



DEPARTMENT OF DEFENSE  
Defense Contract Management Agency

# IMMEDIATE POLICY CHANGE

## Integrated Surveillance Plan

Engineering and Analysis (EA)  
OPR: DCMA-EA

DCMA-INST 221 (IPC-1)  
April 14, 2014

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**1. POLICY.** This Immediate Policy Change (IPC) implements changes to DCMA-INST 221, “Integrated Surveillance Plan,” dated December 4, 2013.

**2. PURPOSE.** DCMA General Counsel has requested removal of paragraphs 3.5 “Security Statement” and modifying 3.6 “Special Programs Statement” from DCMA-INST 221.

**3. APPLICABILITY.** This IPC applies to all DCMA Headquarters (HQ) functional components having policies for mission processes requiring planned surveillance.

**4. NEW GUIDANCE.** The following sections/paragraphs as marked in “red” with a strikethrough have been removed from the Instruction:

4.1. TABLE OF CONTENTS (TOC), Page 3 – deleted paragraphs 3.5  
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4.2. CHAPTER 3, Page 11 – deleted paragraphs 3.5 and 3.6

~~**3.5. SECURITY STATEMENT.** A security statement which references DCMA-INST 552, “Information Security Program” (Reference (k)) shall be added to “Chapter 1” to each revised instruction stating the following:~~

~~—“**1.x. SECURITY.** Protecting information is critical and integral when conducting the processes associated with this Instruction. DCMA personnel are responsible for protecting classified and controlled unclassified information (CUI) entrusted to them. Prudent steps shall be taken to ensure final disposition of classified and CUI per DCMA and DoD policy. These procedures vary based on the type, access, and nature of the material involved. Refer~~

April 14, 2014

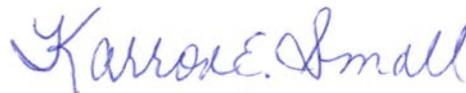
~~to DCMA-INST 552, "Information Security Program" (Reference (xx)) for guidance in the control, transmission, destruction, and storage of such material."~~

**3.6. SPECIAL PROGRAMS STATEMENT.** A special program statement shall be added to ~~"Chapter 1" "Page 1"~~ to each new and revised surveillance instruction in accordance with paragraph 1.1. stating the following:

**"2. APPLICABILITY.** This Instruction applies to all DCMA activities unless higher-level regulations, policy, guidance, waiver, or agreements take precedence; e.g., DCMA International and Special Programs. For classified contracts with security requirements, exceptions to this Instruction shall be in accordance with supplemental instructions maintained by the Special Programs Directorate."

**5. RELEASABILITY – UNLIMITED.** This IPC is approved for public release and is located on DCMA's Internet Web site, <https://home.dcma.mil/POLICY/221r/index.cfm>.

**6. EFFECTIVE DATE.** By order of the Acting Director, DCMA, this IPC is effective immediately and shall remain in effect for 180 days from the date of signature or until rescinded, superseded, or incorporated in a DCMA policy, whichever is sooner.



Karron E. Small  
Executive Director  
Engineering and Analysis



**DEPARTMENT OF DEFENSE**  
**Defense Contract Management Agency**

# **INSTRUCTION**

## **Integrated Surveillance Plan**

**Engineering and Analysis Directorate**  
**OPR: DCMA-EA**

**DCMA-INST 221**  
**December 4, 2013**

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**1. PURPOSE.** This Instruction:

a. Establishes policy and assigns responsibilities governing surveillance plans for DCMA's Contract Administration Services (CAS) and Contingency CAS surveillance activities as specified in Federal Acquisition Regulation (FAR) subpart 42.302(a), "Contract Administration Functions" (Reference (a)), FAR subpart 42.11, "Production Surveillance and Reporting" (Reference (b)), and Defense Federal Acquisition Regulation (DFARS) subpart 242.11, "Production Surveillance and Reporting" (Reference (c)).

b. Defines procedures for developing, approving, and monitoring of surveillance plans that are event-based, prioritized, and managed through a risk management process in accordance with DFARS subpart 242.1104, "Surveillance Requirements" (Reference (d)), DCMA Instruction (DCMA-INST) 219, "Supplier Risk Management Through Contract Surveillance" (Reference (e)), and customer specified critical or high risk surveillance requirements.

c. Complies with DoD Directive (DoDD) 5105.64, "Defense Contract Management Agency (DCMA)" (Reference (f)).

