect Production Worker	05048-Animal Caretaker

W03HAA-USA Ctr for Health Promotion and Preventative Medicine	W05JAA-USA Medical Materiel Agency
W07CAA-Tripler Army Medical Center	W07RAA-Great Plains Regional Medical Cmd
W07SAA-Southeast Regional Medical Cmd	W07TAA-North Atlantic Regional Med Cmd
W08QAA-European Regional medical Command	W08RAA-Northwest Regional Medical Command
W08SAA-Pacific Regional Medical Command	W0CCAA-USA Medical Materiel Ctr, Europe
W0REAA-USA Medical Dept Activity, Alaska	W0BPAA-USA Veterinary Activity, Europe
W0Q1AA-Madigan Army Medical Center	W0Q3AA-William Beaumont Army Med Center
W0XNAA-USA Med Dept Activity, Ft Huachuca	W1G3AA-USA Army Security Force, Ft Detrick
W1HHAA-Landstuhl Army Medical Center	W1HJAA-Heidelberg Army Medical Center
W1MLAA-USA Med Dept Act, Ft Leonard Wood	W2DHAA-Walter Reed Army Medical Center
W2DLAA-Armed Forces Institute of Pathology	W2DNAA-Brooke Army Medical Center
W2FLAA-USA Med Dept Act, Redstone Arsenal	W2H8AA-USA Med Dept Activity, West Point
W2K1AA-USA Med Dept Activity, Ft Bustis	W2L3AA-USA Med Dept Activity, Ft Benning
W2L6AA-USA Med Dept Activity, Ft Bragg	W2L8AA-USA Med Dept Activity, Ft Campbell
W2LAAA-USA Med Dept Activity, Ft Knox	W2LMAA-USA Med Dept Activity, Ft Lee
W2M5AA-USA Med Dept Activity, Ft Hood	W2MJAA-USA Med Dept Activity, Ft Jackson.
W2MQAA-USA Med Dept Activity, Ft Rucker	W2MSAA-USA Medical Dept Activity, Ft Stewart
W2NKAA-USA Medical Dept Activity, Ft Polk	W2NVAA-USA Medical Dept Activity, Ft Sill
W2P0AA-USA Medical Dept Activity, Ft Riley	W2P1AA-USA Medical Dept Activity, Ft Carson
W2P4AA-USA Med Dept Activity, Ft Leavenworth	W36LAA-USA Health Facility Planning Agency
W383AA-USA Med Dept Activity, Wuerzburg	W398AA-USA Med Info Systems Support Activity
W3FBAA-USA Medical Dept Activity, Japan	W3J1AA-USA Joint Health Services Agency
W3QMAA-Dwight D Eisenhower Army Med Ctr	W3U4AA- USA Veterinary Command
W3U5AA-USA Dental Command	W3VYAA-HQ, USA Medical Command
W3VZAA-USA Medical Dept Center & School	W3ZRAA-Great Plains Regional Dental Command
W3ZSAA-North Atlantic Regional Dental Cmd	W3ZTAA-Southeast Regional Dental Command
W3ZUAA-Western Regional Dental Command	W3ZVAA-Pacific Regional Dental Command
W3ZWAA-European Regional Dental Command	W40MAA-USA Health Care Acquisition Activity
W4FFAA-USAMedical Dept Activity, Ft Irwin	W4U2AA-USA Medical Dept Activity, Ft Drum

**RDT&E Exemption From A-76**

RDT&E exemption from A-76 will affect all military (to include officer and enlisted medical specialties not identified under the National Security Exemption) and GS-12 and higher civilian positions in the following occupational series assigned to MEDCOM organizations listed on this sheet:

00101-Social Science Analyst	00102-Social Science Aid /Tech	00180-Psychologist
00181-Psychology Aid/Tech	00185-Social Worker	00186-Social Services Aid/Assist
00401-General Biology Scientist	00403-Microbiologist	00404-Biological Science Tech
00405-Pharmacologist	00410-Zoologist	00413-Physiologist
00414-Entomologist	00415-Toxicologist	00440-Geneticist
00487-Animal Scientist	00493-Home Economist	00701-Veterinarian
00704-Animal Health Technician	00858-Biomedical Engineer	01863-Food Inspection
01864-Public Health Quarantine Inspector	04010-Prescription Eyeglass Maker	04805-Medical Equipment Repairer
05031-Insect Production Worker	05048-Animal Caretaker	00600-00699-Physicians, nurses, allied health & health support

W03JAA-USA Med Research & Materiel Cmd	W03KAA-Walter Reed Army Institute of Research
W03SAA-USA Institute of Surgical Research	W03WAA-USA Research Inst of Environ Med
W03YAA-USA Army Aeromedical Research Lab	W2DRAA-WRAIR Special Foreign Activity
W4D7AA- USA Med Research Inst of Chem Def	W4GPAA-USA Med Res Inst of Infectious Disease
W4PZAA-USA Med Research Acquisition Activity	W4QFAA-USA Med Materiel Dev Activity