

OMB Memo Subject	OMB Memo Date	Category	Comments/Summary	Impact on MCC
Clarifying Chief Acquisition Officer Roles and Responsibilities	18-Oct-12	Workforce/ Human Capital	Addresses the differing roles of Chief Acquisition Officers and Senior Procurement Executives. Aside from providing an attachment that clearly lays out the statutory roles and responsibilities of the CAO, urges CAOs to focus more on 1) buying smarter, 2) strengthening the acquisition workforce, 3) building the right supplier relationships, and 4) advancing mission performance.	Uncertain. The memorandum demands that agencies develop internal policies and operating procedures to reflect the separation of duties between the CAOs and SPEs. The impact of this on agencies which lack separation in these roles, including small agencies such as MCC, could be extraordinarily problematic. While only CFO act agencies are required to provide the updated policies to Joannie Newhart, it is unclear what small agencies should do.
Contracting Guidance to Support Modular Development	14-Jun-12	Information Technology	Encourages use of modular contracting methods and development in capital IT projects, as well as references sources of guidance for how to implement these approaches. Emphasizes that agencies need to incorporate modular approaches in their capital planning and investment controls	Minimal as MCC does not engage in very many large-scale software or IT development projects, but does utilize more of a modular approach when undertaking such projects to the extent that MCC can as a small agency.
Follow-up: April 25, 2012 Meeting of the Small Business Procurement Group	06-Jun-12	Small Business	Follow up to the previous Small Business Procurement Group memorandum. Directs agencies to take steps on and report on three major areas: maximizing opportunities for small businesses under the simplified acquisition threshold, increasing small business participation under multiple award contracts, and strengthening accountability for small business achievement. The memorandum seems focused on "all agencies" and asks that "all agencies" report.	Uncertain. The memorandum, in a straightforward manner, requests reviews of small business programs, is addressed to small business directors, which may not be in place for small agencies. This could be a significant burden if such regular reports are expected from the small agencies, as they do not have small business directors and formal small business programs to address these issues.
"Myth-Busting 2": Addressing Misconceptions and Further Improving Communication During the Acquisition Process	07-May-12	Communication with Industry	Follow up to first "Myth-Busting" memorandum. This memorandum focuses on dealing with myths that may be held in the vendor community, as opposed to the focus on misconceptions among federal agencies as addressed in the first memorandum.	Minimal, as the focus of the memorandum is on private industry, it does provide some useful guidance and best practices, but does not require any reporting or development of additional internal policy in response.

Federal Activities Inventory Reform (FAIR) Act Submission for FY 2012	26-Mar-12	CSM/A-76/FAIR	Discusses updates to guidance for Service Contract Inventories in accordance with the FAIR Act for FY 2012, including forms and deadlines for submission.	None. Due to MCC's statutory nature as a Government-owned corporation, MCC is exempt from the FAIR Act.
Service Contract Inventories	19-Dec-11	CSM/A-76/FAIR	Discusses updates to guidance for Service Contract Inventories in accordance with the FAIR Act for FY 2011, including forms and deadlines for submission. Also addresses what agencies must consider in preparing and developing FY 2012 inventories.	None. Due to MCC's statutory nature as a Government-owned corporation, MCC is exempt from the FAIR Act.
Increasing Opportunities for Small Businesses in Purchase Card Micro-Purchases	19-Dec-11	Small Business	Stresses importance for agencies in opening up micro-purchases and purchase card actions for small businesses. Directs the agencies to incorporate the topic of small business consideration in agency purchase card policy and guidance, as well as in training for card-holders. Senior card managers are referenced specifically in the memorandum as having responsibility for implementing these revisions and emphasizing small business participation.	Minimal as while the information in MCC Standard Operating Procedures are updated with consideration for small businesses and could be re-looked at, no specific reporting is required from this memorandum.
Development, Review, and Approval of Business Cases for Certain Interagency and Agency-specific Acquisitions	29-Nov-11	Interagency	This memorandum creates new requirements for either creating a new Governmentwide, Multi-agency, or Agency specific contract (defined essentially as a BPA, BOA, or IDIQ). The memorandum establishes thresholds and provides a format and procedures for preparing the business cases for such vehicles.	Unlikely to have any impact on MCC as small agencies rarely establish GWACs and MACs, as well as the fact that the thresholds for MACs are above \$100M in anticipated value. Agency-specific contracts that overlap GWACs or FSSI may be problematic, but that threshold is also set at \$50M in cumulative value. Currently, this would not affect any MCC contracts.

