



ACQUISITION  
AND SUSTAINMENT

THE UNDER SECRETARY OF DEFENSE  
3010 DEFENSE PENTAGON  
WASHINGTON, DC 20301-3010

AUG 02 2020

MEMORANDUM FOR: SEE DISTRIBUTION

SUBJECT: Exception to Policy – Waiver of Requirement for Completion of 24 Semester Credit Hours in Specified Courses of Study as a Qualification Requirement for Contracting Positions

References: (a) Section 1724 of title 10, United States Code  
(b) Federal Register Notice (FRN), Vol. 85, No. 109 (85 FR 34527), 5 June 2020

Section 861(b) of the National Defense Authorization Act for Fiscal Year 2020 (Public Law 116-92) amended section 1724 of title 10, United States Code, to remove the statutory requirement for contracting professionals to complete at least 24 semester credit hours (or equivalent) of study from an accredited institution of higher education in the areas of accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, and organization, and management. The Defense Federal Acquisition Regulations Supplement has been revised to remove this qualification requirement as well.

Effective immediately, an exception to paragraph 5.4, of Department of Defense Instruction (DoDI) 5000.66, “Defense Acquisition Workforce, Education, Training, Experience, and Career Development Program,” 27 July 2017, Change 2, September 13, 2019, is granted to permit hiring of contracting professionals who have not completed at least 24 semester credit hours (or equivalent) of study from an accredited institution of higher education in business-related courses, but who are otherwise qualified. The specific policy exceptions are detailed in the attachment. In addition, paragraph 3.3.b. of the “Defense Acquisition Workforce Program Desk Guide,” 20 July 2017, is temporarily suspended in its entirety. These exceptions are valid for one year, or until the regulations are updated, whichever occurs first.

My point of contact is: Dr. Gina Eckles, Senior Human Capital Manager, at (703) 805-5420 or [gina.eckles@hci.mil](mailto:gina.eckles@hci.mil).

Ellen M. Lord

Attachment:  
As stated

Received: SGS  
4 Aug 20 (AAB)

**DISTRIBUTION:**

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## Attachment

### Exception to Policy – Waiver of Requirement for Completion of 24 Semester Credit Hours in Specified Courses of Study as a Qualification Requirement for Contracting Positions

Table 3 in paragraph 5.4 of DoDI 5000.66, “Defense Acquisition Workforce, Education, Training, Experience, and Career Development Program,” 27 July 2017, Change 2, September 13, 2019, is temporarily revised as follows (see strike through):

**Table 3: Contracting Position-specific Requirements**

Position	Unique Position Requirements
Contracting Officers (civilian occupational series 1102 positions), military equivalent positions, and members of the Contingency Contracting Force (CCF).	<ul style="list-style-type: none"> <li>● A baccalaureate degree from an accredited academic institution.</li> </ul> <p>This requirement does not apply* to a DoD civilian employee or Service member who:</p> <ul style="list-style-type: none"> <li>- Served as a contracting officer with authority to award or administer contracts in excess of the SAT on or before September 30, 2000.</li> <li>- Served in an 1102 position or as a Service member in a similar occupational specialty on or before September 30, 2000.</li> <li>- Is an enlisted member of the CCF. This exemption only applies to CCF members in their current or future CCF positions. The baccalaureate degree exemption <b>does not</b> apply to current CCF members seeking employment within DoD as an 1102.</li> </ul> <p>*This exception does not apply to new hires into an 1102 position.</p>
CCF positions within DoD Components that consist of members of the Armed Forces performing contracting functions, whose mission is to deploy for contingency and other operations in order to provide necessary contracting support (see Notes 1 and 2).	<p><del>● At least 24 semester credit hours in business disciplines. Business disciplines include: accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, or organization and management. The 24 semester credit hours (or the equivalent) must be earned from an accredited academic institution of higher education. — For CCF membership, passing of an examination that demonstrates skills, knowledge, or abilities comparable to an individual who has completed at least 24 semester hours in the business disciplines is an acceptable substitute to the above requirement.</del></p>
Contracting officers who award or administer contracts above the SAT (see Note 3).	<ul style="list-style-type: none"> <li>● Complete all contracting courses required for the acquisition career field certification level of the position.</li> <li>● 2 years of experience in a contracting position.</li> <li>● 1102 education requirements for a degree <del>and 24 semester hours of business-related courses.</del></li> <li>● Any additional requirements established, based on the</li> </ul>

