ENERGY, INSTALLATIONS AND ENVIRONMENT

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

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OCT 13 2016

MEMORANDUM FOR DEPUTY ASSISTANT SECRETARY OF THE ARMY

(ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH)

DEPUTY ASSISTANT SECRETARY OF THE NAVY

(ENVIRONMENT)

DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE

(ENVIRONMENT, SAFETY AND INFRASTRUCTURE)

STAFF DIRECTOR, DEFENSE LOGISTICS AGENCY (DES-E)

SUBJECT: Revisions to the Knowledge-Based Corporate Reporting System Data Templates and Data Validations

High quality Defense Environmental Restoration Program data are important to ensure the information we use to support our internal and external reporting requirements is accurate and complete. In addition, high quality performance and financial information is necessary to fulfill our program analysis and oversight responsibilities.

To that end, the Knowledge-Based Corporate Reporting System (KBCRS) Subcommittee, which includes representatives from your offices, continually reviews data fields and reporting requirements. The purpose of this review is to identify data elements that are no longer required or that need clarification and to propose new data elements when necessary. The Attachment contains the list of KBCRS changes the Subcommittee agreed to during its recent review, and the timeline for making the changes in the data templates. The attachment also includes updated and new validations that check for data accuracy and completeness. These changes support streamlining and improving data reporting and interpretation.

We all benefit from the increased consistency and transparency of our data reporting. I want to thank your staff for their hard work over the past several months to continue to improve our data quality. My point of contact is Ms. Alex Long, at (703) 571-9061 or alexandria.d.long.civ@mail.mil.

Maureen Sullivan

Deputy Assistant Secretary of Defense (Environment, Safety and Occupational Health)

Attachment: As stated

Knowledge-Based Corporate Reporting System (KBCRS) Data Validations/Reporting Guidance

#	Data Validation/Reporting Guidance	Rule Type and Implementation Date
1	Report Cost Recovery/Cost Sharing data in the KBCRS-Cleanup module (instead of the KBCRS-Non Site-Level Information Collection System (NSLICS) module).	The end of FY2016
2	Report secondary National Priorities List (NPL) status for installations and properties on the NPL where DoD is not the lead for cleanup.	The end of FY2016
3	Do not delete sites from the inventory.	Hard rule for the end of FY2016
4	Do not add a new site to the inventory if it meets all three of these criteria: the site achieved response complete (RC) before Fiscal Year (FY) 2009, it has no long-term management (LTM) requirements, and it has no future funding requirements.	Hard rule for the end of FY2016
5	Report the county for each installation and property with Defense Environmental Restoration Program sites in the Installation (INST), Installation Location (INST_LOC), and Munitions Response Area Location (MRA_LOC) tables.	Hard rule for the end of FY2016
6	Report the county for each site in the Site (ENV_REST_SITE) and Site Location (ENVST_LOC) tables.	Hard rule for the end of FY2016
7	Report a Munitions Response Site Prioritization Protocol (MRSPP) score (mrspp_priority_cd), and Chemical Warfare Materiel Hazard Evaluation (mrspp_che_cd), Explosive Hazard Evaluation (mrspp_ehe_cd), and Health Hazard Evaluation (mrspp_hhe_cd) module scores, for each munitions response site (MRS).	Hard rule for the end of FY2016
8	Report a record in the Cleanup Driver table (ENVST_CLEANUP_DRVR) for each site in the inventory.	Hard rule for the end of FY2016
	Ensure that the NPL status codes reported in the Installation and Site tables are consistent; the following inconsistencies are issues: • The site flag is "Y" but the installation flag is not "Y" • The site flag is "P" but the installation flag is not "P" • The site flag is "D" but the installation flag is not "Y" or "D"	Hard rule for the end of
9	• The installation flag is "N" but the site flag is not "N"	FY2016
10	Ensure that the Base Realignment and Closure (BRAC) round codes reported in the Installation and Site tables are consistent (e.g., if a site is a BRAC III site, either the primary or secondary BRAC round in the Installation table should be "III").	Hard rule for the end of FY2016
11	Ensure that the BRAC round codes reported in the funding tables (i.e., ENVST_FND, CTC_CHG) are consistent with the BRAC round codes reported in the Site table.	Hard rule for the end of FY2016
12	Ensure that a site's remedy in place (RIP) date is not later than the RC date. ¹	Hard rule for the end of FY2016
	Ensure sites that have an overall MRSPP priority of 2 through 8 (or 3 through 8 if no MRSs have an overall priority of 1), that have completed the site inspection (SI) phase, and that have not achieved RC have an entry in the mrspp_sequence_cd field if the remedial investigation/feasibility study (RI/FS), remedial design (RD), remedial action	
	construction (RA-C), or remedial action operation (RA-O) phase is complete or underway. ²	
13	Additional clarification: If all MRSs with an overall priority of 1 have an RI/FS, RD, RA-C, or RA-O phase complete or underway, an entry in the mrspp_sequence_cd field would not be needed for MRSs with an overall priority of 2, but it would be needed for MRSs with an overall priority of 3 through 8 if any of the MRSs with an overall priority of 2 do not have an RI/FS, RD, RA-C, or RA-O phase complete or underway.	Hard rule for the end of FY2016
14	Do not report multiple records for a phase where the start dates are the same and the completion dates are the same (except the interim remedial action (IRA) phase).	Hard rule for the end of FY2016
15	Report a start date (estimated or actual) and a completion date (estimated or actual) for each phase.	Hard rule for the end of FY2016
16	Do not report both estimated and actual start dates and/or completion dates for a phase.	Hard rule for the end of FY2016
17	Ensure that phase dates are valid (i.e., the month is between 01 and 12).	Hard rule for the end of FY2016
18	Ensure that the duration of phases flagged indefinite (where rmdyactn_indef_cd is "Y") is 30 years +/- 4 years.	Hard rule for the end of FY2016
19	Ensure that the "Natural Attenuation" remedy is not associated with the LTM phase. ¹	Hard rule for the end of FY2016
20	If a site has not achieved RC, ensure the LTM phase is not complete or underway. ^{3, 4}	Soft rule for the end of FY2016; will stay a soft rule

