



ENERGY,
INSTALLATIONS
AND ENVIRONMENT

OFFICE OF THE ASSISTANT SECRETARY OF DEFENSE

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WASHINGTON, DC 20301-3400

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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 Reporting Instructions and Data Validations; Guidance on Reporting Transferred Sites; and Guidance on Reporting Re-dated Sites

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. During these reviews the Subcommittee identifies data elements that are no longer required or that need clarification and proposes new data elements when necessary. Attachment 1 contains an updated list of KBCRS changes and data validations that check for accuracy and completeness. This attachment also includes the Subcommittee's agreed upon timeline for making the changes to KBCRS. These changes support streamlining and improving data reporting and interpretation.

Attachment 2 is guidance on reporting sites that a DoD Component transfers, along with the remaining liability, to a non-DoD federal agency, and guidance on reporting sites that transfer between DoD Components and between the active and Base Realignment and Closure programs. Additionally, Attachment 3 contains guidance on how to report sites with a re-dated response complete date in KBCRS. The guidance in Attachments 2 and 3 is effective immediately.

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)

Attachments:
As stated

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

Original # ¹	New # ²	Data Validation/Reporting Guidance	Rule Type and Implementation Date ³
1	1	Report Cost Recovery/Cost Sharing data in the KBCRS-Cleanup module (instead of the KBCRS-Non Site-Level Information Collection System (NSLICS) module).	Hard rule implemented for the end of Fiscal Year (FY) 2016
2	2	Report secondary National Priorities List (NPL) status for installations and properties on the NPL where DoD is not the lead for cleanup.	Hard rule implemented for the end of FY2016
3	3	Do not delete sites from the inventory.	Hard rule implemented for the end of FY2016
4	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 implemented for the end of FY2016
5	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 implemented for the end of FY2016
6	6	Report the county for each site in the Site (ENV_REST_SITE) and Site Location (ENVST_LOC) tables.	Hard rule implemented for the end of FY2016
7	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 implemented for the end of FY2016
8	8	Report a record in the Cleanup Driver table (ENVST_CLEANUP_DRVR) for each site in the inventory.	Hard rule implemented for the end of FY2016
9	9	Ensure that the NPL status codes reported in the Installation and Site tables are consistent; the following inconsistencies are issues: <ul style="list-style-type: none"> • The site flag is "Y" but the installation flag is not "Y" • The site flag is "P" but the installation flag is not "P" or "Y" • The site flag is "D" but the installation flag is not "Y" or "D" • The installation flag is "N" but the site flag is not "N" 	Hard rule implemented for the end of FY2016
10	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 implemented for the end of FY2016
11	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 implemented for the end of FY2016
12	12	Ensure that a site's remedy in place (RIP) date is not later than the RC date. ⁴	Hard rule implemented for the end of FY2016

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

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13	13	<p>Ensure sites that have an overall MRSP 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.⁵</p> <p>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.</p>	Hard rule implemented for the end of FY2016
14	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 implemented for the end of FY2016
15	15	Report a start date (estimated or actual) and a completion date (estimated or actual) for each phase.	Hard rule implemented for the end of FY2016
16	16	Do not report both estimated and actual start dates and/or completion dates for a phase.	Hard rule implemented for the end of FY2016
17	17	Ensure that phase dates are valid (i.e., the month is between 01 and 12).	Hard rule implemented for the end of FY2016
18	18	Ensure that the duration of phases flagged indefinite (where rmdyactn_indef_cd is "Y") is 30 years +/- 4 years.	Hard rule implemented for the end of FY2016
19	19	Ensure that the "Natural Attenuation" remedy is not associated with the LTM phase. ⁴	Hard rule implemented for the end of FY2016
20	20	If a site has not achieved RC, ensure the LTM phase is not complete or underway. ^{6 7 8}	Soft rule implemented for the end of FY2016; will stay a soft rule
21	21	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 Protection Agency's NPL).	Soft rule implemented for the end of FY2016; will stay a soft rule
22	22	Ensure that the RC dates for sites with an alternate MRSP rating of "11" (no known or suspected hazard) in the mrspp_priority_cd field are no more than one year beyond 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).	Soft rule implemented for the end of FY2016; will stay a soft rule
23	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.	Soft rule implemented for the end of FY2016; hard rule for the end of FY2017
25	24	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)), signature date, and amendment date (where applicable).	Soft rule implemented for the end of FY2016; hard rule for the end of FY2017
26	25	Do not report the "Unknown" site type for sites that have an RC date in FY2012 or later.	Soft rule implemented for the end of FY2016; hard rule for the end of FY2017

