



COMDTINST 4081.19

MAR 25 2011

COMMANDANT INSTRUCTION 4081.19

Subj: COAST GUARD INDEPENDENT LOGISTICS ASSESSMENT (ILA)

- Ref: (a) Major Systems Acquisition Manual (MSAM), COMDTINST M5000.10 (series)
 (b) Non-Major Acquisition Process (NMAP), COMDTINST 5000.11 (series)
 (c) System Integrated Logistics Support Command (SILS) Policy Manual, COMDTINST M4105.8 (series)
 (d) Department of Homeland Security (DHS) Acquisition Directive 102-01 (series)

1. PURPOSE. This Instruction provides Coast Guard (CG) policy on independent logistics assessments (ILAs). An ILA is a formal review of a system's (e.g., aircraft, vessel or electronic equipment) acquisition logistics planning and documentation. This Instruction describes the purpose of an ILA, the decisions an ILA supports, when to conduct an ILA, what an ILA must check, and ILA related responsibilities.
2. ACTION. All Coast Guard unit commanders, commanding officers, officers-in-charge, deputy/assistant commandants, and chiefs of headquarters staff elements shall comply with the provisions of this Instruction. Internet release is authorized.
3. DIRECTIVES AFFECTED. None.
4. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATION. Environmental considerations under the National Environmental Policy Act (NEPA) were examined in the development of this Instruction. This Instruction includes preparation of guidance documents that implement, without substantive change, the applicable Commandant Instruction or other Federal agency regulations, procedures, manuals, and other guidance documents. It is categorically excluded from further NEPA analysis and documentation requirements under Categorical Exclusion (33) as published in COMDTINST M16475.1D, Figure 2-1. An Environmental Checklist and Categorical Exclusion Determination (CED) are not required.

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5. **BACKGROUND.** All major system and non-major system acquisition projects must prepare numerous logistics-related plans and resource documents during an acquisition. The CG uses ILAs to review those logistics plans and resource documents, and the policies and processes used to produce them. The purpose of performing an ILA is to identify acquisition logistics risks that the CG can mitigate through prompt corrective action. The ILA process further checks acquisition plans and resource documents to ensure they will provide the required logistics support, assesses policies and processes to ensure they will consistently produce high-quality logistics plans, and initiates corrective action to address deficiencies in acquisition logistics. The results of the ILA are a means for decision makers to evaluate risks effectively, life-cycle costs, supportability, and systems' sustainment. The acquisition project manager normally provides funding for an ILA.

The CG uses ILAs to check logistics planning and identify supportability issues during the acquisition stage of a system's life cycle. Figure 1 displays the three stages of the CG system's life cycle.



Figure 1: Three Stages of the Coast Guard System's Life Cycle

Proper logistics planning during a system's acquisition stage is important because plans created during that stage impact the system throughout its life cycle. Decisions made in acquisition logistics planning are ultimately responsible for most of the costs incurred for sustainment and disposal. Typically, the CG incurs up to 70 percent of a system's costs during the operations & sustainment, and disposal stages of the system's life cycle.

6. **POLICY.**
 - a. **ILA Purpose.** All major and non-major acquisition systems that will require life cycle support from the CG support system are required to have an ILA. Commandant (CG-441) will conduct an ILA for non-major acquisitions at its discretion. Depending on the complexity of a non-major acquisition, Commandant (CG-441) will modify checklists to reflect the scope of a non-major project. An ILA assesses logistics planning and identifies supportability issues. The CG performs ILAs to ensure it properly plans logistics during a system's acquisition. An ILA evaluates acquisition logistics planning and identifies acquisition logistics issues that need attention. It provides an overview of the acquisition logistics process and identifies conflicting acquisition policies. For example, an ILA should identify any policy conflicts between Reference (a) and Reference (c). It does not focus on individual roles and responsibilities of sponsors, acquirers, and sustainers. The end objective is to use independent assessments to ensure timely awareness of potential deficiencies requiring immediate attention and corrective action. An ILA is not an assessment of an acquisition project team's performance.
 - b. **Decisions an ILA Supports.** An ILA provides critical information to decision makers. The findings from an ILA assist in three decision-making categories:
 - (1) Are acquisition logistics plans and resource documents adequate?

- (2) Are the processes that produce the acquisition logistics plans and resource documents adequate?
 - (3) Are the policies governing the processes that produce acquisition logistics plans and resource documents adequate?
- c. When to Conduct an ILA. An ILA provides information about logistics planning to CG executives responsible for overseeing acquisition projects. The results from an ILA are one source of information that those executives use to decide if a project should proceed to its next phase. In support of this decision-making process, the CG will conduct ILAs as follows:
- (1) Conduct the ILA so that it is completed no later than 2-months prior to major systems Acquisition Decision Event (ADE) 2A, ADE-2B, and ADE-3. Figure 2 shows the five phases of the major system acquisition process and the associated acquisition decision events. Reference (a) provides detailed guidance on the major systems acquisition process.

