



COMDTINST 4200.38B
NOV 19 1998

COMMANDANT INSTRUCTION 4200.38B

Subj: COAST GUARD STANDARDIZATION PROGRAM

1. PURPOSE. This directive establishes the Coast Guard Standardization Program and discusses ways to achieve standardization using competitive contracting procedures. The directive also sets forth procedures for processing and approval of Head of the Agency, as delegated to the Head of the Contracting Activity (HCA) (TAM1206.302-1), determinations and Justifications for Other Than Full and Open Competition (JOTFOCs) when only specified makes and models will meet the Coast Guard minimum needs. Intended users are all contracting and program personnel.
2. ACTION. Area and district commanders, commanders of maintenance and logistics commands, assistant commandants for directorates, commanding officers of headquarters units, Chief Counsel and special staff offices at Headquarters shall ensure compliance with the provisions of this instruction.
3. DIRECTIVES AFFECTED. COMDTINST 4200.38A is canceled.
4. DISCUSSION. In order to carry out assigned missions successfully, the Coast Guard needs to maintain a high state of readiness throughout its cutters, aircraft, and other assets. Standardization usually but not always supports this need by providing for lower life-cycle costs associated with maintenance, repair, and operation of resources. Increased populations of standardized items promote economies of scale and increased supportability over the item's service life. The Coast Guard Standardization Program defines the standardization process.
 - a. Acquisition Considerations.

- (1) Equipment to become standard shall be chosen from items already supported in government inventory and systems under production, on a scale representative of the population to be standardized, whenever such items will fulfill Coast Guard requirements.
 - (2) Where equipment or systems already in Government inventory will not satisfy new requirements, procurement of equipment and systems to satisfy these requirements shall be open to competition to the maximum extent practicable.
 - (3) The initial procurement shall be supported by the JOTFOC required by the Federal Acquisition Regulation (FAR) 6.302-1 when the selection of an item or system to become standard is not the result of full and open competition. In this situation, the Standardization Program can't be used as the basis for the source selection. To use the Standardization Program as the basis for the source selection, the item or system must be the result of full and open competition resulting in quantities that are representative of the population to be standardized.
 - (4) Follow-on procurements of items or systems determined by the HCA to be Coast Guard standard items in accordance with this Instruction shall be supported by the JOTFOC required by FAR 6.302-1, citing the HCA's Determination, as described below, as the basis for the justification.
 - (5) Solicitations for Major Acquisitions shall include an optional line item for reprourement data packages for all equipment, which is unique to Coast Guard. Reprourement data packages are to include production and testing methods in addition to detailed specifications. The decision to exercise the option for reprourement data shall be based on a fully supportable economic analysis. The analysis shall include, but not be limited to, the life expectancy of the equipment and anticipated future replacement quantity demands. Documentation in support of a decision not to buy reprourement data shall be submitted to the Senior Competition Advocate, Commandant (G-CFP), allowing time for review prior to expiration of the option period.
- b. Standardization Process.
- (1) The cognizant program office shall make a preliminary, informal proposal (either written or oral) to the Competition Advocate Assistant, Commandant (G-CPM-S/3). This proposal shall provide general information regarding the scope, number of units, total estimated dollar value, and the service life of the proposed equipment or system. The Competition Advocate Assistant will then decide if the Coast Guard Standardization Program applies, and, if so, will advise the program office as to how to proceed.

- (2) If, as a result of b. (1), above, standardization is indicated, the HCA's determination (enclosure 1), required by FAR 6.302-1 (b)(4), shall be prepared by the Cognizant Program Office in conjunction with the Office of Procurement Management, Commandant (G-CPM). The findings upon which the determination is based shall be included in the document and shall address the cost-savings-factors listed in paragraph 3.c, below. The cognizant program office shall provide all pertinent technical and cost data including cost savings, displayed in supportable dollar figures. Prior to submitting the D&F for approval, it may be necessary for the cognizant program office to have it reviewed by Commandant (G-CPA) for resource impact and validation of assumptions used in estimating savings. A separate determination shall be written for each specified piece of equipment as a class determination to be used to support all procurements for the specified equipment during the effective period of the determination. Procurement of equipment for which a determination was made prior to this instruction and for which the effective period has not expired will not require a new determination.
- c. Areas of Consideration for Potential Cost Savings Resulting From Standardization.
- (1) Design Costs.
 - (2) Provisioning Costs.
 - (3) Training Costs.
 - (4) Inventory Costs.
 - (5) Repair Facility Costs.
 - (6) Administration and Management Support Costs.
- d. Standardization Review Board. The chairman shall convene an Ad Hoc board to resolve issues of unusual complexity. The Chairman of the Review Board is the Coast Guard Senior Competition Advocate. The Board will be comprised of one representative from the Competition Advocate Staff, one representative from Commandant (G-ACS), one legal representative, Commandant (G-LPL), and one representative from the cognizant program office. The Board may meet to review existing standardized items to ensure that the original economic analyses are still valid and continue the standardization or open it to full and open competition.

/s/ W. H. CAMPBELL
Director of Finance and Procurement

Encl: (1) Determination and Findings

Enclosure (1) to COMDTINST 4200.38B

The following format and minimum information shall be included in each D&F submitted.

U. S. COAST GUARD

Contracting Activity:

DETERMINATION AND FINDINGS FINDINGS

1. Include the nature and description of the action being taken. Provide statements of fact or rationale to support the determination to be made.
2. Provide the statute or regulation applicable to the requirement and on which this D&F is based.
3. The findings shall contain sufficient facts or rationale to convincingly justify the determination. In addition, it should include estimated quantities and any options. Obtain supporting documentation from appropriate requirements, technical, and contracting personnel.
4. Consider the following costs in support of this action. Explain and include supportable estimated savings and cost avoidance for each cost.
 - a. Design cost.
 - b. Inventory cost.
 - c. Provisioning cost.
 - d. Training cost.
 - e. Repair facility cost.
 - f. Administration and management support cost.
 - g. Any other cost where savings or avoidance can be achieved.

DETERMINATION

Make a determination based on the findings that is justified under the applicable statute or regulation.

EXPIRATION DATE:

CERTIFICATION:

I certify that the supporting data that is the responsibility of the requirements and technical personnel and which forms the basis for all the claims and estimates in this D&F is accurate and complete to the best of my knowledge and belief. I recommend approval of the above determination.

Date

Project Manager

In accordance with 10 USC 2304c as implemented by FAR 6.302-1 (b)(4), the above determination is hereby approved.

Date

Head of Contracting Activity