



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

REPLY TO  
ATTENTION OF

May 19, 2000

Exemption Number 2000-0001

MEMORANDUM THRU DIRECTOR OF THE ARMY STAFF

FOR ACTING DEPUTY CHIEF OF STAFF FOR LOGISTICS

SUBJECT: Quality Assurance Specialist (Ammunition Surveillance) Exemption

Reference your memorandum, DALO-AMA, 14 January 2000, subject: Federal Activities Inventory Reform (FAIR) Act Database Correction or Revision for Quality Assurance Specialist (Ammunition Surveillance) (QASAS) Career Program.

I have determined that it would be inconsistent with the FAIR Act determinations previously made in the acquisition and other functional areas to classify the QASAS functions as inherently Governmental within the meaning of the Act. As described in your memorandum, the functions performed by QASAS personnel do not appear to entail the exercise of substantial discretion or value judgment in applying Government authority or making decisions for the Government.

However, I have determined that the QASAS function should be exempted from private sector performance under Office of Management and Budget (OMB) Circular A-76 Reason Code A (Defense Reform Initiative Directive (DRID) 20 Manpower Mix Criteria Code I, "Civilian National Security or Operational Risk"). OMB Reason Code A is defined by OMB as designed to permit the Agency Head to identify specific commercial activities that should not be subjected to privatization, outsourcing or competition for purposes of the FAIR Act. Since you are the senior military official with technical responsibility for the QASAS function, your analysis of the risks involved is entitled to great weight. As you have pointed out, QASAS personnel, in contrast to single-task contractors, can, as a part of their normal duties, be rapidly shifted to any worldwide site and immediately begin effectively performing a variety of ammunition support tasks vital to the readiness of the Army. Since World War II, they have deployed with our combat troops in most theaters of operations, and are currently in Bosnia and Kosovo.

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