DEPARTMENT OF THE AIR FORCE
WASHINGTON DC

OFFICE OF THE ASSISTANT SECRETARY

23 JUL 2001

MEMORANDUM FOR DISTRIBUTION

FROM: SAF/AQX
1060 Air Force Pentagon
Washington DC 20330-1060

SUBJECT: Air Force Advisory and Assistance Services (A&AS) Policy Letter

This policy memo supersedes all previous versions of Air Force A&AS policy, including the 19 Jul and 26 Aug 96 interim policy letters. The policy contained herein is designed to supplement A&AS policy contained in the Federal Acquisition Regulation (FAR), Defense Federal Acquisition Regulation Supplement (DFARS), Office of Management and Budget (OMB) Circular A-11, and Department of Defense Directive (DODD) 4205.2.

There are a number of changes in this policy document. However, the two most significant changes follow. First, we have adjusted the dollar threshold for which general officer or SES manager approval is required, reducing the dollar level from $250K to $50K in accordance with the DFAR Section 237.272(c) requirement. Second, the revised policy stresses the importance of having a Determination/Decision Document (DDD) that covers all/each task order on multiple task order contracts and of having the DDD approved by an individual responsible for workload decisions at the organization where the contractor support is performed.

We request that Air Force organizations below the MAJCOM level address any questions directly to their MAJCOM headquarters and that the MAJCOM headquarters act as intermediaries with SAF/AQX for policy implementation questions. MAJCOM Headquarters representatives with questions should contact Ms Susan Tindall, SAF/AQXD, at (703) 588-7121, DSN 425-7121; or Mr Bill Geiger, SAF/AQXD, at (703) 588-7122, DSN 425-7122.

BLAISE J. DURANTE
Air Force A&AS Director
Dep Asst Sec (Mgt Policy & Program Integration)
Assistant Secretary of the Air Force (Acquisition)

2 Atchs
1. Distribution List
2. A&AS Policy

Attachment 1

Distribution List

MAJCOMS

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DRUs

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SAF/AQCP
SAF/FMBI
AFMC/PK/PKPC
AFMC/DR/DROM
AFMC/FM/FMPA
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AEDC/PKM
AFFTC/PKC
AFRL/PK

Attachment 2

AIR FORCE
ADVISORY AND ASSISTANCE SERVICES (A&AS)
POLICY

A. SCOPE:

This policy applies to all Secretariat/Air Force Management Headquarters Activities, Major Commands (MAJCOMs), Direct Reporting Units (DRUs), and Field Operating Agencies (FOAs) that contract for A&AS to include System Engineering and Technical Assistance contracts. This policy also applies to Federally Funded Research and Development Centers (FFRDCs), with exceptions.

B. ADVISORY AND ASSISTANCE SERVICES (A&AS) [Definition]:

(See Appendix 1)

The definition of A&AS invariably raises many interpretation questions given the broad nature of work purchased on service contracts. We expect all A&AS contracting actions to follow our policy requirements, including A&AS-type work on contracts not formally identified/defined as A&AS (in the DD350 system). It is important to adequately define all A&AS contracting actions as such so that they may be reported in the President's Budget Exhibit #15 (PB-15) [see Section H.]

C. A&AS EXEMPTIONS:

(See Appendix 2)

D. ADVISORY AND ASSISTANCE SERVICES CATEGORIES:

The three categories of A&AS are as follows. Detailed definitions of each category may be found in Appendix 1.

1. Management and Professional Support Services
2. Studies, Analyses, and Evaluations
3. Engineering and Technical Services

E. POLICY:

It is Air Force policy that:

1. The acquisition of A&AS is a legitimate way to support AF missions and operations. Accordingly, A&AS may be used at all organizational levels to help managers achieve maximum effectiveness or economy to meet mission requirements.