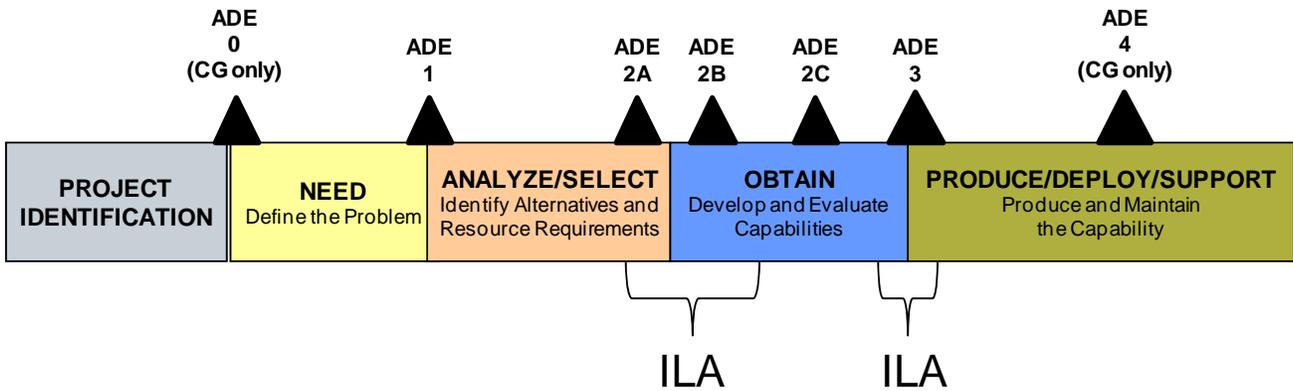


Figure 2: Major Systems Acquisition Process

- (2) Conduct the ILA so that it is completed no later than 2-months prior to non-major acquisition process ADE-2 and ADE-3. Commandant (CG-441) will conduct an ILA for non-major acquisitions at its discretion. Depending on the complexity of a non-major acquisition, Commandant (CG-441) will modify checklists to reflect the scope of a non-major project. Figure 3 shows the three phases of the non-major acquisition process and its associated acquisition decision events. Reference (b) provides guidance for non-major acquisitions.

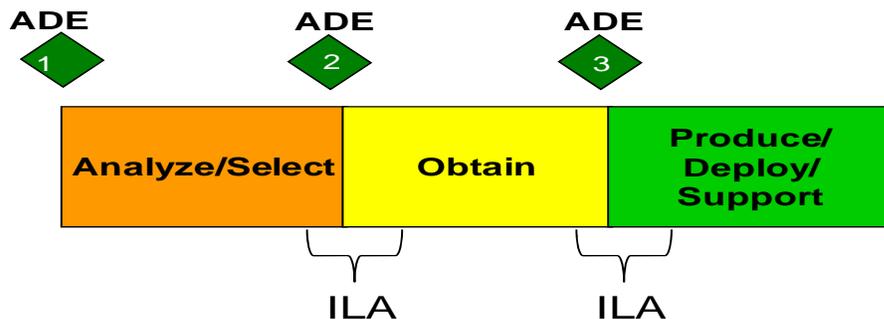


Figure 3: Non-Major Systems Acquisition Process

- (3) A project manager can request a waiver from the requirement to conduct an ILA mandated by this instruction. Project managers desiring a waiver shall submit their request in writing. The request shall identify why the project manager believes it would be appropriate to waive the ILA. Project managers shall route waiver requests as described below.
 - (a) For waivers that would cause a project to be non-compliant with Reference (d) policy on independent supportability and sustainment assessments, the project manager shall address the request to the CG Component Acquisition Executive (CAE). The project manager shall route the request to the CAE via the project manager's chain of command. The project manager shall send a copy of the request to the ILA program administrator and to all CG technical authorities.
 - (b) For waivers that will not cause a project to fall out of compliance with Reference (d) policy, the project manager shall route the request to the Deputy Commandant for Mission Support (DCMS). The project manager shall route the request via the project manager's chain of command. The project manager shall send a copy of the request to the ILA program administrator and to all CG technical authorities.

d. What an ILA Must Check. Each ILA will check all relevant plans and resource documents produced by the acquisition project team. It will also check applicable DCMS, Commandant (CG-9), Commandant (CG-93), Commandant (CG-1), Commandant (CG-4), Commandant (CG-6), Commandant (CG-8), and Commandant (CG-7) policies and processes.

- (1) An ILA must check the following characteristics of logistics plans and resource documents:
 - (a) Compliance with applicable policy documents, (e.g., Reference (a)).
 - (b) Fitness for use. The personnel who implement logistics plans must be able to understand them. The plans must be consistent. For example, the direction provided in the Project Management Plan must be consistent with direction provided in the Integrated Logistics Support Plan.
- (2) An ILA must check processes used to produce logistics plans and resource documents for:
 - (a) Compliance with applicable policy.
 - (b) Fitness for use.
- (3) An ILA must check the policies governing logistics planning for fitness for use.
- (4) The documentation that an ILA checks must be tailored to match the phase of the acquisition (ADE), as the scope and depth of logistics management information varies in maturity from phase to phase. Program/project offices support is required during the ILA to ensure the applicable information is promptly provided to the ILA team to ensure more efficient assessment and avoid delaying review activities to obtain documentation.

7. RESPONSIBILITIES.

- a. The Component Acquisition Executive shall act upon ILA waiver requests for waivers that would result in non-compliance with DHS policy.
- b. The Deputy Commandant for Mission Support (DCMS) shall:
 - (1) review quarterly reports on outstanding ILA findings and corrective actions;

- (2) act upon ILA waiver requests when the waiver would not cause a project to fall out of compliance with DHS policy.
- c. Assistant Commandant for Human Resources, Commandant (CG-1) shall:
 - (1) provide personnel for ILA teams as identified in the ILA schedule;
 - (2) submit corrective action plans to the ILA program administrator for each assigned corrective action;
 - (3) Submit quarterly corrective action status reports to the ILA program administrator prior to 1 October, 1 January, 1 April, and 1 July of each year.
 - d. Assistant Commandant for Engineering and Logistics, Commandant (CG-4) shall:
 - (1) provide personnel for ILA teams as identified in the ILA schedule;
 - (2) submit corrective action plans to the ILA program administrator for each assigned corrective action;
 - (3) Submit quarterly corrective action status reports to the ILA program administrator prior to 1 October, 1 January, 1 April, and 1 July of each year.
 - e. Assistant Commandant for Command, Control, Communications, Computers and Information Technology, Commandant (CG-6) shall:
 - (1) provide personnel for ILA teams as identified in the ILA schedule;
 - (2) submit corrective action plans to the ILA program administrator for each assigned corrective action;
 - (3) submit quarterly corrective action status reports to the ILA program administrator prior to 1 October, 1 January, 1 April, and 1 July of each year.
 - f. Assistant Commandant for Engineering and Logistics, Office of Logistics, Logistics Program Management Division, Commandant (CG-441) shall serve as the ILA program administrator. The ILA program administrator is responsible for the following:
 - (1) Producing and maintaining ILA schedules, with input from organizations responsible for submitting ILA schedule information. The purpose of these schedules is to identify ILA resources requirements. The roles and responsibilities for creating and executing the schedules are as follows.
 - (a) The organization responsible for submitting the ILA schedule information shall provide input to the ILA program administrator by 1 August of each year. The organization responsible for submitting ILA schedule information shall identify all ILAs it expects the CG will execute on its behalf during the next two fiscal years. For each planned ILA, the organization responsible for submitting ILA schedule information shall identify the following:
 1. Acquisition project.
 2. Associated ADE.
 3. ADE date (month and year).
 4. Date (month and year) the project will be ready for the ILA.

- (b) The ILA program administrator shall produce and distribute a two-year ILA schedule by 1 September of each year. The schedule will identify:
 - 1. Each planned ILA.
 - 2. The ADE the ILA will support.
 - 3. Month and year when the ILA will commence.
 - 4. ILA resource requirements, including the type and quantity of the resource required (such as funding or an ILA team member), and the organization responsible for providing the resource.
 - (c) Organizations responsible to provide ILA resources shall provide the funding or personnel identified in the ILA schedule.
- (2) Assigning the ILA team leader and ensuring ILA teams and their members satisfy the following requirements and qualifications:
- (a) ILA team requirements:
 - 1. Each team must have a team leader.
 - 2. Each team must be comprised of two to six members.
 - 3. Each team must have at least one member with knowledge of each logistics element (functional area). Reference (c) provides background on CG logistics elements.
 - (b) ILA team member qualifications:
 - 1. The team leader must have prior assessment experience.
 - 2. The team leader, or at least one team member, must have detailed knowledge of the acquisition process (major or non-major system) that Commandant (CG-9) is executing.
 - 3. Every member of the ILA team, including the team leader, must have work experience related to a logistics element (mission support).
 - 4. The team leader and all team members must be independent of the project that produced the logistics plans and resource documents that the ILA will check.
- (3) Issuing and maintaining an ILA process guide. The process guide will implement the policies in this Instruction. It will also outline the steps a team shall follow when it conducts an ILA. At a minimum, the process guide must provide direction in the following areas:
- (a) How to initiate the execution of an ILA. Major and non-major system project managers have the authority to initiate ILAs listed in the ILA schedule. They are also responsible for initiating ILAs in time to meet their project's ADE reporting requirements.
 - (b) ILA team composition and team member qualifications.
 - (c) Contents of an ILA plan. Prior to executing an ILA, each ILA team must prepare a plan outlining how they will conduct the ILA.
 - (d) Data gathering tools and checklists.
 - (e) Kickoff meetings and status update meetings.