**2. APPLICABILITY.** This Instruction applies to all DCMA Headquarters (HQ) functional components having direct mission policies through planned surveillance activities. This Instruction provides the standard methodology for surveillance planning to be incorporated into DCMA instructions and annexes as appropriate. Exceptions to this Instruction for classified contracts/programs, due to security requirements, shall be processed in accordance with supplemental instructions maintained by the Special Programs Directorate.

**3. MANAGERS' INTERNAL CONTROL PROGRAM.** In accordance with DCMA-INST 710, "Managers' Internal Control Program" (Reference (g)), this Instruction is subject to evaluation and testing. The process flow chart is located at Appendix A.

**4. RELEASABILITY – UNLIMITED.** This Instruction is approved for public release.

**5. PLAS CODE.** 191 – Plans and Policy Deployment (Non-Process Specific)

**6. POLICY RESOURCE WEB PAGE.** <https://home.dcma.mil/policy/221r>

**7. EFFECTIVE DATE.** By order of the Director, DCMA, this Instruction is effective December 4, 2013, and all applicable activities shall be fully compliant within 60 days from this date.

A handwritten signature in cursive script that reads "Karron E. Small".

Karron E. Small  
Executive Director  
Engineering and Analysis

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## REFERENCES

- (a) Federal Acquisition Regulation, subpart 42.302(a), “Contract Administration Functions”
- (b) Federal Acquisition Regulation, subpart 42.11, “Production Surveillance and Reporting”
- (c) Defense Federal Acquisition Regulation Supplement, subpart 242.11, “Production Surveillance and Reporting”
- (d) Defense Federal Acquisition Regulation Supplement, subpart 242.1104, “Surveillance Requirements”
- (e) DCMA-INST 219, “Supplier Risk Management Through Contract Surveillance,” May 22, 2013
- (f) DoD Directive 5105.64, “Defense Contract Management Agency (DCMA)” January 10, 2013
- (g) DCMA-INST 710, “Managers’ Internal Control Program,” September 12, 2011
- (h) DCMA-INST 501, “Policy Publications Program,” October 1, 2013
- (i) DCMA-INST 205, “Major Program Support,” December 4, 2013
- (j) DCMA-ANX 205-02, “Program Support Plan”
- (k) DCMA-INST 552, “Information Security Program,” August 2004

## CHAPTER 1

### POLICY

**1.1. PURPOSE.** Surveillance planning shall be mandatory for all DCMA functional components that have surveillance responsibilities. This Instruction provides the surveillance planning framework for DCMA functional component instructions and annexes. All DCMA functional components shall:

1.1.1. Update their surveillance planning instruction(s), annex(es), and applicable templates to conform with Chapter 3, Procedures. This will ensure that all functional component surveillance events and activities to be performed in the execution of DCMA's CAS mission can be integrated and managed.

1.1.1.1. Utilize a common vocabulary in all policy artifacts. (**NOTE:** "Table 1. Surveillance Plan Template – Common Surveillance Vocabulary" link is located on the resource page for this Instruction.)

1.1.1.2. Utilize a set of common controls for surveillance plans, to include identifying who is responsible for reviewing and approving plans.

1.1.1.3. Utilize a set of common planning templates as appropriate given the planning requirements of the applicable functional component policy being executed, to include a contract, facility, program, and team template.

**1.2. TRANSITION PLAN.** Effective upon publication of this Instruction, all functional component heads shall revise their surveillance planning policies to align with this Instruction as part of the yearly revision cycle.

## CHAPTER 2

### ROLES AND RESPONSIBILITIES

**2.1. EXECUTIVE DIRECTOR, ENGINEERING AND ANALYSIS (EA).** The Executive Director, EA shall:

2.1.1. Notify DCMA functional components of the deployment schedule for the Integrated Surveillance Plan automated solution tool.

2.1.2. Incorporate the standard surveillance plan elements and controls as per this Instruction into EA's functional surveillance policies as part of the annual revision cycle.

**2.2. DIRECTOR, ENGINEERING AND ANALYSIS DIRECTORATE, INTEGRATED POLICY AND TOOLS DIVISION (DCMA-EAI).** The Director, DCMA-EAI shall:

2.2.1. Serve as the Agency central point of contact (POC) and advocate for all integrated surveillance planning policy, training, and tools.

2.2.2. Provide base resources to develop and monitor policy implementation, identify and/or develop training requirements, and identify and/or develop tools necessary to implement this Instruction.

**2.3. EXECUTIVE DIRECTOR, AIRCRAFT OPERATIONS (AO).** The Executive Director, AO shall incorporate the standard surveillance plan elements and controls per this Instruction into AO's functional surveillance policies as part of the annual revision cycle.

**2.4. EXECUTIVE DIRECTOR, CONTRACTS (AQ).** The Executive Director, AQ shall incorporate the standard surveillance plan elements and controls per this Instruction into AQ's functional surveillance policies as part of the annual revision cycle.

**2.5. EXECUTIVE DIRECTOR, QUALITY ASSURANCE (QA).** The Executive Director, QA shall incorporate the standard surveillance plan elements and controls per this Instruction into QA's functional surveillance policies as part of the annual revision cycle.

**2.6. EXECUTIVE DIRECTOR, PORTFOLIO MANAGEMENT AND INTEGRATION (PI).** The Executive Director, PI shall incorporate the standard surveillance plan elements and controls per this Instruction into PI's functional surveillance policies as part of the annual revision cycle.

**2.7. EXECUTIVE DIRECTOR, INFORMATION TECHNOLOGY (IT).** The Executive Director, IT shall develop data collection architecture and reporting capability to analyze and display the surveillance plans described in Chapters 1 and 3.

## CHAPTER 3

### PROCEDURES

**3.1. OVERVIEW.** DCMA functional components shall meet the requirements of this Instruction in their surveillance planning policies to ensure compliance with the following:

- FAR, subpart 42.302(a), “Contract Administration Functions” (Reference (a))
- FAR, subpart 42.11, “Production Surveillance and Reporting” (Reference (b))
- DFAR, subpart 242.11, “Production Surveillance and Reporting” (Reference (c))
- DCMA-INST 219, “Supplier Risk Management Through Contract Surveillance” (Reference (e))
- Surveillance Plan Template, Table 1 - Common Surveillance Vocabulary (**NOTE:** Link is located on the resource page for this Instruction)

3.1.1. DCMA functional surveillance policies shall comply with this Instruction as part of their next required yearly update per DCMA-INST 501, “Policy Publications Programs” (Reference (h)) after the effective date of this policy.

3.1.2. Functional surveillance policy advocates shall contact DCMA-EAI as part of the informal review coordination. (**NOTE:** Link of potential DCMA Instructions impacted are in the excel spread sheet titled “ISP References” located on the resource page for this Instruction.)

**3.2. SURVEILLANCE PLANNING PROCESS.** DCMA functional executive component surveillance planning processes include six steps to ensure surveillance activities are properly planned and managed:

- Surveillance requirements identification
- Risk assessment
- Delegation of risk associated requirements
- Surveillance event selection (mandatory and risk-based)
- Surveillance resourcing and scheduling
- Risk management of surveillance requirements

3.2.1. Requirements Identification. Requirements identification is the collective process of identifying surveillance opportunities through contract receipt and review (CRR), supply chain analysis (SCA), delegation review and memorandums of agreement (MOA)/letters of commitment (LOC).

3.2.1.1. Contract Receipt and Review (CRR). CRR (including contract technical review (CTR)) is the detailed review of a contract by the contract management office (CMO) contracting office and functional components that have surveillance responsibilities in the contract. The CRR data set should include contract criticality data (e.g., FAR 42.11 (Reference (b)) and DFARS, 242.1104 (Reference (d))). The CRR data set should also include the specific requirements the contractor must deliver or comply with as specified in the contract (e.g., FAR/DFARS, deliverables such as contract line item number (CLIN) or contract data

requirements list (CDRL)), processes and testing). Each HQ functional component shall have a CRR/CTR checklist to provide guidance to DCMA field operations in performing contract reviews.

3.2.1.2. Customer Requirements Analysis (CRA). CRA is the collective process of identifying the requirements imposed on DCMA by the customer or delegating DCMA activities to be included in the surveillance planning process. These requirements are determined through review of letters of delegation, MOAs, LOCs, and QA letters of instruction (QALI). The requirements identified as a result of the CRA are used as inputs to the surveillance event selection process.

3.2.1.2.1. Quality Letters of Instruction (QALI). CRA data documented in QALI shall be included in the surveillance activities for inclusion in the surveillance planning process.

3.2.1.3. Supply Chain Analysis (SCA). SCA begins with identifying the performance strengths and weaknesses of DoD's supply chain through past performance analysis, process reviews, and pre-award surveys. Identification of these factors provides guidance to initial requirements identification of surveillance planning activities. The level of effort in performing SCA should be based on criticality and risk as defined by DCMA-INST 219 (Reference (e)).