2. A&AS may be used to:

a. Obtain specialized opinions or professional and technical advice or assistance not available within the DoD or another Government Agency.

b. Obtain outside points of view to enhance understanding or develop alternative positions and/or solutions to various issues or problem areas.

c. Obtain reviews, analyses, appraisals, or summaries of information on subjects of highly specialized areas of concern.

d. Improve program and/or project management of DoD systems or programs through advice, assistance or training to include program monitoring; resource management, planning, programming; and milestone and schedule tracking.

e. Support or improve the management and/or administration of DoD organizations.

f. Provide advice for the efficient and/or effective operation of fielded weapons, weapon support and communication systems, equipment, or components.

g. Assisting in the introduction and transfer of engineering and technical knowledge for fielded systems, equipment, and components; for example, contracted technical representatives providing information, instruction, or hands-on training associated with the operation of such systems.

Note: A&AS Resources may be used only when organic capability is not available and cannot be obtained in time to meet the needs of the requiring activity, or when it is not cost effective to establish an organic capability. IAW FAR 16.505, A&AS contracts (including all option periods) normally may not exceed 5 years.

3. A&AS shall not be:

a. Used to perform inherently governmental functions as described in OFPP Policy Letter 92-1 and FAR Subpart 7.5.

b. Used to bypass or undermine personnel ceilings, pay limitations, or competitive employment procedures.

c. Awarded on a preferential basis to former Government employees.

d. Used under any circumstances specifically to aid in influencing or enacting legislation.

e. Obtained through assistance instruments (such as grants, cooperative agreements, and "other transactions").

f. Used to obtain professional or technical advice that is readily available within the agency or another Federal agency.

F. PROCEDURES FOR USING A&AS:

The process for using A&AS typically starts when an organization determines it needs to perform a certain workload and they believe they do not have the requisite organic personnel available. When organizations do not typically/frequently use A&AS, or when there is no A&AS contracting infrastructure in place, they should contact their MAJCOM/FOA/DRU A&AS focal point and/or their services contracting organization for assistance to see if there is an existing contract vehicle they might use. Regardless of what contracting vehicles are utilized, the requiring activity needs to comply with AF A&AS policy by following the steps outlined below. These lead to the formal identification, validation, and approval of their request to use A&AS to meet their workload requirements.

A&AS should be procured through a separate contract dedicated solely to A&AS if possible. However, when A&AS is procured as part of a non-A&AS contract vehicle, it shall be a separate contract line item number and separately priced. This facilitates identification and compliance with A&AS policy and reporting obligations.

Every purchase request (PR) package for A&AS, including task orders, shall include the following information:

1. A description of the services being procured by A&AS category (Management & Professional Support Services; Studies, Analyses, and Evaluations; or Engineering & Technical Services as defined in Appendix 1).

2. The types of skills needed, typically by Civilian Occupational Series.

3. A statement of work describing in as clear and unambiguous terms as possible the work to be performed, the deliverable(s), and a specified period of performance.

4. Estimated cost and level of effort expressed in dollars and contract manpower equivalents (CMEs) [man-years] (per year and total including all option periods). The Servicing Manpower Office is responsible for computing CMEs.

5. Certification by the requiring activity that: 1) the A&AS effort will not circumvent personnel ceilings; and 2) The services have been reviewed for the most cost-effective or efficient means of accomplishment. If the services could be performed more cost effectively in-house, a statement citing actions being

taken to hire organic resources or an explanation of why contracting out is necessary should be included.

6. Procurement requests for studies must contain a statement that the Defense Technical Information Center (DTIC) and other applicable information sources have been queried and that no known existing scientific, technical, or management report could fulfill the requirement.

7. Surveillance plans specifying how contractor performance, performance standards, and deduction schedules, as required, shall be assessed. Note: Organizations are reminded they need to consider the applicable requirements for Performance-Based Service Contracting.

The Determination/Decision Document (DDD). We have developed the "Determination/ Decision Document (DDD)" as the overarching term and document that consolidates requirement numbers 1, 2, 4, and 5 above; in addition, the DDD formalizes the necessary administrative A&AS management reviews/approvals, and highlights compliance requirements that might not always be picked up in a PR package. The required DDD format is at Appendix 3. The DDD must conform to the approved DDD format and identify the requiring activity, a short description of the requirement, period of performance, number of A&AS man-years/dollars, and type of skills needed for each task order covered by the DDD.