	<p>dollar value and complexity of the contracts awarded or administered in the position.</p> <ul style="list-style-type: none"> <li>● Exceptions to education requirements: same as those for Civilian 1102 (and equivalent military positions).</li> </ul>
Senior Contracting Official. (This is a KLP.)	<ul style="list-style-type: none"> <li>● 1102 education requirements for a degree <del>and 24 semester hours</del>.</li> <li>● 4 years of experience in contracting.</li> <li>● Tenure period: Milestone closest to 3 years, or as tailored by CAE based on unique program requirements.</li> </ul>
<p>Note 1: Requirement for college degree <del>and 24 semester credit hours of business-related courses</del> applies to those employees who initially met the exception criteria but who subsequently had a break in service and desire re-entry into the 1102 career field.</p> <p>Note 2: Each of the Military Departments will establish a minimum amount of experience or training required for each CCF member before a deployment. The minimum training should include training in Government contracting principles, simplified acquisition procedures, contingency contracting, and Government purchase card, as appropriate.</p> <p>Note 3: Each of the Military Departments will establish minimum training and experience requirements for CCF members before issuing them a warrant at or below the SAT. CCF members appointed as contracting officers with authority to award or administer contracts above the SAT will meet the qualification requirements identified in this section for contracting officers above the SAT, with the exception of a college degree <del>and 24 semester credit hours of business-related courses</del>.</p>	

**DOD QUALIFICATION STANDARD FOR GS-1102  
CONTRACTING POSITIONS**

This is an individual, single agency qualification standard for Department of Defense positions. This standard implements requirements contained in Title 10, United States Code, Sections 1723 through 1733, as amended by Section 861(b) of the National Defense Authorization Act for Fiscal Year 2020 (Public Law 116-92) and implemented on a policy exception basis by Under Secretary of Defense for Acquisition and Sustainment memorandum, Exception to 24 Semester Hours Requirement for Contracting Positions, effective and dated August 2, 2020.

**Basic Education Requirements for GS-5 through GS-15 (or equivalent) positions:**

A bachelor’s degree from an accredited educational institution authorized to grant baccalaureate degrees.

*NOTE: The education requirements listed above apply only to individuals entering DoD GS-1102 positions on or after October 1, 2000. Current civilian personnel in DoD who occupied GS-1102 positions or contracting positions with authority to award or administer contracts above the simplified acquisition threshold in an Executive Department on or before September 30, 2000 are exempt from meeting this requirement. Current military members who occupied a similar occupational specialty to the GS (or equivalent)-1102 or before September 30, 2000 are also exempt from meeting this requirement.*

**Additional Experience and/or Education Requirements for GS-7 and above:**

<b>GRADE (or equivalent)</b>	<b>EDUCATION</b>	<b>OR</b>	<b>SPECIALIZED EXPERIENCE</b>
<b>GS-7</b>	1 full academic year of graduate education, law school, <i>or</i> superior academic achievement		One year equivalent to at least GS-5
<b>GS-9</b>	2 full academic years of progressively higher level graduate education <i>or</i> master’s or equivalent graduate degree or LL.B. or J.D.		One year equivalent to at least the GS-7
<b>GS-11</b>	3 full academic years of progressively higher level graduate <i>or</i> Ph.D. or equivalent doctoral degree		One year equivalent to at least the GS-9
<b>GS-12 thru GS-15</b>	(no educational equivalent)		One year equivalent to at least next lower grade level

**Specialized Experience:** In addition to meeting the basic education requirements above, one year of specialized experience equivalent to the next lower grade level in the normal line of progression is qualifying for positions at grades GS-7 (or equivalent) and above. Specialized experience must have equipped the applicant with the particular knowledge, skills, and abilities to perform successfully the duties of the position to be filled.