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31	26	Ensure there is no future funding for a phase that is not part of the site schedule (e.g., if there is no RA-O phase reported for a site in the PHASES table, do not report future funding for the RA-O phase in the ENVST_FND table).	Soft rule implemented for the end of FY2016; hard rule for the end of FY2017
33	27	Ensure there are no obligations for a phase that is not part of the site schedule (e.g., if there is no RA-O phase reported for a site in the PHASES table, do not report obligations for the RA-O phase in the ENVST_FND table).	Soft rule implemented for the end of FY2016; hard rule for the end of FY2017
35	28	Ensure the IRA phase is not scheduled to end after a site achieves RC. ⁴	Soft rule implemented for the end of FY2016; hard rule for the end of FY2017
37	29	If a site has achieved RC, ensure the RA-O phase is not underway or planned.	Soft rule implemented for the end of FY2016; hard rule for the end of FY2017
45	30	Ensure all IRA phases and final remedial action phases that are underway have a remedy associated with them. ⁹	Soft rule implemented for the end of FY2016; hard rule for the end of FY2017
49	31	Report a site type for every site in the inventory (i.e., do not leave the field blank).	Hard rule for the end of FY2017
50	32	Certify in NSLICS that the MRS map upload is complete.	Hard rule for the end of FY2017
27	33	Report an estimated or actual site closeout date for each site in the inventory.	Soft rule implemented for the end of FY2016; hard rule for mid-year 2018
N/A	34	Report reopened sites in KBCRS.	Hard rule for mid-year 2018
24	35	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, in the Site Location table.	Soft rule implemented for the end of FY2016; hard rule for the end of FY2018
N/A	36	Identify land versus water acreage for each MRS in the inventory.	Hard rule for the end of FY2018
N/A	37	Include each MRS in the Military Munitions Response Program (MMRP) Characteristics table (MMR_CHAR).	Hard rule for the end of FY2018
N/A	38	Ensure the acreage associated with each MRS in the MMRP Characteristics table is greater than 0.	Hard rule for the end of FY2018
28	39	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.	Soft rule implemented for the end of FY2016; hard rule TBD
29	40	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 reporting FY (e.g., if a phase is scheduled to end in FY2016, there should not be funding for the phase after FY2017). ¹⁰	Soft rule implemented for the end of FY2016; hard rule TBD

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30	41	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 submission for a phase that was completed before FY2015).	Soft rule implemented for the end of FY2016; hard rule TBD
32	42	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 not be funding for the phase before FY2017).	Soft rule implemented for the end of FY2016; hard rule TBD
34	43	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 FY2013 or earlier or that is scheduled to begin in FY2017 or later).	Soft rule implemented for the end of FY2016; hard rule TBD
36	44	If a site has not achieved RIP, ensure the RA-O phase is not complete or underway. ^{6 8 11 12}	Soft rule implemented for the end of FY2016; hard rule TBD
38	45	Ensure an RA-O phase that is underway or planned is not scheduled to end after a site achieves RC. ⁴	Soft rule implemented for the end of FY2016; hard rule TBD
39	46	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. ^{4 13}	Soft rule implemented for the end of FY2016; hard rule TBD
40	47	Ensure there is no more than two years between the end of the RA-O phase and the RC date. ^{4 11 13}	Soft rule implemented for the end of FY2016; hard rule TBD
41	48	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 the start of the RA-O phase. ^{4 13}	Soft rule implemented for the end of FY2016; hard rule TBD
42	49	Ensure a planned LTM phase is not scheduled to begin more than one year before a site achieves RC. ^{6 8}	Soft rule implemented for the end of FY2016; hard rule TBD
43	50	Ensure there is not a gap of ten or more years between the RC date and the start of a planned LTM phase. ⁴	Soft rule implemented for the end of FY2016; hard rule TBD
44	51	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 schedule for the site in the end of FY2015 KBCRS submission).	Soft rule implemented for the end of FY2016; hard rule TBD
46	52	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 phases are complete or underway, and/or where the RIP and RC dates are actual dates. ^{6 8}	Soft rule implemented for the end of FY2016; hard rule TBD
47	53	Report an actual ROD/DD date (envst_dd_ymdt) for each site where the RD, RA-C, and/or RA-O phases are underway.	Soft rule implemented for the end of FY2016; hard rule TBD

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48	54	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 planned. ^{6,8}	Soft rule implemented for the end of FY2016; hard rule TBD
N/A	55	If a phase is scheduled to end after the Future Years Defense Program, ensure there is future funding for the phase (e.g., in the end of FY2016 submission, if a phase is scheduled to end in FY2025, there should be future funding for the phase. ¹⁴	Soft rule for mid-year 2018; hard rule TBD
N/A	56	Ensure pre-RIP phases (i.e., PA, SI, RI/FS, RD, RA-C) are not scheduled to end after a site achieves/achieved RIP. ^{4,6,8}	Soft rule for mid-year 2018; hard rule TBD
N/A	57	Ensure a planned RA-O phase is not scheduled to begin more than one year before a site achieves RIP. ^{6,8}	Soft rule for mid-year 2018; hard rule TBD
N/A	58	Report the reason for decreasing the acreage associated with a munitions response area in KBCRS.	Hard rule TBD

¹ As of October 6, 2016.

