MEMORANDUM FOR ALMAJCOM/FOA/DRU (CONTRACTING)

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

SUBJECT: Tracking COVID-19 and CARES Act Related Actions

As the Government response to COVID-19 continues, I appreciate the efforts everyone has taken to implement the guidance we receive. Contracting remains positioned to ensure continuity of operations and to minimize any potential impact to contractors that may result from the current situation. To that end, it is imperative that we are able to track and provide data for COVID-19 related actions to decision makers DoD-wide in order to assess and rapidly respond to ongoing challenges. This policy memorandum is intended to be consistent with DPC implementation guidance for coding actions related to the COVID-19 response, to include Section 3610 of the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

COVID-19 REA and Claim Tracker. Contracting Officers must use the Request for Equitable Adjustment (REA) and Claim tracker for COVID-19 related REAs and claims. The REA tracker is intended to provide a “live” report; therefore, Contracting Officers shall input data upon receipt of a REA or claim and update the information as the action progresses.

UCA Reporting Tool. The UCA Reporting Tool now includes a field for actions that support the Defense Industrial Base. Contracting Officers should select “Yes” for UCA actions issued to accelerate contract awards in negotiation to increase cashflow. For other UCA actions related to the COVID-19 response, include “COVID-19” in the Program Field.

Contract Action Reports (CAR) in FPDS-NG. Contracting Officers must enter codes into FPDS-NG CAR fields as follows:

<table>
<thead>
<tr>
<th>Type of Action</th>
<th>Description of Requirement (Block 6M)</th>
<th>National Interest Action (Block 6R)</th>
<th>Contingency, Humanitarian, or Peacekeeping Operation (Block 6H)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Actions for goods or services to provide direct support to COVID-19 crisis</td>
<td>COVID-19</td>
<td>P20C (appears as COVID-19 2020)</td>
<td>Presidential issued emergency declaration, or major disaster declaration</td>
</tr>
<tr>
<td>Actions taken under authorities outlined in the Coronavirus Aid, Relief, and Economic Security (CARES) Act Section 3610 which authorizes reimbursement of paid leave to a contractor to keep its employees or subcontractors in a ready state</td>
<td>COVID-19 3610</td>
<td>P20C (Appears as COVID-19 2020)</td>
<td>Presidential issued emergency declaration, or major disaster declaration</td>
</tr>
</tbody>
</table>
### Table of Action

<table>
<thead>
<tr>
<th>Type of Action</th>
<th>Description of Requirement (Block 6M)</th>
<th>National Interest Action (Block 6R)</th>
<th>Contingency, Humanitarian, or Peacekeeping Operation (Block 6H)</th>
</tr>
</thead>
<tbody>
<tr>
<td>New actions or modifications executed solely for the purpose of increasing cash flow to the Defense Industrial Base (DIB) using emergency flexibilities (e.g., progress payment rates, relax UCA limitations) without impact to cost, schedule, or performance</td>
<td>COVID-19 DIB</td>
<td>P20C (Appears as COVID-19 2020)</td>
<td>Presidential issued emergency declaration, or major disaster declaration</td>
</tr>
</tbody>
</table>

If multiple conditions in table rows above apply, then Contracting Officers must list each code within respective block(s) in the CWS. Appendix A provides screenshots to assist Contracting Officers in correctly coding CARs.

**Contract Writing System (CWS).** Three appendices are provided with this memorandum to provide implementation COVID-19 coding instructions to Contracting Officers for CON-IT, ConWrite, and ACPS. Contracting Officers shall appropriately code all actions determined to be COVID-19 related, to include new awards and modifications to existing contracts. Contracting Officers should follow suggestions within DPC memorandum, “Implementation Guidance for Section 3610 of the Coronavirus Aid, Relief, and Economic Security Act”, dated 9 Apr 2020, to establish CLINs by contract type.

In addition to the traceability of COVID-19 actions and consistent with OMB guidance, Contracting Officers have broad discretion to exercise good business judgment in response to this national emergency using the available acquisition tools and flexibilities in law, regulation, and terms of the contract to ensure that, together we remain a healthy, resilient, and responsive total force. As a reminder, Contracting Officers have regulatory tools available as outlined in 30 Mar 20 memo, *Managing Defense Contracts Impacts of the Novel Coronavirus*, issued by the Office of the Under Secretary of Defense, Defense Pricing and Contracting. These tools include, but are not limited to, clauses that excuse performance delays, such as Federal Acquisition Regulation (FAR) 52.249-14, *Excusable Delays*, and changes clauses, such as FAR 52.243-1 through FAR 52.243-4, where Contracting Officers may direct changes to contract performance in response to COVID-19 impacts or in response to Class Deviation 2020-O0013, *Cares Act Section 3610 Implementation*.

This policy is in effect until rescinded and is not retroactive. Please direct any questions to Karen Stevens, SAF/AQCP, (571) 256-2382 or DSN 260-2382.

**CAMERON G. HOLT, Maj Gen, USAF**
Deputy Assistant Secretary (Contracting)
Assistant Secretary of the Air Force (Acquisition, Technology, & Logistics)

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Appendix A: FPDS-NG CAR Coding Implementation Instructions

The screenshot below shows how to code the National Interest Action (NIA) and Emergency Acquisition fields within FPDS-NG when conditions within the table in Contract Policy Memo (CPM) 20-C-03 apply.

The screenshot below shows the Description of Requirement field (Blk 6M). This example contains “3610”, which means it is a CARES contract action.

Note: Enter COVID-19 followed by description in plain English of what is being bought as prescribed in DFARS PGI 204.606(3)(xii)(I)
Appendix B: CON-IT COVID-19 Coding Implementation Instructions

For new contract actions and modifications, enter **COVID-19** – before entering additional, macro-level contract description:

When making a CLIN, enter **COVID-19** – before the requirement name in the CLIN Description:

This paragraph will have special characters replaced with their standardized equivalents.
Appendix C: ConWrite COVID-19 Coding Implementation Instructions

For new contract actions, enter **COVID-19** – before entering additional, macro-level contract description data in the Name of Program field:

When making a Buy Plan, enter the same text into the Buy Plan Description field:

When making a CLIN, enter **COVID-19** – before the CLIN noun in Section B:
When a Purchase Request has an Emergency and Special Programs (ESP) code of CI, enter it into Section G as follows:
Appendix D: ACPS COVID-19 Coding Implementation Instructions

For COVID-19/CARES contract actions, input the appropriate information under “Description of Requirement (for CAR)”; reference the table listed under “Contract Action Reports (CAR) in FPDS-NG”, herein. This information will be imported into the CAR upon creation.
For COVID-19/CARES contract actions, input “COVID-19” before entering additional contract description data in the front page notes:

COVID-19 - Remainder of contract description...
When making a CLIN, input "COVID-19" in the **Noun** field as follows:

<table>
<thead>
<tr>
<th>Stock# 1650013761088FW 0001</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Noun</strong></td>
</tr>
<tr>
<td>COVID-19 - Insert CLIN Noun</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>COVID-19 - Input CLIN Description</td>
</tr>
</tbody>
</table>

![Image of the CLIN form with highlighted fields showing the input for Noun and Description]
When a Purchase Request has an Emergency and Special Programs (ESP) code of C1, enter it in the “ESP” field marked with the red box: