

# DCMA Manual 2303-01, Volume 8 Surveillance: Contract Safety

Office of Primary

Responsibility: Contractor Effectiveness Capability Board

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Resource Page Link: <a href="https://dod365.sharepoint-mil.us/sites/DCMA-BCF-Contractor">https://dod365.sharepoint-mil.us/sites/DCMA-BCF-Contractor</a> Effectiveness/SitePages/DCMA-

MAN-2303-01--Surveillance-.aspx?

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**Purpose:** This manual is composed of several volumes, each containing guidance and requirements for surveillance. In accordance with the authority in DoD Directive 5105.64 and DCMA Instruction 2303, "Surveillance," this volume implements policy, assigns responsibilities, and provides procedures for the planning and execution of contract safety surveillance.

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# **SECTION 1: GENERAL ISSUANCE INFORMATION**

### 1.1. APPLICABILITY.

This volume applies to all DCMA personnel performing contract safety (CS) functions unless higher level regulations, policy, guidance, or written agreements take precedence.

### 1.2. POLICY.

This paragraph requires no additional details beyond the requirements, information, and guidance in accordance with Volume 1 of DCMA Manual (DCMA-MAN) 2303-01.

### 1.3. SPECIFIED FORMS AND INFORMATION COLLECTION.

This paragraph requires no additional details beyond the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01.

### 1.4. SUMMARY OF CHANGES.

This volume is a new issuance and must be reviewed in its entirety.

# **SECTION 2: RESPONSIBILITIES**

#### 2.1. COMPONENT HEADS AND CAPABILITY BOARD MANAGERS.

This paragraph requires no additional details beyond the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01.

# 2.2. OPERATIONAL UNIT COMMANDERS, DIRECTORS, AND CENTER DIRECTORS.

This paragraph requires no additional details beyond the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01.

# 2.3. CONTRACT MANAGEMENT OFFICE COMMANDERS AND DIRECTORS.

This paragraph requires no additional details beyond the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01.

## 2.4. FUNCTIONAL DIRECTORS, DEPUTIES, AND GROUP LEADERS.

In addition to the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01, CS utilizes program managers instead of functional directors, deputies, and group leaders. Program managers must complete non-supervisory responsibilities within Paragraph 2.4. of Volume 1 of DCMA-MAN 2303-01 as they relate to their positions.

#### 2.5. SUPERVISORS.

In addition to the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01, supervisors must perform responsibilities pursuant to Paragraphs 2.4.e., 2.4.f., 2.4.h., and 2.4.i. of Volume 1 of DCMA-MAN 2303-01.

### 2.6. FUNCTIONAL SPECIALIST (FS).

In addition to the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01, FS must conduct surveillance in accordance with this volume and DCMA-MAN 2301-07, "Contract Safety," and utilize guidance from the CS Consolidated Guidebook located on resource page of this manual.

#### 2.7. ADMINISTRATIVE CONTRACTING OFFICER.

# **SECTION 3: SURVEILLANCE OVERVIEW**

### 3.1. SURVEILLANCE OVERVIEW.

The following requirements, information, and guidance are in addition to the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01. The FS will use CS surveillance applications (e.g., Product Data Reporting and Evaluation Program (PDREP), Risk Based Schedule, Risk Assessment Matrix (RAM)) to assist CS personnel with performing post award surveillance planning and the development of industrial, ammunition/explosives (AE), aircraft, and contractor surveillance plans.

# 3.2. SURVEILLANCE GUIDANCE.

# **SECTION 4: RISK ASSESSMENT**

The following requirements, information, and guidance are in addition to the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01:

#### 4.1. PREPARING FOR RISK ASSESSMENT.

Before building a surveillance plan, the FS must verify the contract is mission work in accordance with DCMA-MAN 4502-02, "Workload Acceptance." The FS will review the contract and utilize guidance from the CS Contract Receipt and Review (CRR) Job Aid. If the workload is accepted, the FS must verify the physical places of performance requiring surveillance to determine if a delegation is required.

- a. CS key contract requirements (KCR) include the following with three complimentary aircraft operations (AO) KCRs:
  - KCR-CS-0001 Ground and Flight Risk. AO uses KCR-AO-0001
  - KCR-CS-0002 Arms, Ammunition and Explosives.
  - KCR-CS-0003 Mishap Reporting and Investigating Aircraft, Missiles, and Space Vehicles. AO uses KCR-AO-0002
  - KCR-CS-0004 Contractor's Flight and Ground Operations. AO uses KCR-AO-0005
  - KCR-CS-0007 Grant, Agreement or Other Transaction.
  - KCR-CS-0008 Protection of AF Property during Rework.
  - KCR-CS-A001 ECARS FS Service Set, for awareness only.
  - KCR-CS-A002 Other Agency Accepted Work Requirements, for awareness only.
- b. The FS will develop a surveillance plan using the applicable KCRs and initiate any needed delegations.
- c. The FS will conduct post award safety surveillance to validate the contractor's contractual safety compliance and will schedule post awards via a surveillance plan in PDREP. Risk ratings for CS are identified as high, moderate, or low. The frequency of post award safety surveillance will primarily be based upon the degree of risk, the magnitude of potential government loss associated with the type of work being performed, and the material involved. Elevated risk or unique circumstances may drive more frequent surveillance.
- d. CS personnel assigned to an aviation program team must understand the requirements for surveillance in accordance with Volume 2 of DCMA-MAN 2303-01, "Surveillance: Aircraft Operations."

#### 4.2. RISK ASSESSMENT PROCESS.

- a. CS surveillance is focused on the processes designed to mitigate risk for product or asset protection. When conducting the risk assessment for each of these processes, the FS will determine:
  - (1) Consequences of an identified process failure in terms of contract performance.
  - (2) Likelihood the process failure will occur.
- (3) The resulting risk rating of a requirement to prioritize surveillance and surveillance frequency.
- b. The FS performs risk assessments on the process that the contractor uses to comply with applicable KCRs. The FS documents KCRs during the CRR process in the Integrated Workload Management System. Regardless of which KCR is used, the FS must assign the applicable contractor systems or processes in PDREP. The FS risk assesses the processes in the surveillance plan. The minimum level of detail expected for a CS surveillance plan is to the process level.
- c. Other functional areas may have surveillance that is identified as low risk, and the FS may not perform surveillance due to this risk or resource availability; however, CS surveillance is mandatory in accordance with Subparts 42.302(a)(39) and (a)(56) of the Federal Acquisition Regulation, DoD Manual 4145.26, DCMA-INST 8210-1D, "Contractor's Flight and Ground Operations," and DCMA-MAN 2301-07. For CS, the basis of risk assessment is to prevent loss and damage to DoD assets. The FS will only apply risk to the performance area (i.e., Risk Consequence Performance, Rationale for Risk Consequence Performance). CS focuses on reducing the inherent risk of the Defense Industrial Base.
- d. The FS will assess risk of the contractor's operations by using the CS Industrial, AE, or Aircraft RAM and include, at a minimum, the risk consequence, risk likelihood, risk rating, and documented detailed rationale for each risk assessment. CS RAM templates are located on the resource page for this manual.
- e. The FS will use the output of the CS RAM to build the surveillance plan in PDREP. The FS will:
- (1) Input one surveillance plan line item at the KCR level to document overall rated risk. Pull risk from the first tab of the CS RAM and develop rationale based on the identified circumstances.
- (2) Use the appropriate CS RAM tab to determine risk for the surveillance plan process level items (e.g., use the "Aircraft Rescue and Fire Fighting" tab rating and circumstances for aircraft rescue and fire fighting surveillance and the safety tab for safety program surveillance).

## **SECTION 5: SURVEILLANCE PLANNING**

#### 5.1. SURVEILLANCE PLANNING.

The following requirements, information, and guidance are in addition to the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01:

#### a. Overview.

The FS will develop a CS surveillance plan for all active contractors. A surveillance plan is based on a combination of requirements from the contract, such as complexity of operations, type of processes, number of facilities and locations, and documented risk levels. The FS will then prioritize surveillance, select the type of surveillance, and schedule surveillance. The surveillance plan consists of two parts in PDREP: the Contractor Details section and the KCR Table. Plans continually evolve and should be flexible enough to tailor to the actual requirement as risks change to include any previous reported site mishaps and previous surveillance discrepancies.

#### b. CS CRR Checklist.

By completing the CS CRR Checklist, the FS will uncover language in Sections C "Statement of Work," H "Special Contract Requirements," I "Contract Clauses," and J "List of Attachments" in the contract which may influence surveillance. The FS will support the Post Award Orientation Conference as necessary.

#### c. CRR.

- (1) CS surveillance on AE and aircraft contracts is mandatory regardless of risk rating pursuant to:
- (a) Subsection 252.223-7002 of the Defense Federal Acquisition Regulation Supplement (DFARS), which requires contractor compliance in accordance with DoD Manual 4145.26.
- (b) Subsection 252.223-7003 of the DFARS, which requires that contractors desiring to change the place of performance for AE work must notify the contracting officer, usually the procuring contract officer, and receive written approval in advance.
- (c) Subsection 252.228-7001 of the DFARS, which mandates the use of this clause in contracts for aircraft development, production, modification, maintenance, or overhaul.
- (2) Examples of other circumstances where CS must conduct surveillance includes, but are not limited to:

- (a) Contracts that require military aircraft production, modification, maintenance, or overhaul, and contracts that provide for government furnished military aircraft and material, when they contain safety and fire protection requirements.
- (b) Facilities use and lease contracts for the operation or use of government-owned and contractor-operated facilities when they contain industrial safety requirements.
- (c) Contracts that include specific industrial and fire protection requirements primarily directed toward the protection of government property or equipment.

# d. Risk and Frequency.

The frequency of surveillance is based on risk rating, and primarily on the degree of risk, the magnitude of potential government loss associated with the type of work being performed, and the material involved. Elevated risk or unique circumstances may drive more frequent surveillance.

- (1) The FS determines risk ratings during each survey conducted at the contractor's facility by using the Industrial, Explosive, or Aircraft RAM or similar DCMA application. Additional guidance may be found on the resource page of this manual.
  - (2) Risk ratings for CS are identified as high, moderate, or low.
- (3) The FS will accomplish on-site surveillance in accordance with the following frequencies:
- (a) The FS will schedule high risk contractors for four or more surveys each year; the CS Director must approve scheduling less than four surveys.
- (b) The FS will schedule moderate risk contractors for a minimum of two surveys each year.
- (c) The FS will schedule low risk contractors for a minimum of one survey each year.
- (d) The CS Director must approve any reductions to the frequency of surveys at high or moderate risk contractors.
- (4) The CS PDREP Surveillance Plan (SP) Data Entry Job Aid can be utilized for completing the surveillance plan is located on the resource page.

### 5.2. PRIORITIZE SURVEILLANCE.

#### 5.3. DETERMINE TYPE OF SURVEILLANCE.

This paragraph requires no additional details beyond the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01.

#### **5.4. DEVELOP SCHEDULE.**

The following requirements, information, and guidance are in addition to the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01:

#### a. CS Surveillance Plan.

- (1) The CS surveillance plan will lay out the specified frequency of the scheduled surveillance. The surveillance plan becomes the schedule and is detailed enough to identify surveillance frequency from weekly surveillance through annual surveillance.
- (2) The KCRs and other requirements identified in CRR drive the surveillance plan development. Each KCR has multiple associated systems or processes, which are the building blocks of the surveillance plan, are risk-based, and may require several iterations.
- (3) CS surveillance falls in the facility surveillance strategy and the category planned is a process evaluation. The facility surveillance strategy allows one plan to cover multiple contracts at a single location.
- (4) CS surveillance plans are process-level assessments of AE, Aircraft, and Industrial safety program elements. Once a surveillance plan has been developed for the facility, the FS will evaluate new contracts and contract modifications to determine if additional surveillance is necessary. Otherwise, the FS will simply add the contract to the current surveillance plan.

#### b. Documenting the Schedule.

For further guidance on surveillance plan creation, refer to the CS PDREP Surveillance Plan Data Entry Job Aid located on the resource page of this manual.

#### c. Unscheduled Surveillance.

Unscheduled surveillance should be limited. In PDREP, this is termed an 'On Demand' task. Only a supervisor may initiate an 'On Demand' task. All supervisors will request supervisor access for the surveillance plan module in PDREP to support this function.

### 5.5. SURVEILLANCE PLAN MODIFICATIONS.

# 5.6. DELEGATE SURVEILLANCE DECISION.

# **SECTION 6: EXECUTE SURVEILLANCE**

### 6.1. PREPARE FOR SURVEILLANCE.

This paragraph requires no additional details beyond the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01.