3.2.2. Delegation of Risk Associated Requirements. Delegation should occur for any requirement that cannot be verified at the prime CMO. Prime CMOs are responsible for ensuring delegations are properly discussed, issued, and received while supporting CMOs receiving delegations should acknowledge receipt of delegated work after appropriate discussion has occurred and perform the required surveillance tasks.

3.2.2.1. Delegation of a Major Program. When the delegation is in support of a Major Program, the supporting CMO shall follow all the guidance given in the DCMA Instructions for the sub-level effort in accordance with DCMA-INST 205, "Major Program Support" (Reference (i)) and DCMA-ANX 205-02, "Developing a Program Support Plan" (Reference (j)), as applicable.

3.2.3. Surveillance Event Selection (Mandatory and Risk-Based). DCMA functional components surveillance plans shall describe and document appropriate surveillance events or activities for each area of risk that is linked to the surveillance requirements identification process as defined in paragraph 3.2.1. This should include those customer mandatory requirements identified during the Customer Requirements Analysis defined in paragraph 3.2.1.2.

3.2.4. Surveillance Resourcing and Scheduling (SR&S). SR&S occurs once the selected surveillance events and activities are identified. Resourcing shall also address the expected level of effort (e.g., how much time) to be expended on each event. The discrete resource requirements across all functional component areas shall be rolled-up by Total Hours Needed, Total Allocated Hours, and Total Unallocated Hours.

3.2.5. Management of Surveillance Requirements. Executive functional components shall develop appropriate risk criteria in accordance with DCMA-INST 219 (Reference (e)).

3.2.5.1. Management of surveillance risk requirements should be initiated once the surveillance requirements are identified. Budgets and resources (or lack thereof) may preclude performing the 100 percent solution on 100 percent of the requirements in order to drive every requirement to low risk levels. Therefore, each area identified for surveillance should be risk rated by functional area to assist in the allocation of resources to those activities because resource limitations may prevent surveillance on everything in the contract or as may be required by DCMA functional component policies, FAR/DFARS, and other regulatory requirements.

3.2.5.2. During the implementation of DCMA-INST 219 (Reference (e)), various risk models may be used; however, any model used shall include an objective methodology to assess Likelihood (Probability) and Consequence (Impact) using the risk reporting matrix prescribed by DCMA-INST 219 (Reference (e)).

3.2.5.3. Risk determinations shall be documented and include statements regarding specific actions (e.g., those activities performed and not performed). The result of employing risk management procedures yields a list of risk associated requirements. These requirements may be addressed at the prime CMO or be candidates for delegation to supporting CMO(s).

**3.3. INTEGRATED SURVEILLANCE PLAN TEMPLATES.** The process for moving to an Agency solution for a set of integrated surveillance plan templates will be iterative.

3.3.1. Once an integrated surveillance plan automated solution is available, the Executive Director, EA shall notify DCMA functional components of the deployment schedule for this tool. Functional surveillance policies shall identify the level of surveillance planning required using the following surveillance plan templates once the automated solution has been deployed. (NOTE: Surveillance plan templates link are located on the resource page for this Instruction.) Templates outlined in paragraphs 3.3.1.1 through 3.3.1.5 are not intended to be implemented absent the automated solution; however, they have been incorporated into the resource page of this Instruction to clearly define the “end state” objective of the integrated surveillance plan.

3.3.1.1. Contract Surveillance Plan Template (CSPT). The CSPT identifies all required surveillance activities on a contract. The CSPT is augmented by contract specific and facility specific annexes utilizing linkages to those individual documents.

3.3.1.2. Facility Surveillance Plan Template (FSPT). The FSPT identifies all required surveillance activities relating to business and technical processes at a given business unit. The FSPT is augmented by related contract plans, contract specific and facility specific annexes, and will utilize linkages to those individual documents. The FSPT is also associated with program support plans, where applicable.

3.3.1.3. Program Surveillance Plan Template (PSPT). The PSPT identifies through a summary roll-up the functional surveillance activities of program support teams and support

program support teams in the administration of Major Program Support contracts as per DCMA-INST 205 (Reference (i)).