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	Deta Velidation/Deposition Cuidance	Rule Type and
#	Data Validation/Reporting Guidance	Implementation Date
		Soft rule for the end of
	Ensure that the NPL status reported in the Installation table remains consistent from year to year (unless a change is needed to reflect an update to the U.S. Environmental	FY2016; will stay a soft
21	Protection Agency's NPL).	rule
		Soft rule for the end of
	Ensure that the RC dates for sites with an alternate MRSPP rating of "11" (no known or suspected hazard) in the mrspp_priority_cd field are no more than one year beyond	FY2016; will stay a soft
22	the current reporting year (e.g., in the end of FY2015 submittal, the RC dates for sites with a rating of 11 should be in FY2016 or earlier).	rule
		Soft rule for the end of
		FY2016; hard rule for
23	Report the NPL list date (npl_list_fydt) in the Installation table for each installation and property proposed for the NPL, on the NPL, and deleted from the NPL.	the end of FY2017
	(-F	Soft rule for the end of
	Report congressional districts for each site where there is not a one-to-one relationship between the county and congressional district in the Site table and, where applicable,	FY2016: hard rule for
24	in the Site Location table.	the end of FY2017
21	III the die Eddhor date.	Soft rule for the end of
	For each installation and property on the NPL or deleted from the NPL, report the type of agreement (i.e., Federal Facility Agreement (FFA), Interagency Agreement (IAG)),	FY2016; hard rule for
25		the end of FY2017
25	signature date, and amendment date (where applicable).	Soft rule for the end of
00		FY2016; hard rule for
26	Do not report the "Unknown" site type for any sites in the inventory.	the end of FY2017
		Soft rule for the end of
San San S		FY2016; hard rule for
27	Report an estimated or actual site closeout date for each site in the inventory.	the end of FY2017
		Soft rule for the end of
28	Report latitude and longitude (geoloc_lat_cn and geoloc_long_cn) for each Installation Restoration Program site that has not achieved RC and for all MRSs.	FY2016; hard rule TBD
	Ensure there is no future funding for a phase two or more years after the phase is scheduled to be complete; or was completed, where the completion date is in the current	Soft rule for the end of
29	reporting FY (e.g., if a phase is scheduled to end in FY2016, there should not be funding for the phase after FY2017). ⁵	FY2016; hard rule TBD
	Ensure there is no future funding for a phase that was completed prior to the current reporting FY (e.g., there should not be future funding in the end of FY2015 KBCRS	Soft rule for the end of
30	submission for a phase that was completed before FY2015).	FY2016; hard rule TBD
	Ensure there is no future funding for a phase that is not part of the site schedule (e.g., if the RA-O phase is not part of the cleanup strategy at a site, there should not be	Soft rule for the end of
31	future funding for the RA-O phase).	FY2016; hard rule TBD
	Ensure there is no future funding for a phase more than three years before the phase is scheduled to begin (e.g., if a phase is scheduled to begin in FY2020, there should	Soft rule for the end of
32	not be funding for the phase before FY2017).	FY2016; hard rule TBD
		Soft rule for the end of
33	Ensure there are no obligations for a phase that is not part of the site schedule.	FY2016; hard rule TBD
	Ensure there are no obligations for a phase that ended two years or more before the current submission, or that is scheduled to begin two years or more after the current	
	submission (e.g., for the end of FY2015 submission, there should not be FY2015 obligations (including prior year funds and land sale revenue) for a phase that ended in	Soft rule for the end of
34	FY2013 or earlier or that is scheduled to begin in FY2017 or later).	FY2016; hard rule TBD
	. The second of that is considered to beginning the second of the second	Soft rule for the end of
35	Ensure the IRA phase is not scheduled to end after a site achieves RC. ¹	FY2016; hard rule TBD
- 00	Ensure the five phase is not sometimed to end after a site defineves No.	Soft rule for the end of
36	If a site has not achieved RIP, ensure the RA-O phase is not complete or underway. ^{3, 6, 7}	FY2016; hard rule TBD
30	in a site has not achieved the, ensure the total phase is not complete or underway.	Soft rule for the end of
37	If a site has achieved BC ensure the BA O phase is not underway or planned	
31	If a site has achieved RC, ensure the RA-O phase is not underway or planned.	FY2016; hard rule TBD
20	Ensure the BA O shape is not cohecular to and often a site policy on DC 1	Soft rule for the end of
38	Ensure the RA-O phase is not scheduled to end after a site achieves RC. ¹	FY2016; hard rule TBD
00	1.8	Soft rule for the end of
39	Ensure there is no more than two years between the RIP and RC dates for a site that does not have an RA-O phase. 1, 8	FY2016; hard rule TBD
	- 10 M	Soft rule for the end of
40	Ensure there is no more than two years between the end of the RA-O phase and the RC date. 1, 6, 8	FY2016; hard rule TBD

