



DEPARTMENT OF THE AIR FORCE
WASHINGTON DC

OFFICE OF THE ASSISTANT SECRETARY

Contract Policy Memo (CPM) 20-C-03

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:

Type of Action	Description of Requirement (Block 6M)	National Interest Action (Block 6R)	Contingency, Humanitarian, or Peacekeeping Operation (Block 6H)
Actions for goods or services to provide direct support to COVID-19 crisis	COVID-19	P20C (appears as COVID-19 2020)	Presidential issued emergency declaration, or major disaster declaration
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	COVID-19 3610	P20C (Appears as COVID-19 2020)	Presidential issued emergency declaration, or major disaster declaration

Type of Action	Description of Requirement (Block 6M)	National Interest Action (Block 6R)	Contingency, Humanitarian, or Peacekeeping Operation (Block 6H)
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	COVID-19 DIB	P20C (Appears as COVID-19 2020)	Presidential issued emergency declaration, or major disaster declaration

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)

Attachments

- Appendix A: FPDS-NG CAR Coding Implementation Instructions
- Appendix B: CON-IT COVID-19 Coding Implementation Instructions
- Appendix C: ConWrite COVID-19 Coding Implementation Instructions
- Appendix D: ACPS COVID-19 Coding Implementation Instructions

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 displays the 'Contract Data' section of the FPDS-NG system for a 'Limited Liability Corporation'. The form contains several fields with dropdown menus. Two fields are highlighted with red rectangular boxes: 'National Interest Action' and 'Emergency Acquisition'. The 'National Interest Action' field is set to 'COVID-19 2020'. The 'Emergency Acquisition' field is set to 'Presidential issued emergency declaration, or a major disaster declaration'. Other visible fields include 'Type of Contract' (Firm Fixed Price), 'Inherently Governmental Functions' (Select One), 'Multiyear Contract' (Select One), 'Major Program' (Select One), 'Cost Of Pricing Data' (Select One), 'Purchase Card Used As Payment Method' (No), 'Undefined Action' (No), 'Performance Based Service Acquisition' (Not Applicable), 'Contract Financing' (Not Applicable), 'Cost Accounting Standards Clause' (Select One), 'Consolidated Contract' (Not Consolidated), and 'Number Of Actions' (1).

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

The screenshot shows the 'Description of Requirement' field (Blk 6M) in the FPDS-NG system. The field is highlighted with a red rectangular box. The text entered in the field is 'COVID-19 3610 - Follow Rules for rest of this field IAW existing policy'. Above this field are three dropdown menus: 'Sea Transportation' (Select One), 'GFP Provided Under This Action' (Select One), and 'Use Of EPA Designated Products' (Select One). Below the highlighted field is the 'Competition Information' section, which includes the 'Extent Competed For Referenced IDV' field.

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:

Description *

COVID-19 Cleaning Services

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

CLIN *

0001

Description *

COVID-19 Cleaning Services

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:

The screenshot shows the 'New Action' dialog box. The 'Options' section is expanded, showing radio buttons for 'Government' and 'Commerical' (sic) categories. Under 'Government', the 'Contract' option is selected. Under 'Commerical', the 'Commercial Contract' option is selected. To the right, there is a 'PIIN SPIIN (contract number)' field with 'FA8684' and '20 C 0001' entered, and a 'Next Available' button. Below that is a 'Buy Plan' field with a 'Find' button. At the bottom, there are tabs for 'Solicitation', 'Contracts', 'Mods', 'Delivery Orders', 'Assist Instr.', and 'Misc.'. The 'Name of Program' field is highlighted with a red box and contains the text 'COVID-19 - Requirement Name'. The dialog box has a back arrow and an 'Ok' button at the bottom.