NOTE: Every A&AS task order must have an approved DDD in the contract file. Where feasible, task orders may be grouped for expediency and approved with one DDD. For example, at the time of contract award, known requirements may be grouped and approved using one DDD.

Requirements that are not anticipated at the time of contract award must be handled in a separate DDD. However, follow-on requirements may also be grouped where feasible. Task orders should be grouped to maintain the intended integrity of the approval process. Therefore, task orders should be grouped and approved by an official who has responsibility for the work being performed (e.g., you should not have a General Officer/SES Manager in ESC approving work that will be performed in SMC). Once a DDD is accomplished for a task order, it is not necessary to re-accomplish the DDD for renewals of the task order unless the scope of the work is changed (work is added or deleted) subsequent to DDD approval.

In light of the significant DoD and AF senior leadership oversight driven by FFRDC review requirements outlined in FAR 35.017, the requirement to complete a DDD does not apply to support obtained from a FFRDC.

G. DELEGATION OF APPROVAL AUTHORITY:

This document serves as formal delegation of authority based on the dollar levels listed in Appendix 4.

H. REPORTING A&AS:

Each requiring activity is responsible for tracking and reporting A&AS usage in terms of obligations and contract manpower equivalents (CMEs). SAF/AQX releases a President's Budget Exhibit # 15 (PB-15) data call tasking letter in support of the annual budget cycle. PB-15 tasking letters typically provide additional instructions on A&AS reporting inclusions and exemptions. Each MAJCOM/FOA/DRU is responsible for reporting dollar/CME obligations and projections to SAF/AQX in the PB-15 exhibit.

A&AS (data) is identified and defined as Object Class 25.1 by Office of Management and Budget (OMB) Circular A-11. MAJCOMs/DRUs/FOAs should make sure to properly code their A&AS Non-FFRDC and FFRDC CMEs in their unit manning document (UMD) in the manpower data system (MDS). The servicing Manpower Office is responsible for updating the UMDs to reflect CMEs for A&AS/FFRDC contracts.

APPENDICES

Appendix 1: A&AS Definitions
Appendix 2: A&AS Exemptions
Appendix 3: Determination/Decision Document Requirements
- Section 1: A&AS Requirement Description
- Section 2: Availability of In-House Personnel
- Section 3: Cost Comparisons
- Section 4: Additional Certifications

Appendix 4: Delegation of Approval Authority and Dollar Thresholds

APPENDIX 1

A&AS DEFINITIONS

1. Advisory and Assistance Services (A&AS). Services acquired by contract from non-governmental sources to support or improve organization policy development, decision making, management and administration, support program and/or project management and administration; provide management and support services for research and development (R&D) activities; provide engineering and technical support services; or improve the effectiveness of management processes or procedures. Such services may take the form of information, advice, opinions, alternatives, analyses, evaluations, recommendations, training, and technical support. [Formerly referred to as Contracted Advisory and Assistance Services (CAAS).]

2. A&AS Contract Action. Any written action obligating or de-obligating funds for procuring advisory and assistance services to meet DoD requirements to include definitive contracts, letter contracts, purchase orders, job orders, task orders, other orders against existing contracts and contract modifications, change orders or agreements, supplemental agreements, option exercises and notices of termination or cancellation.

3. Contracted Services. Services that directly engage the time and effort of a contractor to perform an identifiable task rather than furnish an end item of supply. Includes separately identified services performed under a contract when the primary purpose is to provide supplies, equipment, or hardware.

4. Contract Manpower Equivalents (CMEs). A unit reflected in the Unit Manpower Document indicating the number of man-years of contractor effort. The servicing Manpower Office is responsible for calculating CMEs.

5. Determination/Decision Document (DDD). A document that summarizes the review and approval requirements prior to formally initiating an A&AS contract action.