Knowledge-Based Corporate Reporting System (KBCRS) Data Validations/Reporting Guidance

#	Data Validation/Reporting Guidance	Rule Type and
and the second	Ensure there is no more than three years between the end of a pre-RIP (i.e., preliminary assessment (PA), SI, RI/FS, RD, RA-C) or IRA phase and RIP, or between RIP and	Implementation Date Soft rule for the end of
41	the start of the RA-O phase. 1,8	FY2016; hard rule TBD
		Soft rule for the end of
42	Ensure the LTM phase is not scheduled to begin more than one year before a site achieves RC.3	FY2016; hard rule TBD
		Soft rule for the end of
43	Ensure there is not a gap of ten or more years between the RC date and the start of the LTM phase.1	FY2016; hard rule TBD
	Ensure there are phases associated with a site that has been in the inventory for at least one year (e.g., if a site was first reported in FY2014, there should be a phase	Soft rule for the end of
44	schedule for the site in the end of FY2015 KBCRS submission).	FY2016; hard rule TBD
		Soft rule for the end of
45	Ensure all IRA phases and final remedial action phases that are underway have a remedy associated with them.	FY2016; hard rule TBD
	Do not report an estimated record of decision (ROD)/decision document (DD) date (envst_est_dd_ymdt) for sites where the RD, RA-C, RA-O, LTM, and/or project closeout	Soft rule for the end of
46	phases are complete or underway, and/or where the RIP and RC dates are actual dates. ³	FY2016; hard rule TBD
		Soft rule for the end of
47	Report an actual ROD/DD date (envst_dd_ymdt) for each site where the RD, RA-C, and/or RA-O phases are underway.	FY2016; hard rule TBD
	Do not report an actual ROD/DD date (envst_dd_ymdt) for sites where the PA, SI, RI/FS, engineering evaluation/cost estimate (EE/CA), or IRA phase is underway or	Soft rule for the end of
48	planned. ³	FY2016; hard rule TBD
		Hard rule for the end of
49	Report a site type for every site in the inventory (i.e., do not leave the field blank).	FY2017
50	Certify in NSLICS that the MRS map upload is complete.	Hard rule TBD

¹ Excludes sites where the phase(s) in question is complete and/or the milestone(s) in question has been achieved.

Note: A soft rule means that means that the DoD Components will not have to fix the errors before their data are loaded into KBCRS, but they will need to provide a reason for not fixing the errors. A hard rule means that the DoD Components will have to fix the errors before their data are loaded into KBCRS.

² Excludes sites where the DoD Component cannot obtain rights of entry.

³ Excludes multi-media sites.

⁴ This scenario is only acceptable if: the DoD Component started LTM before December 2013; the DoD Component reopened a site, a pre-RIP and/or IRA phase(s) is underway or planned, and the original LTM phase is complete; or LTM is underway and it started no more than one year before the site is projected to achieve RC.

⁵ Excludes Navy BRAC sites.

⁶ Excludes sites where the RA-O phase is complete and a pre-RIP and/or IRA phase(s) is underway or planned, or where the original RA-O phase is complete and an additional RA-O phase is underway or planned.

⁷ Excludes sites flagged performance-based contract sites.

⁸ Excludes potentially responsible party sites that have a project negotiation phase associated with them.