3.3.1.4. Surveillance Plan Template Content. The surveillance plan template – common surveillance vocabulary table shall contain the following sections (Link is located on the resource page for this Instruction):

- Cover sheet
- Purpose
- Contractor and suppliers
- POC
- Event-based surveillance table
- Program support plan
- Delegations
- MOA(s)
- Event risk rating
- Supplier risk rating
- Contract risk rating
- Data analysis

**NOTE:** Where a section is not relevant to a particular template type, that section shall be marked “not applicable” or “N/A.”

3.3.2. Surveillance planning using the surveillance plan templates provides the fundamental requirements that include the following information: event-based, risk-based, resourced, and scheduled. These planning activities are addressed in the following sections:

3.3.2.1. Event Activity-Based. Events and activities are the empirical unit upon which DCMA surveillance is based. It could be preparing and attending a program meeting where contractual requirements are discussed, conducting a review, or performing an inspection. A surveillance plan should describe a series of events for each area of interest.

3.3.2.2. Risk-Based. Typically, risk is a determination incorporating likelihood and consequence of occurrence. Risk determinations can be made at the process, program, facility, or DCMA organization level. Some events and activities may be required by customer request (e.g., NASA), policy, regulation, or public law and therefore are not subjected to risk assessment.

3.3.2.3. Resourced-Based. The surveillance plan should identify the resources needed to execute the plan. Resourcing should address the skillset that will execute the surveillance activities. Resourcing should also address the expected level of effort (i.e., how much time) that will be expended on each event. These discrete resource requirements should be able to be rolled-up to describe the total level of effort required to complete the surveillance plan.

3.3.2.4. Scheduled-Based. All events and activities will be scheduled showing the events, resourcing, frequency, and/or timeline for accomplishment.

3.3.3. Contract, Facility, and Team Surveillance Plan Approval Process. CMO commanders shall develop a local procedure for review and approval of the contract, facility, and team surveillance plans. For functional annex(es), the cognizant functional component head shall address the review and approval process for the related surveillance planning instructions.

3.3.4. Review of Existing Surveillance Plans. Surveillance plans and annex(es) shall be reviewed at least annually, or more frequently, in accordance with relevant DCMA instructions, CMO local procedures, or contractual requirements.

**3.4. NAMING CONVENTIONS FOR SURVEILLANCE PLANS.** Naming conventions for surveillance plans shall use the Integrated Workload Management System (IWMS) Document Identifier Taxonomy upon deployment of the IWMS system. (**NOTE:** Link is located on the resource page for this Instruction.)

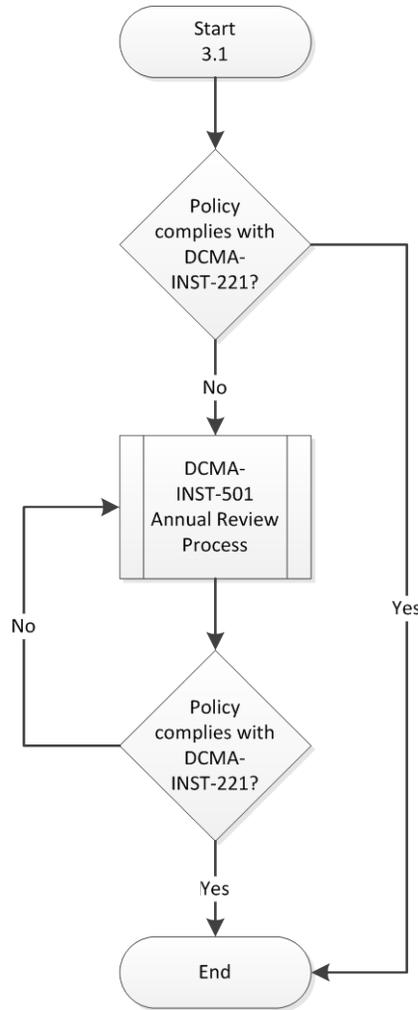
**3.5. SECURITY STATEMENT.** A security statement which references DCMA-INST 552, “Information Security Program” (Reference (k)) shall be added to “Chapter 1” to each revised instruction stating the following:

“**1.x. SECURITY.** Protecting information is critical and integral when conducting the processes associated with this Instruction. DCMA personnel are responsible for protecting classified and controlled unclassified information (CUI) entrusted to them. Prudent steps shall be taken to ensure final disposition of classified and CUI per DCMA and DoD policy. These procedures vary based on the type, access, and nature of the material involved. Refer to DCMA-INST 552, “Information Security Program” (Reference (xx)) for guidance in the control, transmission, destruction, and storage of such material.”