- (f) ILA findings. Each ILA must provide no more than six findings related to logistics plans and resource documents, and no more than six findings related to the processes and policies that governed production of the logistics plans and resource documents. At least one fact must support each finding, and each finding must be worthy of corrective action. The process guide must define what constitutes a fact and provide direction on what situations are worthy of corrective action.
- (g) Final ILA report. Each ILA must produce an exit brief to stakeholders and a written report. The ILA team must identify all findings during the exit brief. The written report will only contain the findings identified at the exit brief.

The ILA team leader is responsible for preparing the ILA final report, coordinating it with the project office personnel, and submitting it to the project manager, the PEO, and Technical Authorities. The decision makers should use the report to verify the adequacy of the project's support planning and implementation prior to ADEs or technical reviews. The Final Report should clearly distinguish issues that need to be resolved and the timeframe for resolution.

The following restrictive legend must appear at the top of the first page of the written report and on all other pages in the report.

NOTICE OF DHS MANAGEMENT RESTRICTIVE LEGEND: INTERNAL USE ONLY. BY USING THE CONTENTS OF THIS RECORD YOU ACCEPT THESE TERMS AND AGREE NOT TO REMOVE THE RESTRICTIVE LEGEND FROM THE RECORD. DO NOT FURTHER RELEASE OUTSIDE OF THE DEPARTMENT OF HOMELAND SECURITY. THIS RECORD RELATES TO PROCUREMENT SENSITIVE INFORMATION. IT MAY BE EITHER AN ATTORNEY CLIENT PRIVILEGED INFORMATION RECORD OR EXEMPT FROM RELEASE TO THE PUBLIC UNDER THE FREEDOM OF INFORMATION ACT, UNDER 5 U.S.C. SEC. 552. IT MAY CONTAIN CONFIDENTIAL ATTORNEY-CLIENT COMMUNICATIONS RELATING TO A LEGAL MATTER FOR WHICH THE CLIENT HAS SOUGHT PROFESSIONAL ADVICE OR IT IS A PREDECISIONAL MANAGEMENT INFORMATION RECORD. IN ADDITION, FAR PART 15.609 RESTRICTIONS MAY ALSO BE VIOLATED IF RELEASED OUTSIDE THE AGENCY.

- (4) Monitoring the status of corrective action. The ILA program administrator shall implement and execute an ILA corrective action monitoring system. The ILA program administrator shall provide detailed instructions about the corrective action monitoring system in the ILA process guide. The process guide must provide direction in the following areas:
 - (a) For each ILA finding, the ILA program administrator shall assign the approved corrective action responsibility to an appropriate organization. If multiple organizations share responsibility, the ILA program administrator shall assign responsibility to one organization to lead the corrective action effort.
 - (b) The ILA program administrator shall provide a copy of the ILA written report to each organization responsible for taking or leading the approved corrective actions.
 - (c) Within 30 days of receipt of the ILA written report, each organization responsible for the approved corrective actions shall submit a proposed corrective action plan. Each

approved corrective action plan must identify the intended actions and the associated schedule.

- (d) The organization responsible for the approved corrective action shall submit quarterly status reports to the ILA program administrator until the approved corrective action is fully implemented (e.g., the revised plan or policy is approved and signed) and the ILA program administrator closes the finding. Quarterly status reports are due to the ILA program administrator by 1 October, 1 January, 1 April, and 1 July of each year.
- (e) The ILA program administrator shall maintain a list of outstanding ILA findings, and submit consolidated quarterly reports to DCMS on the status of all outstanding ILA findings and corrective actions. Those reports are due to DCMS by 1 November, 1 February, 1 May, and 1 August of each year.

g. Assistant Commandant for Acquisition, Director of Acquisition Programs, Commandant (CG-93) shall submit ILA schedule input to the ILA program administrator prior to 1 August of each year.

h. Major and non-major acquisition project managers shall:

- (1) initiate ILAs so they are completed no later than 2-months prior to ADE deadlines;
- (2) provide funding for ILAs in accordance with the ILA schedule;
- (3) follow the requirements in this Instruction when submitting ILA waiver requests.

i. ILA teams shall execute their ILA in accordance with this Instruction and the ILA process guide.

8. FORMS/REPORTS. None.

T. P. OSTEBO/s/
Rear Admiral, U.S. Coast Guard
Assistant Commandant for Engineering and Logistics