6. Direct Reporting Unit (DRU). A subdivision of the Air Force directly subordinate to the Chief of Staff, US Air Force. A DRU performs a mission that does not fit into any of the MAJCOMs. A DRU has many of the same administrative and organizational responsibilities as a MAJCOM. [The Air Force Academy is one such example.]

7. Engineering and Technical Services. Services used to support the system program office or manager during the acquisition cycle by providing such services as systems engineering and technical assistance (FAR 9.505-1(B)) to ensure the effective operation and maintenance of a weapon system or major system as defined in OMB Circular A-109 or to provide direct support of a weapon system that is essential to R&D, production, or maintenance of the system. Includes information technology consulting services, such as information technology architecture design and capital programming, and investment control support services; and software services such as implementing a web-based, commercial off-the-shelf software product that is an integral part of a consulting services

contract. NOTE: As stated in our SAF/AQX Letter dated 6 Jan 2000, we are augmenting the "minimum" definition of A&AS set forth in the 1992 DoDD 4205.2 by retaining/including "System Program Office (SPO) Engineering" in our Air Force definition of A&AS.

8. Field Operating Agency (FOA). A subdivision of the Air Force directly subordinate to a Headquarters U.S. Air Force functional manager. The FOA performs specialized field activities beyond the scope of any MAJCOM. [The Air Force Cost Analysis Agency (AFCAA) is an example of a FOA.]

9. Functional Process Resource Owner. The organization charged with providing resources for a mission. [The AFMC Engineering Functional Home Office is required to provide System Program Offices with Engineering support; they would be the Functional Process Resource Owner. In most operational commands, the requiring activity would be the office responsible for requesting A&AS support.]

10. Inherently Governmental Functions. FAR Subpart 7.5 provides thorough description of the functions. Our summary follows: This is a function that is so intimately related to the public interest as to mandate performance by Government employees. These functions include those activities that require either the exercise of discretion in applying Government authority or the making of value judgments in making decisions for the Government. Governmental functions normally fall into two categories: (1) The act of governing, i.e., the discretionary exercise of Government authority, and (2) monetary transactions and entitlements. An inherently governmental function involves, among other things, the interpretation and execution of the laws of the United States so as to:

(a) Bind the United States to take or not to take some action by contract, policy, regulation, authorization, order or otherwise;

(b) Determine, protect, and advance its economic, political, territorial, property, or other interests by military or diplomatic action, civil or criminal judicial proceedings, contract management, or otherwise;

(c) Significantly affect the life, liberty, or property of private persons;

(d) Commission, appoint, direct, or control officers or employees of the United States; or

(e) Exert ultimate control over the acquisition, use, or disposition of the property, real or personal, tangible or intangible, of the United States, including the collection, control, or disbursement of appropriated and other Federal funds.

11. Organic or In-House Capability. Federal Government personnel within any military service or agency of the Department of Defense.

12. Initial Contract Award. Any new contract resulting from source selection or other negotiated acquisitions. Excludes modifications, definitizations, and exercise of options under existing contracts as well as one and two-step sealed bid and downselection portions of rolling downselection processes.

13. Initial Contract Award Proposal Evaluations and Analyses (ICAPEA). Updated FAR paragraphs 37.203 and 37.204 place special emphasis and requirements on querying the Federal Government for available personnel prior to using A&AS contractors for ICAPEA support.

14. Management and Professional Support Services. Services that provide assistance, advice, or training for the efficient and effective management and operation of organizations, activities (including management and professional support services for information technology and R&D activities) or systems. These services are normally closely related to the basic responsibilities and mission of the agency contracting for the services. Includes efforts that support or contribute to improved organization or program management, logistics management, project monitoring and reporting, data collection, budgeting, accounting, auditing, and administrative/ technical support for conferences and training programs. Also includes services to review and assess existing managerial policies and organizations; develop alternative procedures, organizations, and policies; and to examine alternative applications and adaptations of existing or developing technologies.

15. Requiring Activity/Organization. The organization which desires to use the A&AS services to assist in accomplishing its mission. (e.g. System Program Office desiring A&AS financial, engineering, or configuration support services). It is the requiring activity that is responsible for completing the DDD.

