



Department of Defense Education Activity

DODEA PROCEDURAL GUIDE

NUMBER: 15-PGLOG-001

DATE: December 8, 2015

LOGISTICS DIVISION

SUBJECT: Baseline Requirements for the Management and Control of Government Owned or Furnished Property in the Possession of Contractors

- References:**
- (a) Title 48, CFR, Chapter 1, Subchapter G, Part 45, "Government Property," (2013)
 - (b) DoD Instruction 5000.64 "Accountability and Management of DoD Equipment and Other Accountable Property," May 19, 2011
 - (c) DoDEA 4100.2-M "Department of Defense Education Activity Material Management Manual," November 28, 2005
 - (d) Title 48, CFR, Chapter 2, Subchapter H, Part 252, Paragraph 252.211-7007 (2013)
 - (e) USD (ATL) Memorandum, "Standard Equipment Data Elements for Government Furnished Property Baseline Establishment," January 7, 2012

1. PURPOSE. To provide guidance for the process of establishing a baseline of government furnished equipment (GFE) for both new and existing contracts and outline the processes of maintaining accountability of GFE throughout the Department of Defense Education Activity.

2. APPLICABILITY. This Procedural Guide applies to the Office of the Director, DoDEA; the Director, Domestic Dependent Elementary and Secondary Schools, and Department of Defense Dependents Schools, Cuba (DDESS/DoDDS-Cuba); the Director, Department of Defense Dependents Schools, Europe (DoDDS-E); the Director, Department of Defense Dependents Schools, Pacific, and Domestic Dependent Elementary and Secondary Schools, Guam (DoDDS-P/DDESS-Guam), (hereafter collectively referred to as "DoDEA Area Directors"); and all DoDEA Area and District Superintendents, School Administrators.

3. DEFINITIONS. See Glossary for a list of acronyms, abbreviations, and definitions.

4. POLICY. It is DoDEA policy that all government furnished property (GFP) in the possession of contractors be monitored and controlled for audit readiness and to ensure standardized Department of Defense (DoD) baseline requirements are met. This policy also

applies to property that is loaned or otherwise provided to outside entities, such as other federal agencies or state, local, or foreign governments. DoDEA Area Directors, District Superintendents, and School Administrators shall ensure activities under their purview comply with GFP baseline requirements as established in Reference (a) and by this procedural guide and institute procedures to meet these requirements.

5. RESPONSIBILITIES. See Enclosure 1.

6. PROCEDURES. See Enclosure 2.

7. EFFECTIVE DATE. This Procedural Guide is effective immediately. Formal baseline management of GFE within DoDEA will commence immediately thereafter. The Defense Property Accountability System (DPAS) is the mandated automated property management system DoDEA shall use to maintain automated GFE records.



Robert M. Brady
Associate Director for Financial
and Business Operations

Enclosure

1. Responsibilities
 2. Procedures
- Glossary

TABLE OF CONTENTS

RESPONSIBILITIES4

PROCEDURES.....6

GLOSSARY7

 ABBREVIATIONS AND ACRONYMS7

 DEFINITIONS.....7

ENCLOSURE 1

RESPONSIBILITIES

1. CONTRACTING OFFICER (CO). The CO shall:

a. Advise contractors of their responsibilities regarding the management of GFP, in accordance with References (a) Title 48, CFR, Chapter 1, Subchapter G, Part 45, "Government Property," (2013) and (b) "DoD Instruction 5000.64 "Accountability and Management of DoD Equipment and Other Accountable Property," May 19, 2011.

b. Refer to References (a), (b), and (c) for guidance on the liability for lost or damaged government property in the possession of contractors.

c. Formally notify the Accountable Property Officer (APO) in their area of all contract awards that include GFP.

2. CONTRACTING OFFICER REPRESENTATIVE (COR). The COR shall:

a. Ensure the contractors are in compliance with the property provisions in the contract in accordance with References (a) and (b).

b. Contact the APO on all matters related to the management and control of GFE in accordance with References (a) and (c).

c. Maintain a signed copy of the GFE inventory records for assets in the possession of the contractor.

3. MAJOR CUSTODIANS (MC). The MC shall:

a. Monitor and maintain inventory records for all GFE assigned.

b. Provide assistance to the APO or their staff when the annual GFE inventory is being conducted.

c. Ensure property records are updated when GFE assets assigned to their MC account are relocated.

d. Notify the APO and COR upon the discovery of any GFE assets assigned to their MC account that are lost or damaged.

e. Initiate the procedures for the liability of lost or damaged government property in accordance with references (a), (b), and (c).

4. CONTRACTOR. The Contractor shall, in accordance with the terms of the contract:

a. Notify the MC upon the discovery of any GFE assets in their possession that are lost or damaged.

b. Notify the MC when any GFE assets are relocated to a new location.

5. ACCOUNTABLE PROPERTY OFFICER (APO). The APO shall:

a. Maintain property accountability of GFE assets in DPAS, to include a complete audit trail of transactions, suitable for audit in accordance with Reference (c).

b. Ensure assets identified as GFE in DPAS reflect the following loan codes:

(1) Loan code of "C" to indicate the assets are furnished to the contractor;

(2) Loan code of "M" for property on loan to government activities, or

(3) Loan code of "N" for non-government activities in possession of GFE.

c. Ensure GFE assets are inventoried annually by September 30. The inventory will be performed utilizing Automated Information Technology.

d. Ensure GFE in the possession of a contractor is reported and tracked electronically through the unique identification (UID) registry. The same basic rules that determine whether an asset will be a UID item also apply to GFE assets, in accordance with Reference (d) "Title 48, CFR, Chapter 2, Subchapter H, Part 252, Paragraph 252.211-7007" (2013).

e. Ensure procedures are followed for the liability of lost or damaged government property, in accordance with References (a), (b), and (c).

ENCLOSURE 2

PROCEDURES

1. BACKGROUND. Due to Department of Defense (DoD) policy updates enhancing oversight and accountability requirements of agencies to properly document and account for assets, particularly GFE, DoD agencies have been challenged with bringing their processes and records into compliance.

2. INTENT. DoDEA must maintain documentation of property provided to contractors, in accordance with Reference (c). Without proper documentation and accountability, legal complications can arise, such as title or ownership issues, abandonment, storage costs, and disposal concerns. Lack of accountability and insufficient documentation for GFE assets impacts the agency's ability to achieve audit readiness. Management and control of GFE will be exercised consistent with the responsibilities set forth in Enclosure 1.

3. POINT OF CONTACT. The provisions of this policy will be included in the next revision of Reference (a). Questions concerning this procedural guide and the policies established by Reference (a) should be addressed to Chief, Logistics Division at (571) 372-1411.

GLOSSARY

PART I. ABBREVIATIONS AND ACRONYMS

APO	Accountable Property Officer
CO	Contracting Officer
DoD	Department of Defense
DoDEA	Department of Defense Education Activity
DPAS	Defense Property Accountability System
MC	Major Custodian
UID	Unique identification

PART II. DEFINITIONS

GFE. GFE is equipment, special tooling, or special test equipment provided to a contractor for use on a government contract, in accordance with reference (b).

GFM. GFM is material that is sometimes provided to contractors (e.g. pencils, trash cans, paper, pens, tape, screws and other consumable items) for use on a government contract. Unlike GFE, GFM is included in the cost of the contract's life cycle; there is no requirement to maintain accountability of GFM.

GFP. In accordance with references (b) and (d), GFP is property furnished to a contractor for the performance of a government contract. There are two types of GFP: equipment (GFE) and material (GFM).