**Basic Qualification Requirements for Contracting Officer Positions:** In addition to meeting the basic educational requirement as well as the requirements in the table above, applicants must have:

- 1) have at least two years of experience in contracting positions; and
- 2) have completed all contracting courses required for a contracting officer for positions at the level and grade at which the person is serving. Certification at this level is sufficient to meet this standard.

**Basic Requirements for Critical Acquisition Positions:** The Secretary of Defense shall designate the acquisition positions in the Department of Defense that are critical acquisition positions, applicants must:

- 1) be eligible for GS-14, or equivalent; and
- 2) hold a bachelor's degree; and
- 3) have completed all mandatory training requirements for Level II or III certification as prescribed by the head of the agency for progression to higher level contracting positions; and
- 4) possess four years of acquisition experience. At least 1 year of that experience must have been specialized experience at or equivalent to work at the next lower grade level of the position, and must have provided the knowledge, skills, and abilities to perform successfully the work of the position.

**Basic Qualification Requirements for Senior Contracting Officials:** A Senior Contracting Official is a position such as a director of contracting, or a principal deputy to a director of contracting, serving in the Office of the Secretary of Defense, the Office of the Secretary of a Military Department, the Headquarters (HQ) of a Military Department, the HQ of a Defense Agency, a subordinate command HQ, or a major systems or logistics contracting activity in the Department of Defense. Before a person may be assigned to a critical acquisition position as a senior contracting official, the person must have at least four years' experience in contracting.

**Waivers:** *With the exception of Specialized Experience*, the component acquisition career management authority may waive any or all of the requirements listed in this qualifications standard with respect to any *employee* of the Department of Defense if the board certifies that the individual possesses significant potential for advancement to levels of greater responsibility and authority, based on demonstrated job performance and qualifying experience.

**Contracting Series, 1102  
Implementation Guidance/Questions and Answers**

**FY 2020 National Defense Authorization Act (Public Law 116-92)  
Section 861(b) Elimination of 24 Semester Credit Hours in 10 U.S.C. 1724  
&**

**USD(A&S) Policy Exception Memorandum dated 02 August 2020**

**A. What has changed?**

The FY 2020 National Defense Authorization Act amended law to eliminate the requirement at 10 U.S.C. 1724 for 24 semester credit hours of courses in business disciplines for categories of contracting personnel. The Under Secretary of Defense for Acquisition & Sustainment (US(A&S), the Honorable Ellen Lord, authorized an exception to the corresponding policy requirement in DoD Instruction (DoDI) 5000.66, Defense Acquisition Workforce Education, Training, Experience, and Career Development Program, 27 July 2017, Change 2, 13 September 2019. The deletion of the requirement in law and the policy exception applies to contracting officers, employees or potential employees in the General Schedule (or other DoD pay and compensation system) 1102 occupational series<sup>1</sup> or similar military systems, contracting developmental opportunities, and the Contingency Contracting Force.

**FY 2020 National Defense Authorization Act.** Section 861(b) of the National Defense Authorization Act for Fiscal Year 2020 (Public Law 116-92) amended section 1724 of title 10, United States Code, to remove the statutory requirement for contracting professionals to complete at least 24 semester credit hours (or equivalent) of study from an accredited institution of higher education in the areas of accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, and organization, and management. The Defense Federal Acquisition Regulations Supplement (DFARS) was also revised to remove this requirement DFARS 201.603-2(1)(iii)(B) and 218.201(1) (reference DFARS Case 2020-D012).

**USD(A&S) Policy Exception Memo.** On 2 August 2020 the USD(A&S) authorized exceptions (memo attached) to the policy requirement in DoDI 5000.66, paragraph 5.4., Unique Requirements for Contracting Positions. The USD(A&S) memorandum includes an attachment with applicable excerpts of DoDI 5000.66 paragraph 5.4, Table 3, Contracting Position-specific Requirements, with line-out changes identifying the exceptions. In addition, paragraph 3.3.b. of the “Defense Acquisition Workforce Program Desk Guide,” 20 July 2017, is temporarily suspended in its entirety. The USD(A&S) exceptions are valid for one year, or until the regulations are updated, whichever occurs first.