² As of December 20, 2017.

³ Proposed implementation dates in FY2018 are tentative.

⁴ Excludes sites where the phase(s) in question is complete and/or the milestone(s) in question has been achieved.

⁵ Excludes sites where the DoD Component cannot obtain rights of entry.

⁶ Excludes multi-media sites.

⁷ 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.

⁸ Excludes reopened sites, as reported in the Reopened Sites table (REOPEN_RIPRCSC).

⁹ Excludes sites where RA-O is the final remedial action phase and the RA-O phase does not have an associated remedy if there is an RA-C phase for the site and the RA-C phase has an associated remedy.

¹⁰ Excludes Navy BRAC sites.

¹¹ 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.

¹² Excludes sites flagged performance-based contract sites.

¹³ Excludes potentially responsible party sites that have a project negotiation phase associated with them.

¹⁴ Excludes the LTM phase; will remain a soft rule for the RA-O phase.

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.

Knowledge-Based Corporate Reporting System (KBCRS) Reporting Guidance for Site Transfers

Sites that Transfer, along with all Liability, to a non-DoD Federal Agency:

- The losing DoD Component should flag sites that transfer to another federal agency by reporting “LT” in the envst_type_cd field in the KBCRS Site table (ENV_REST_SITE).
- The losing DoD Component should also report the minimum information required for administrative error sites in KBCRS. This includes the following fields in the KBCRS Site table: ins_id, comp_id, env_site_id, fund_source_cd, and envst_ph_prog_cd.
- The losing DoD Component should report this information in all KBCRS data submissions subsequent to the transfer.

Sites that Transfer between DoD Components or between the Active and Base Realignment and Closure (BRAC) Programs:

- Installation-Level Information:
 - For transfers between DoD Components, the gaining DoD Component can report the transferred sites under the Federal Facility Identification Number (FFID) for one of its existing installations if the gaining and losing installations are located near each other. The gaining DoD Component should make every effort to associate the transferred sites with an existing installation that is located in the same state or territory as the losing installation. If that is not feasible, the gaining DoD Component must ensure that the state code (us_st_al_cd) in the KBCRS Site table reflects the state or territory in which the transferred sites are located, not the state or territory in which the gaining installation is located. The gaining DoD Component can also create a new installation with either a new FFID or the losing DoD Component’s FFID.
 - For transfers between programs (i.e., active and BRAC), the FFID should not change if the site transfers between programs at one installation. If a site transfers between programs and to another installation, the gaining program should report the site under the FFID for the gaining installation.
- Site-Level Information:
 - If an entire installation transfers to another DoD Component or program, the gaining DoD Component or program should report all sites identified by the losing DoD Component at the installation prior to the transfer, regardless of the disposition of the sites (e.g., site closeout (SC), administrative error sites).
 - For transferred sites that have not achieved SC, the gaining DoD Component or program should report all historic data the losing DoD Component or program reported prior to the transfer, to the extent the gaining DoD Component’s or program’s source system can maintain the data. This includes populating the required fields in the following KBCRS tables, at a minimum and as appropriate:
 - Site (ENV_REST_SITE),
 - Cleanup Driver (ENVST_CLEANUP_DRVR),

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- Records of Decision/Decision Documents (RODs/DDs) (ENVST_DD),
 - Landowner (ENVST_LANDOWNER),
 - Site Location (ENVST_LOC),
 - Phases (PHASES),
 - Phases Remedy (PHASES_REMEDY),
 - Land Use Controls (LUCs) (LUC_ENVST),
 - Munitions Response Site (MRS) Acreage (MMR_CHAR), and
 - Cost-to-Complete (CTC)/Funding (ENVST_FND, ENVST_FND_PROJ_MGT, and CTC_CHG).
- For transferred sites that have achieved SC, the gaining DoD Component or program does not have to report all historic data the losing DoD Component or program reported prior to the transfer (e.g., phase data, remedies); however, the gaining DoD Component or program should report the minimum information required for Defense Environmental Restoration Program (DERP)-eligible sites. This includes populating the required fields in the following KBCRS tables, at a minimum and as appropriate:
- Site (ENV_REST_SITE),
 - Cleanup Driver (ENVST_CLEANUP_DRVR),
 - Landowner (ENVST_LANDOWNER), and
 - MRS Acreage (MMR_CHAR).
- For each transferred site, the gaining DoD Component or program should report the date the losing DoD Component or program first reported the site in KBCRS, not the date the gaining DoD Component or program first reported the site in KBCRS.
- For each site that transfers to another DoD Component or program, the gaining DoD Component or program should populate the envst_trns_tx field and, if needed, the env_site_prev_id field in the KBCRS Site table as follows:
- In the envst_trns_tx field, include the FFID reported by the losing DoD Component or program prior to the transfer; the name of the losing DoD Component or program; an indication that the site transferred from the DoD Component (the text should include “transferred from”); and the date of the transfer in YYYYMM format (e.g., Transferred from Army, AK021452215700, 201010).
 - In the env_site_prev_id field, include the Site ID reported by the losing DoD Component or program, if the gaining DoD Component or program changes the Site ID upon transfer.

