



DEPARTMENT OF THE ARMY  
UNITED STATES ARMY INSTALLATION MANAGEMENT COMMAND  
EUROPE REGION  
UNIT 29353, BOX 200  
APO AE 09014-0200

IMEU-HRL

6 September 2011

MEMORANDUM FOR IMCOM-Europe Staff Principals, HNLFOA Director, and USAG  
Commanders

SUBJECT: IMCOM-Europe Guidance on Local National Position Designations

This memorandum expires in 1 year.

1. References:

a. United States Code, Title 10, section 129a, General Personnel Policy.

b. DOD Instruction 1400.25, DOD Civilian Personnel Management System, volume 1231,  
Employment of Foreign Nationals.

2. IMCOM-Europe staff principals, the HNLFOA Director, and USAG commanders will apply the enclosed criteria to all U.S. positions on their table of distribution and allowances, regardless of the position's function, grade, or organizational placement, to determine the benefit and feasibility of converting them to local national (LN) positions.

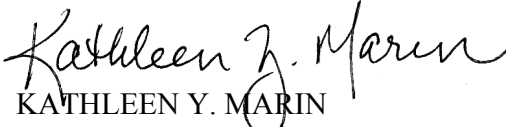
3. Proper position designation ensures compliance with statute (ref 1a) and DOD policy (ref 1b). It also reduces payroll costs and supports my objective of increasing the number of mid-level LN positions. Additionally, increasing the number of LN employees helps retain highly skilled and experienced employees during periods of base closures. On a related note, the use of temporary and term LN employees should be considered when backfilling positions in nonenduring organizations.

4. For Family and morale, welfare, and recreation (FMWR) managers, LN position designation requires a delicate balance between program requirements and the requirements in paragraphs 2 and 3. FMWR professionals must develop, implement, and deliver FMWR programs and activities that are representative of similar operations in the continental United States. To achieve this objective, mid- and senior-level FMWR professionals must have program-specific training and experience to sustain the quality and scope of FMWR initiatives in Europe.

5. If qualified LN candidates are not available to fill vacant LN positions, U.S. citizens may fill the positions. In these cases, Family members must be given highest priority consideration. When a U.S. citizen fills an LN position, the position must remain documented as an LN position on the TDA and be recruited as LN when it becomes vacant again.

6. The POC is Mrs. Staley, DSN 370-6523 or e-mail: heidi.m.staley@eur.army.mil.

Encl

  
KATHLEEN Y. MARIN  
Acting Director

*This memorandum is available at <https://aepubs.army.mil>.*

## **GUIDELINES FOR POSITION DESIGNATION**

### 1. References:

- a. AR 380-67 and USAREUR Supplement 1, Personnel Security Program.
- b. AR 570-4, Manpower Management.

### 2. The following are the criteria applicable in IMCOM-Europe for designating positions on tables of distribution and allowances (TDAs):

#### a. Military occupancy will be designated only for TDA positions that require any of the following:

- (1) A military incumbent for reasons of combat readiness, discipline, law, rotation, security, or training.
- (2) A military background to perform the duties involved.
- (3) Unusual hours not normally associated or compatible with civilian employment.

#### b. For all other positions, civilian manpower will be used. Local national (LN) personnel will be used to fill civilian positions unless one of the following applies:

- (1) The position is engaged in policy-making or supervisory functions that involve significant U.S. national economic, financial, military, or political interests.
- (2) The position regularly requires access to defense information not released to foreign nationals. Managers must validate the need for a U.S. security clearance and consider the possibility of granting LN personnel limited access to U.S. classified information (ref 1a). If the requirement for a security clearance was determined at a higher level, the position will remain a U.S. position.
- (3) The position requires qualifications or credentials not found among LN personnel.
- (4) The position is an Army Career Program position and the head of the organization, in coordination with the appropriate career program manager, has determined that continuation of the position as U.S. is proper and justified. Organization heads will ensure a sound LN and U.S. position mix in these position categories, while ensuring employees have sufficient career-development and progression opportunities outside the continental United States for U.S. careerists. Because of the unique requirements of FMWR programs, concurrence on position designation for all key FMWR program positions must be obtained from the IMCOM-Europe Career Program Manager for Career Program 51.
- (5) Law or regulation requires that the position remains a U.S. position.

### 3. When initiating personnel actions, organization heads must ensure their position-designation decisions are properly noted in the Gatekeeper Program.

Encl