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

The screenshot shows the 'Buy Plan Info for Contract FA8684-20-C-0001' dialog box. The 'Buy Plan Number' is 'FA8684-20-C-0001'. The 'Estimated Obligation Amount' is '\$ 0.00' and the 'Face Value' is '\$0.00'. The 'Build Milestone Schedule based on' section has 'Start Date' selected with '14 Apr 2020'. The 'Schedule' section has 'Buy Plan' selected. The 'Contract Actions Attached to Buy Plan' field contains 'none'. The 'Buy Plan Description' field is highlighted with a red box and contains the text 'COVID-19 - Requirement Name'. The dialog box has a back arrow and an 'Ok' button at the bottom.

When making a CLIN, enter **COVID-19** – before the CLIN noun in Section B:

Editing CLIN 0002

File Edit Tools Help

CLINs

New CLIN

0001
0001AA
0001AB
0001AC
0001AD
0001AE
0001AF
0001AG
0001AH
0001AJ
0001AK
0001AL
0001AM
0001AN
0002

CLIN: 0002 ACRN: Qty: 1 Unit: LO Unit Price: \$0.00 Total Amount: \$0.00

Standard Exhibit Quantity Variation: (over) (under)

Option CLIN Item Project Manager: DD1423 Applies
 Reserved CLIN First Article

Noun: COVID-19 - REQUIREMENT NAME

PSC: NSN: N - Not Applicable FSCM: Part Number:

Data Description

Curr: Service ID: Inspection Site: D - Destination
SERD: Acceptance Site: D - Destination
Contract Type: J - FFP FOB: D - Destination

Section B Section F Section G

Close

When a Purchase Request has an Emergency and Special Programs (ESP) code of *CI*, enter it into Section G as follows:

Editing CLIN 0003

File Edit Tools Help

CLINs

New CLIN

0001AA
0002
0003

ACRN: COVID-19 CLIN TITLE Appropriation: 57 03400 Limit SubHead (rarely used): Fund Format: AF

AC Select ACRN Unfunded

Supplemental Accounting Classification:
000 0000 000000 000000 00000 000000 000000

ADSN: 000000 CPN: AAAAAA JON: WBS: ESP: CI

B.C. ACRN

Override LongLine: 57 03400 000 0000 000000 000000 000000 000000 AAAAAA 000000

PR/MIPR:

Purchase Requests	Amount

Obligation Amount:
CLIN 0003 Change: \$0.00
ACRN AC Change: \$0.00

Non-CLIN Payments:
J - Value Engineering
K - Termination charges
L - Escalation clause
M - Price redetermination
P - Set-up charge
T - Transportation charges
Z - Other lump-sum settlements fr
None

Data Description Analysis of Changes

Section B Section F Section G

Close

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.