This requirement is necessary to document the transfer and maintain a link to the historic data reported by the losing DoD Component or program in KBCRS prior to the transfer.

Knowledge-Based Corporate Reporting System (KBCRS) Reporting Guidance for Site Transfers

- For each site that transfers to another DoD Component or program, the losing DoD Component or program should either
 - Remove the site from its inventory, or
 - Flag the site as an administrative error by populating the envst_trns_tx field in the KBCRS Site table as follows: include the FFID reported by the gaining DoD Component or program upon transfer; the name of the gaining DoD Component or program; an indication that the site transferred to this DoD Component (the text should include “transferred to”); and the date of the transfer in YYYYMM format (e.g., Transferred to Air Force 200910; AF Ins_ID NJ221042027500). The losing DoD Component or program should also report the minimum information required for administrative error sites in the KBCRS Site table (ins_id, comp_id, env_site_id, fund_source_cd, and envst_ph_prog_cd).

This requirement is necessary to document the transfer and ensure the sites are not double counted in the inventory.

- If the losing DoD Component or program obligates funding at a transferred site during the year of transfer, the losing DoD Component or program should coordinate with the gaining DoD Component or program and report the obligations as follows in the KBCRS Funding table (ENVST_FND):
 - The ins_id, fund_src_cd, and env_site_id reported by the gaining DoD Component or program for the transferred site,
 - The comp_id reported by the gaining DoD Component for the transferred site,
 - The fund_comp_id of the losing DoD Component,
 - The fund2_src_cd of the losing DoD Component or program, along with the amount obligated during the year of transfer (envst_fnd_f_am), and
 - The other required fields in the KBCRS Funding table (e.g., envstph_cd).

The losing DoD Component or program should not report a CTC estimate for a transferred site.

- If a transferred site becomes an administrative error site upon transfer (e.g., the gaining DoD Component or program decides to use a closed range as an operational range), the gaining DoD Component or program should:
 - Flag the site as administrative error site by reporting the appropriate site type in the envst_type_cd field in the KBCRS Site table (e.g., RG),
 - Report the minimum information required for administrative error sites in the KBCRS Site table (ins_id, comp_id, env_site_id, fund_source_cd, and envst_ph_prog_cd), and

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- Document the transfer by populating the envst_trns_tx field and, if needed, the env_site_prev_id field in the KBCRS Site table, as noted above for each site that transfers to another DoD Component or program.

If, in the future, an administrative error site becomes a DERP-eligible site, the gaining DoD Component should:

- Replace the administrative error site type in the envst_type_cd field in the KBCRS Site table with an actual site type (e.g., LF),
 - Report the required information for the site, which includes populating the fields in the KBCRS tables listed above as required for transferred sites that have not achieved SC, and
 - Continue documenting the transfer by populating the envst_trns_tx field and, if needed, the env_site_prev_id field in the KBCRS Site table as noted above for each site that transfers to another DoD Component or program.
- The gaining and losing DoD Components and programs should report the installation- and site-level information as outlined above in all KBCRS data submissions subsequent to the transfer, as appropriate.

Re-dated Sites and Response Complete (RC) Dates

A re-dated site is a site that has a projected RC date in one Knowledge-Based Corporate Reporting System (KBCRS) submittal and an actual RC date that predates the current reporting year in the next KBCRS submittal (e.g., in the Fiscal Year (FY) 2016 submittal a site had a projected RC date in FY 2020, and in the FY 2017 submittal that site has an actual RC date in FY 2005).

For sites re-dated to FY 2011 or earlier, the actual RC date is accurate if the DoD Component has documentation from that year supporting the RC determination (e.g., Remedial Action Completion Report, written regulator agreement) or a memorandum for the record (MFR) prepared that year to document the RC determination. If the DoD Component obtained regulator agreement on the RC determination or developed and signed an MFR to document the RC determination during the current reporting year, the RC date for the site should be in the current reporting year.

For sites re-dated to FY 2012 or later, the actual RC date should reflect the date the DoD Component received regulator agreement or the date on the signed MFR prepared to document the RC determination, in accordance with the revised DoD Manual 4715.20, *Defense Environmental Restoration Program (DERP) Management*.