16. Studies, Analyses and Evaluations. Services that provide organized analytic assessments/evaluations in support of policy development, decision-making, management or administration. Includes studies in support of information technology and R&D activities. Also includes contractor support for models, methodologies, and related software supporting studies, analyses or evaluations. Examples include, but are not limited to: cost benefit or effectiveness analyses of concepts, plans, tactics, forces, systems, policies, personnel management methods and programs; studies specifying the application of information technology and other information resources to support mission and objectives; technology assessments and management and operations research studies in support of research, development, test, and evaluation (RDT&E) objectives; evaluation of foreign force and equipment capabilities, foreign threats, net assessments and geopolitical subjects; analyses of material, personnel, logistics and management systems; and environmental impact statements.

APPENDIX 2

A&AS EXEMPTIONS

The following services are exempt from the purview of this policy. Note: SPO Engineering is not exempt from A&AS requirements.

1. Activities that are reviewed and/or acquired in accordance with the OMB Circular A-76.

2. Architectural and engineering services for construction and construction management services procured in accordance with FAR Part 36.

3. Routine ADP and telecommunications services (such as standard maintenance or help desk services) unless they are an integral part of advisory and assistance services contracts; routine administrative services; printing services; and direct advertising (media services).

4. Basic operation and management contracts for Government-owned, contractor-operated facilities (GOCOs) (e.g., Arnold Engineering Development Center (AEDC)). Any contract action meeting the A&AS definition and procured under the GOCO basic contract, shall come under the purview of this Directive.

5. Clinical and medical services for direct healthcare.

6. Research on theoretical mathematics and basic medical, biological, physical, social, psychological, or other phenomena.

7. Training services acquired as an integral part of the procurement of weapon systems, automated, data processing systems, equipment or components, and training obtained for individual professional development.

8. Day-to-day operation of facilities and housekeeping services and functions.

9. Auctioneers, realty-brokers, appraisers, and surveyors

10. Services supporting the policy development, management, and administration of the Foreign Military Sales (FMS) Program that are not paid for with funds appropriated by the U.S. Congress.

11. Services procured with funds from the Defense Environmental Restoration Account (DERA).

APPENDIX 3

DETERMINATION/DECISION DOCUMENT (DDD) REQUIREMENTS

The paragraphs below outline the requirements of the different sections of the DDD. The DDD should be processed for approval in accordance with the delegation and approval levels outlined in Appendix 4.

Section 1: A&AS Requirement Description: **In this section include the following:**

I. A short description of the requirement
II. The number of A&AS in terms of Contract Manpower Equivalents (See Appendix 1: Definitions) and the anticipated dollar value of the contract/task orders by year and for the total contract.
III. Types of skills needed (e.g. grade, series, step level if organic resource would be used and anticipated title, level, experience required from an A&AS contractor)
IV. Period of Performance (Duration of Requirement including options)

Section 2: Availability of In-House Personnel: In this section the requiring organization must determine the availability of organic capability. **The requiring activity**, prepares the A&AS DDD and **shall determine whether queries shall be made at the individual task level or for an aggregation of individual task orders**, based on which is more reasonable for the acquisition. The requiring activity may choose to query for each task order or to query for several like task orders. Regardless of how query is accomplished, the requiring activity will perform a general search (which is less detailed than the query process for initial contract award proposal evaluations and analysis (ICAPEA)) to ensure that awarding the task order is cost effective and reasonable. In all cases this search for organic capability must be thoroughly documented.