#### **6.2. EXECUTE SURVEILLANCE.**

The FS will update the surveillance plan as changes occur or as surveys are completed for each contractor assigned. The supervisor must approve surveillance plans for high-risk contractor sites. The following requirements, information, and guidance are in addition to the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01:

- a. The FS will conduct surveys using the surveillance plan at least once each fiscal year. The FS will adjust survey scheduling to correspond with contract performance periods for intermittent contactors and short-term contracts.
- (1) For surveillance at resident facilities, the resident FS will conduct day-to-day surveillance of their facility to qualify contractor adherence to approved safety procedures. The resident FS will capture day-to-day surveillance at least monthly using PDREP.
- (2) The FS may conduct virtual, or desk, audits under certain, limited circumstances in lieu of an on-site post award survey. The supervisor must approve all scheduled desk audits via email. The FS may conduct:
- (a) AE virtual, or desk, audits at locations where no energetic work is accomplished and the AE clauses are only applicable to the contractors' responsibility of prime control of subcontractors.
- (b) Aircraft virtual, or desk, audits at locations that require limited CS involvement. These locations include operations located on a base, post, camp, station, foreign military installation, which are rated as low risk pursuant to the Aircraft RAM and have been coordinated with and concurred to by the assigned government flight representative for that location.
- 1. The FS may only perform the mid-cycle (i.e., semi-annual) survey or a routine visit as a desk audit.
  - 2. The annual survey must be on-site.
- <u>3</u>. The mid-cycle vs. annual survey distinction is pursuant to Paragraph 10.16.2.2. of DCMA-INST 8210-1D.
  - (c) The FS will not perform virtual, or desk, audits at industrial contractors.
- (d) The CS Director will approve virtual, or desk, audits other than those identified in Paragraphs 6.2.a(2)(a) and 6.2.a(2)(b).

- (e) The FS will not perform virtual, or desk, audits consecutively at the same location.
- (f) The FS will treat virtual, or desk, audits as normal post awards to the maximum extent possible (i.e., they require surveillance planning, RAM, scheduling, preparation, reports).
- b. Preparation for surveys is essential. The FS must ensure contracts are active and contract administrative services authority has been delegated. Prior to conducting a survey, the FS must become familiar with the contractual safety requirements and operational capabilities which may include, but are not limited to:
  - (1) Products, tests, and operations required by contract.
  - (2) Previous safety surveys.
  - (3) Contractor's procedures.
  - (4) Status of follow-up actions and deficiencies corrective action requests (CAR).
  - (5) The status of previously identified safety and occupational health findings.
  - (6) Existing waivers or deviations of CS requirements.
  - (7) Contractor semiannual self–assessment reports.
  - (8) Mishap reports.
  - (9) Facility Data Sheet, if applicable.
  - (10) Explosives Safety Site Plans.
  - (11) RAM.
  - (12) Fire Prevention and Emergency Action Programs.
  - (13) Process Safety Management.
- (14) Administrative contract officer and customer concerns, (e.g., increase in production).
- (15) Status of Government Furnished Material/Government Furnished Equipment. Contact the DCMA Property Manager.
- c. The FS will coordinate site survey visits and make appropriate notifications prior to visit. Include the following as applicable:

- (1) Contractor points of contact.
- (2) Site quality assurance representative.
- (3) Contract management office leadership.
- (4) Administrative contract officer.
- (5) Ground flight representative.
- d. Following supervisor coordination, the FS may warrant a no notice survey when:
- (1) Having difficulty obtaining an acceptable surveillance date due to unresponsiveness from the contractor.
  - (2) Survey results never vary.
- (3) Mishap reports demonstrate that on-site surveys are not resulting in a true evaluation of the contractor's normal operations.
  - (4) Correction of non-compliances are inconsistent.
- (5) The contractor fails to schedule surveys according to when operations are being conducted.

#### 6.3. RESCHEDULE OR CANCEL SURVEILLANCE.

# **SECTION 7: DOCUMENT RESULTS**

#### 7.1. DOCUMENT SURVEILLANCE RESULTS.

The FS must document surveillance results following all surveillance. The following requirements, information, and guidance are in addition to the requirements, information, and guidance in accordance with Volume 1 of DCMA-MAN 2303-01:

- a. Surveillance data entry into PDREP constitutes the official reporting of CS related surveillance. When reporting surveillance results, the FS must include objective evidence of what was witnessed, where it was witnessed, and who was there to support the conclusion and associated risk rating. The FS must report facts that are free of editorial comments or opinions. For example, the FS must not use "in my opinion, in my experience, it appears that, it seems that," as these terms are not based in fact. Examples of factual reporting include samples of operations witnessed, procedures reviewed, hazard analyses reviewed, explosives safety site plan elements, maintenance records, grounding and bonding readings, etc.
- b. FS surveillance consists of process evaluations which typically require multiple individual audit points to look at different parts of the evaluated process. These individual audits are captured in an inspection details record (IDR). Within the IDR, the FS must select a process element that matches any findings the FS needs to report and enter data in accordance with the "CS PDREP Surveillance Plan (SP) Data Entry Job Aid" located on the resource page of this manual.
- c. The FS cannot complete accurate data analysis unless all sample points are recorded, both satisfactory (SAT) and unsatisfactory (UNSAT). Comprehensive data is critical in determining whether there is a systemic process failure or several unrelated occurrences. To determine the difference, the FS must record all surveillance including surveillance with no noted issues. All the mandatory surveillance record data fields from Volume 1 of DCMA-MAN 2303-01 are included in PDREP and described in the CS PDREP Surveillance Plan (SP) Data Entry Job Aid
- d. Surveillance results for CS are covered over several data fields within PDREP. The FS will document free text description of the surveillance in the process element notes within the IDR. The FS will select the process element that matches the desired process finding in the dropdown list and document the IDR result as SAT or UNSAT. For CS, this equates to "Audit Compliant Yes, or No?" The overall process evaluation receives a record result of SAT or UNSAT. For CS, this equates to "Process Compliant Yes, or No?" If no, the FS will issue a CAR in accordance with DCMA-MAN 2303-05, "Addressing Contractor Non-compliances and Corrective Action Requests." In accordance with contractual requirements, not every noncompliance requires a formal CAR. Therefore, an UNSAT process element does not drive an UNSAT IDR nor does an UNSAT IDR drive an UNSAT record. However, if the noted noncompliance requires a CAR, the expectation is that the process evaluation is UNSAT, and the FS will document on the record.

# 7.2. MULTIFUNCTIONAL COMMUNICATION AND REPORTING.

# **SECTION 8: DATA COLLECTION AND ANALYSIS**

# **SECTION 9: EVALUATE SURVEILLANCE PLAN**

# **GLOSSARY**

# G.1. ABBREVIATIONS AND ACRONYMS.

ACRONYM	MEANING
AE AO	Ammunition/Explosives aircraft operations
CAR CRR CS	corrective action request contract receipt and review contract safety
DCMA-INST DCMA-MAN DFARS	DCMA Instruction DCMA Manual Defense Federal Acquisition Regulation Supplement
FS	functional specialist
IDR	inspection details record
KCR	key contract requirement
PDREP	Product Data Reporting and Evaluation Program
RAM	Risk Assessment Matrix
SAT	satisfactory
UNSAT	unsatisfactory

# **GLOSSARY**

### **G.2. DEFINITIONS.**

Unless otherwise noted, these terms and their definitions are for the purpose of this issuance.

TERM MEANING

**program manager** CS utilizes program managers instead of

functional directors, deputies, or group leaders. The program manager is the subject matter expert and primary point of contact responsible for a specific program (i.e., AE, AO, CS operations) within CS. The program manager develops, implements, and manages program activities, serving as the central point of communication and coordination for all related matters in accordance with DCMA

MAN 2301-07.

# REFERENCES

DCMA Instruction 8210-1B, "Contractor's Flight and Ground Operations," March 1, 2007

DCMA Instruction 8210-1C, "Contractor's Flight and Ground Operations," August 21, 2013

DCMA Instruction 8210-1D, "Contractor's Flight and Ground Operations," February 6, 2023

DCMA Manual 2301-07, "Contract Safety," August 4, 2022

DCMA Manual 2303-01, Volume 1, "Surveillance," June 9, 2025

DCMA Manual 2303-01, Volume 2, "Surveillance: Aircraft Operations," June 9, 2025

DCMA Manual 2303-05, "Addressing Contractor Noncompliances and Corrective Action Requests," June 9, 2025

DCMA Manual 4502-02, "Workload Acceptance," September 15, 2021

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DoD Directive 5105.64, "Defense Contract Management Agency (DCMA)" January 10, 2013, as amended

DoD Manual 4145.26, "DOD Contractor's Safety Manual for Ammunition and Explosives," March 13, 2008, as amended

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