**3.6. SPECIAL PROGRAMS STATEMENT.** A special program statement shall be added to “Chapter 1” to each revised instruction stating the following:

“**2. APPLICABILITY.** This Instruction applies to all DCMA activities unless higher-level regulations, policy, guidance, waiver, or agreements take precedence; e.g., DCMA International and Special Programs. For classified contracts with security requirements, exceptions to this Instruction shall be in accordance with supplemental instructions maintained by the Special Programs Directorate.”

**APPENDIX A**  
**PROCESS FLOWCHART**



<b>Key Controls</b>			
<b>Control</b>	<b>Functional Area</b>	<b>Risk</b>	<b>Possible Controls</b>
1	All	Failure to identify a policy that governs a surveillance process	<p>Policy Program Manager/Correspondence Control Team ensures functional policy owners are aware of DCMA-INST-501 review requirements</p> <p>Policy Advisory Board (PAB) enforces DCMA-INST-501 requirements</p> <p>Functional policy owner annually reviews policies</p>
2	All	Functional policy owner does not comply with DCMA-INST-221	<p>EAI ensures functional policy owners are aware of DCMA-INST-221 requirements</p> <p>PAB enforces DCMA-INST-221 requirements</p>
3	DS	Functional policy owner does not comply with DCMA-INST-501	<p>Policy Program Manager/Correspondence Control Team ensures functional policy owners are aware of DCMA-INST-501 requirements</p> <p>PAB enforces DCMA-INST-501 requirements</p>

## GLOSSARY

### DEFINITIONS

**activity.** Any action not covered by an event (as defined below).

**business unit.** A organizational team with the DCMA organizational structure.

**common vocabulary.** A set of common terms with common meaning which are the basis for an integrated surveillance planning data environment

**controlled unclassified information.** Unclassified information that requires safeguarding or dissemination controls, pursuant to and consistent with applicable law, regulations, and Government-wide policies.

**critical program suppliers.** Subcontractors whose failure to perform can significantly diminish program success and is independent of contract value or earned value (EV) requirement.

**event.** An event is a real activity that can be scheduled and demonstrated through action such as preparing and attending a meeting, conducting a review, or performing an inspection.

**major programs.** Includes all ACAT I and II (to include but not limited to major defense acquisition programs (MDAP) and major automated information systems (MAIS)) and other programs considered high priority as determined by the CMO commander/director in collaboration with the applicable sector director.

**level of effort (LOE).** The total LOE required for all events and activities identified during Surveillance Event Selection (Total Hours Needed = Total Allocated Hours + Total Unallocated Hours).

**major program suppliers.** Subcontractors or other prime corporate business units that have contractual EV requirements or represent a significant percentage of the contract acquisition cost (e.g., at least 20 percent of contract acquisition cost).

**Program Memorandum of Agreement (MOA).** The program MOA is a bi-lateral/multi-lateral document endorsed by the CMO commander/director and PMO Manager, which identifies the goals of DCMA support.

**surveillance plan annex.** The aggregate functional component of a surveillance plan.

**surveillance plan template.** A standard template which is used for documenting surveillance plans and their component annexes.

## ACRONYMS

ACAT	acquisition category
ACO	administrative contracting officer
AO	Air Operations
AQ	Contracts
CAS	contract administration services
CDRL	contract data requirements list
CLIN	contract line item number
CMO	contact management office
CRA	customer requirements analysis
CRR	contract receipt and review
CSPT	contract surveillance plan template
CTR	contract technical review
CUI	unclassified information
DCMA-EAI	Engineering and Analysis Directorate, Integrated Policy and Tools Division
DCMA-INST	DCMA Instruction
DoDD	DoD Directive
DFARS	Defense Federal Acquisition Regulation Supplement
EA	Engineering and Analysis
EV	earned value
FAR	Federal Acquisition Regulation
FLS	first level supervisor
FSPT	facility surveillance plan template
HQ	headquarters
IT	information technology
IWMS	Integrated Workload Management System
LOC	letters of commitment
LOE	level of effort
MOA	memorandum of agreement
OPR	office of primary responsibility
PAB	Policy Advisory Board
PI	Portfolio Management and Integration
PLAS	performance labor accounting system
POC	point of contact

PSPT	program surveillance plan template
QA	Quality Assurance
QALI	QA letter of instruction
SCA	supply chain analysis
SR&S	surveillance resourcing and scheduling
TSPT	team surveillance plan template