For the purposes of this section it makes a difference how the A&AS resources are to be used. The search requirement for availability of organic capability prior to using A&AS in support of ICAPEA is more stringent than the search requirement for organic resources prior to using A&AS for non-ICAPEA support. Therefore, in this section, the requiring organization must determine if the A&AS requirement is for ICAPEA or other support services. If the work is in support of ICAPEA, then use paragraph (a) below; if the work is in support of other tasks, then use paragraph (b) below:

(a) Querying procedures for ICAPEA must be more detailed as directed in the Federal Acquisition Streamlining Act of 1994 (FASA), Section 23 and as implemented in the FAR sections 7.103(o) and 37.203/204/205 by FAC 90-33 dated 1 Oct 95. In order to comply with this legislation, a query must be conducted by the **requiring organization** (or the functional process resource

owner) to **ensure that personnel with adequate skills and capabilities are not readily available within DoD and associated organizations.** Therefore, the **requiring organization** (or functional process resource owner), after querying within the Air Force, **must contact at least one other Federal Agency outside of the Air Force**. (For this purpose, other military services/agencies are considered "Federal Agencies"). The requiring activity should contact another Federal Agency most likely to employ the skills necessary to support the required ICAPEA prior to releasing the Request For Proposal (RFP).

(b) Conduct a general query to ensure that personnel are not readily available within the requiring organization and the requiring organization's MAJCOM.

Section 3: Cost Comparison: This section **must be completed if in-house personnel are identified in Section 2 and the requirement is estimated to be equal to or over $100,000**. To perform the cost comparison:

(a) Estimate the cost of performing the requirement with contractor personnel based on the information provided in Section 1.

(b) Develop the government estimate using in-house composite rates for military and civilian employees. For organic resources, use the cost comparison tables in AFI 65-503, *Air Force Cost and Planning Factors*, Table 19-1 for military composite pay rate and Table 26-1 for civilian composite pay rate at: www.saffm.hq.af.mil. (Click on the "Publications" button in the lower left side of the screen, then click on AFI 65-503 on the lower right side of the screen, then scroll down to the appropriate table.) Thoroughly explain and justify your approach for estimating the cost of the contractor personnel. For the A&AS resources, use cost data from a similar, recent A&AS contract, since cost data for the draft request for proposal will probably not be available.

Section 4: Additional Certifications: **The following statements must be added to the DDD**. Approval of the DDD represents that these statements are true.

(a) This A&AS effort will not circumvent personnel ceilings.

(b) This A&AS effort will not replace displaced government personnel with A&AS contractors unless proven to be financially advantageous to the Federal Government.

(c) This A&AS effort will not be performing inherently governmental functions as defined in OFPP Policy Letter 92-1 and FAR Subpart 7.5.

APPENDIX 4

DELEGATION OF APPROVAL AUTHORITY AND DOLLAR THRESHOLDS

The following dollar thresholds should be used to select the appropriate approval authority. For new A&AS contracts, dollar thresholds should be chosen based on the estimated value of the total A&AS requirement. For example, where multiple task orders are aggregated, the total value of all aggregated task orders would determine the approval level. Task order approvals will be based on the estimated task order value. When determining thresholds prior to using A&AS contractors for ICAPEA, use the estimated dollar value of the A&AS contractor's services during the ICAPEA and not the estimated value of the weapon system contract or the total value of the A&AS contract or task order. This approving authority is responsible for signing the A&AS DDD, thereby approving and certifying all requirements, determinations, and decisions.

Office/Organization	Threshold Level
1. Requiring Organization	Less than $50,000
2A. For all organizations except Air Force Materiel Command (AFMC):	
Wing Commanders. (Unless the Wing Commander is an 0-6 not filling a GO authorization, then forward to the first SES or GO in the reporting chain) Wing/CC may delegate approval authority but not below the Senior Executive Service (SES) or General Officer rank.*	$50,000 to $49,999,999
2B. For AFMC:	
Center Commanders. Center Commanders may delegate downward, but not below the SES or GO rank.*	$50,000 to $49,999,999

* In addition to authorizing and requiring General Officers and SES Managers to approve the use of A&AS in contracts over $50,000, DFARS Subpart 237.272(c) also authorizes "an officer in O-6 grade filling a general officer level position" and "an officer in O-6 grade who has subordinate SES personnel" to approve such actions.

3. MAJCOM Two Letter that has been designated as MAJCOM/FOA/DRU A&AS Director (e.g. AFMC/DR, etc.)	$50,000,000 to $99,999,999
4. SAF/AQX (AF A&AS Director)	$100,000,000 or Greater