**B. Questions and Answers.** The following Questions and Answers are provided to help understand the changes with regard only to the removal of the requirement for the 24 semester

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<sup>1</sup> For the purposes of this Paper, Contracting Officers and employees or potential employees in the General Schedule- (or other DoD pay and compensation system) 1102 occupational series are collectively referred to as 1102s.

credit hours which was established and effective October 1, 2000. Except for the changes above, personnel applicability exclusions to the requirements established in 2000 by law and policy still apply.

**1. What has changed?**

**A.** The FY 2020 National Defense Authorization Act amended law to eliminate the requirement at 10 U.S.C. 1724 for 24 semester credit hours of courses in business disciplines for categories of contracting personnel. The Under Secretary of Defense for Acquisition & Sustainment (US(A&S)), by memorandum 2 August 2020, authorized an exception to the corresponding policy requirement in DoD Instruction (DoDI) 5000.66, Defense Acquisition Workforce Education, Training, Experience, and Career Development Program, 27 July 2017, Change 2, 13 September 2019. The deletion of the requirement in law and the policy exception applies to contracting officers, employees or potential employees in the General Schedule- (or other DoD pay and compensation system) 1102 occupational series or similar military systems, contracting developmental opportunities, and the Contingency Contracting Force.

**2. Will the Contracting Qualification Standard be updated?**

**A. Yes.** The DoD Contracting Qualification Standard has been updated and is attached.

**3. Will Position Descriptions (or equivalent) for 1102s need to be updated?**

**A.** As 1102 vacancies occur, the Positions Description should be updated to reflect the revised education requirement. Position Descriptions for filled positions do not need to be revised until a vacancy occurs.

**4. Will Contracting acquisition certification workforce standards be updated?**

**A. Yes.** The acquisition workforce certification standards are officially documented in the Defense Acquisition University iCatalog at <https://icatalog.dau.edu/>.

**5. Does the statutory and policy requirement for a baccalaureate degree for 1102s and similar military positions still exist?**

**A. Yes.** The requirement established at 10 U.S.C. 1724 and in DoDI 5000.66, paragraph 5.4, for a baccalaureate degree from an accredited educational institution still exists.

**6. Does the 2 August 2020 USD(A&S) memorandum affect job offer announcements for 1102s?**

**A. Yes.** The 24 semester credit hour qualification requirement must be eliminated from all job offer announcements posted 2 August 2020 forward. Job offer announcements posted before 02 August 2020 that have not closed should be revised to remove the 24 hour qualification requirement. Job offer announcements posted before 2 August 2020 that have closed and in which HR has not issued the certificate of eligible applicants should be revised to remove the requirement.

**7. Does the memorandum affect DoD 1102 job offers issued before 02 August 2020?**

**A. No.** Any job offer for a DoD 1102 position issued before 02 August 2020 is not affected.

**8. Does the memorandum affect DoD 1102 certificates of eligibility referral lists issued before 02 August 2020?**



**A. No.** If a certificate of eligibility list for a DoD 1102 was issued before 02 August 2020, but a selection has not been made, the hiring organization may proceed with the selection process or modify and reissue the announcement. If a selection has been made, the hiring organization should complete the hiring action.

**9. What is the definition of “New Entrant” in consideration of the revised requirements?**

**A. No change.** Title 10 U.S.C. 1724 requirements and the implementing 2 August 2020 USD(A&S) memorandum apply still only to individuals *entering* DoD on or after October 1, 2000. Civilian personnel in DoD, who occupied GS-1102 positions or contracting officer positions with authority to award or administer contracts above the simplified acquisition threshold on or before September 30, 2000, are therefore excluded from the revised requirements as it applies to civilian positions as long as there has not been a break in service. Military personnel who occupied positions with occupational specialties similar to the GS-1102 series or contracting officer positions with authority to award or administer contracts above the simplified acquisition threshold on or before September 30, 2000, are also therefore excluded from the revised requirement as it applies to military positions.

**DoD Priority Placement Program (PPP)**

**10. What affect does the revised qualification requirements of 10 U.S.C. § 1724 and the 02 Aug 2020 USD(A&S) memorandum have on employees registering in the DoD Priority Placement Program?**

**A. None.** The section 861(b) amendments to 10 U.S.C. § 1724 do not require any changes to the already existing procedures for PPP registration and placement.