MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Contractor Inventory Review and Certification Requirement

1. References:

   a. Title 10 United States Code Sections 2330a and 235.


   d. Memorandum, Deputy Assistant Secretary of the Army (Force Management, Manpower, Resources) (DASA(FMMR)), 10 February 2012, subject: Compliance with Contractor Inventory Policies

2. References 1a., 1b., and 1c. require a review of the contracted functions reported in the Army’s Contractor Manpower Reporting Application (CMRA) and the related projections in the Panel for Documentation of Contractors (PDC) database within 90 days of submission of the CMRA to Congress. The Army internal suspense for these reviews is 15 October 2012, so that a report can be sent to USD(AT&L)/USD(P&R) containing a certification by the Secretary of the Army that these required reviews have taken place with appropriate corrective action.

3. Accordingly, each Commander will—at the level of Army Command, Army Service Component Command, Direct Reporting Unit, and Headquarters, Department of the Army (HQDA) Principal—provide the following certification for their reviewed contracted functions:

   I certify that I have reviewed at least 50 percent of the contracted functions reported in the Army’s contractor inventory and taken appropriate corrective action regarding inherently governmental and unauthorized personal services functions. Additionally, sufficient actions have been taken to mitigate risk when contracting closely associated with inherently governmental functions.
The certification should be reflected in coordinated updates to the PDC database and accompanied by an explanation of the review process methodology, consistent with references and with Army Federal Acquisition Regulation Subpart 5107.5.

4. In addition to the video teleconference conducted with your resource managers and services portfolio managers by HQDA staff on 24 July 2012, technical guidance on updating the PDC database can be found in the 10 February 2012 DASA(FMMR) memorandum—reference 1d. Key adjustments to the PDC database include actions to conform to statutorily-directed reductions of inherently governmental functions, closely associated with inherently governmental functions, personal services functions, and contract augmentations. Additionally, the PDC projections need to reflect the reductions in contracted services to Fiscal Year 2010 levels, as stipulated in Fiscal Year 2012 National Defense Authorization Act, Section 808. Documentation of contracted functions on Tables of Distribution and Allowances and in the Structure and Manpower Allocation System will be informed by the PDC adjustments.

5. My points of contact for this action are Dr. John Anderson (703) 693-2119, john.c.anderson1.civ@mail.mil; Ms. Eileen Ginsburg (703) 693-2109, eileen.ginsburg.civ@mail.mil; and Mr. Paul Rupprecht (703) 693-2123, paul.s.rupprecht.civ@mail.mil.

Enclosure

GWENDOLYN R. DEFILIPPI
Deputy Assistant Secretary of the Army
(Force Management, Manpower and Resources)

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