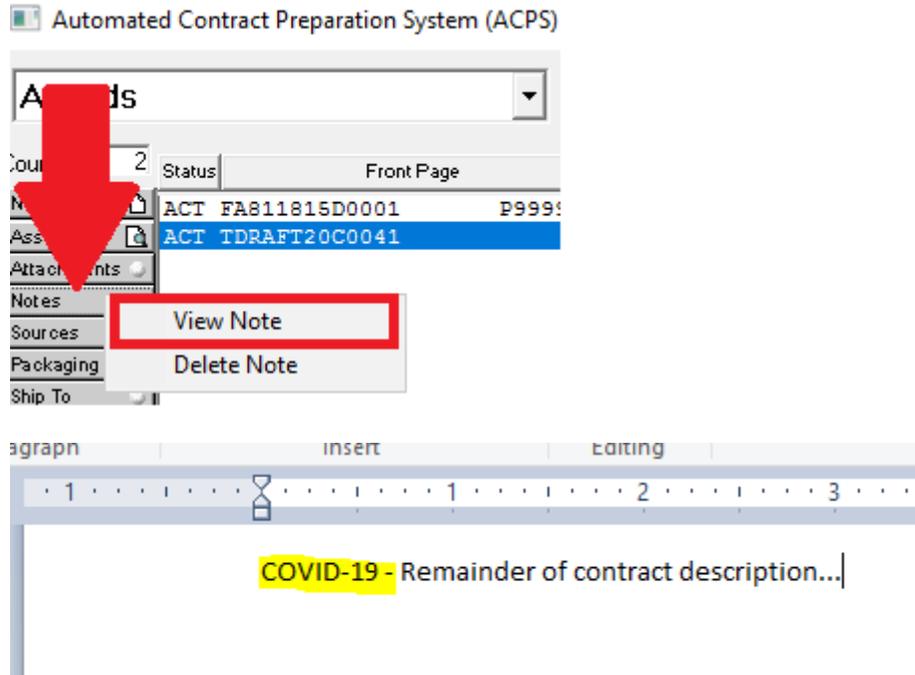
Award - TDRAFT20C0041

Total \$00	Priority R	DO AT B	SCD B	EXCP
Office Symbol AFSC/PKXY	Issuing Office TDRAFT	NAICS 336412	Size 1,500	
Buyer Michelle Syth	CO	FOB Requirements Origin Destination Other	Electronic Invoice Yes	FMS Requirements N
<input type="checkbox"/> Don't Print Email Address	Warrant Amt. \$0	PR No.	Sol No.	
<input type="checkbox"/> Issued Pursuant to the Small Business Competitiveness Demonstration Program	Contractor is not required to sign and return 0 copies	Description of Requirement (for CAR) Limit 250 characters		
Print PIIN Yes No	<input type="checkbox"/> Surge Indicator	View Document Dates		

Awardee Info... Doc Detail OK Cancel

Input COVID-19 or COVID-19 3610 or DIB as appropriate - Follow Rules for rest of Description of Requirement IAW existing policy

For COVID-19/CARES contract actions, input “**COVID-19**” *before* entering additional contract description data in the front page notes:



When making a CLIN, input “COVID-19” in the **Noun** field as follows:

The screenshot shows a software interface with a table of 'LINE ITEMS' at the top. The table has columns for 'Type LI', 'SVC/FSC', 'PA', 'Delivery', 'Funds', 'QA/Insp.', 'Ship To', 'Transport', and 'Pkg'. A red arrow points to the 'SVC/FSC' column. Below the table, there is a form for 'Stock# 1650013761088FW 0001'. The 'Noun' field is highlighted with a red box and contains the text 'COVID-19 - Insert CLIN Noun'. Other fields include 'Description', 'MDAP/MAIS Codes (System Equipment Code)', and various checkboxes for 'Qualification Reqmts...', 'Required Sources...', 'Environment/Safety...', 'Surge Indicator', 'Critical Safety Items...', 'Next Higher Assembly ...', 'Physical Item Markings...', and 'Foreign Restrictions...'. There are also input fields for 'ERRC', 'AMC', and 'AMOC'.

The screenshot shows the same software interface as above. The 'Noun' field now contains 'CLIN Noun'. The 'Description' field is highlighted with a red box and contains the text 'COVID-19 - Input CLIN Description'. The rest of the form, including the 'MDAP/MAIS Codes' and various checkboxes, remains the same as in the previous screenshot.

When a Purchase Request has an Emergency and Special Programs (ESP) code of *CI*, enter it in the “ESP” field marked with the red box:

Funds - Air Force Long Line of Accounting FA850518F0021 ACRN: AA

Fund Code: 11

Funding Type Description: Procurement, Mission Pgm Funds

USD: 0.00

Appropriation: DoD: 57, Y: 8, Sym: 3010, Limit: , FC: 11, Y: 2018

OAC: LC, ASN: RN, BPAC: 11328A, MPC: 4E914A, EEIC: 80901, PEC: 27130F, ASDN: 503000, DODAAC: F03000

ESP: (highlighted with a red box)

Job Order No.: , CSR: 880100, PSR: 444443, FSR: 051692, DSR: 039742

Reference, OK, Cancel