Improving Small Business Procurement Data - Quality and Process	14-Nov-11	Small Business	Addresses the changes in process for small business anomaly reports issued by SBA for agency scorecards by incorporating them into FPDS data quality audits by agencies, reducing the redundancy in the two separate processes.	None, as the small business anomaly reports are only provided to CFO Act agencies, so they do not affect small agencies such as MCC
Reduced Contract Spending for Management Support services	07-Nov-11	Competition and High-Risk Contracts	Identifies the 12 Product Services Codes (PSCs) that OFPP consider Management Support Services and the series of steps CFOs and CAOs are expected to take in order to monitor and reduce spending on these categories. Articulates that spending on these contracts has increased substantially over the past decade and that it must be reduced due to the fact that most are procured using high-risk type contracts (T&M) and can create over-reliance on contractors.	Minimal as the focus seems to be on incorporating discussions and reporting on reducing spending into AcqStat sessions. Agencies not subject to AcqStat, such as small agencies, would not seem to have to issue any formal reports on the subject. However, the identified focus on monitoring and reducing the spending is still placed on all CFOs, CAOs, and SPEs, so even small agencies should be making an effort to track and reduce spending on these PSCs. MCC has and will continue to do this through standard FPDS reports on spending for each of the identified PSCs. The memorandum also includes some suggested best practices for reducing these costs in contracts.
Improving Sustainable Acquisition and Reporting	05-Oct-11	Greening Government	Discusses changes in Product Service Codes (PSC) in FPDS and the PSC manual in order to better capture information regarding sustainable acquisition and reporting on sustainable acquisition achievements as a component of agency sustainability plans submitted to CEQ.	Minimal, as most of MCC's contracts are for consulting and engineering services that do not involve the procurement of bio-based or EPA-designated products other than basic office supplies. As such, the new areas in these PSC codes, largely applicable to construction, janitorial, laundry, cafeteria, and electronics/technology are rarely directly procured by MCC or even incidentally in MCC contracts.
Revisions to Federal Acquisition Certification for Contracting Officer's Representative (FAC-COR)	06-Sep-11	Workforce/ Human Capital	Replaces previous FAC-COTR standards with three-tiered FAC-COR standards, standardizing COTR terminology to COR. Also discusses applicability of certification levels and responsibility for FAC-COR workforce certifications at Agency ACMs.	Substantial, as is much of the Government. While the memorandum creates the framework of FAC-COR, it leaves many actions up to the agency to decide when certification levels are appropriate and increases responsibilities of the ACM. Also, the FAC-COR levels also must be taken into account for AHCPs, which small agencies are not required to do.

Supporting Energy and Sustainability Goal Achievement Through Efficiency and Deployment of Clean Energy Technology	16-Aug-11	Greening Government	Further prioritizes use of Energy Savings in Performance Contracts (ESPCs), encouraging agencies to issue such contracts in addition to Utility Energy Services Contracts (UES) and Power Purchase Agreements (PPA) to reduce energy costs and become further efficient in energy usage.	There are not specific taskers for agencies in terms of reporting from this particular memorandum other than to incorporate its topics and potential use of certain contracting vehicles in order to reduce energy consumption and increase energy savings in the agency sustainability reports and plans submitted annually to CEQ.
Guidance for Specialized Information Technology Acquisition Cadres	13-Jul-11	Workforce/ Human Capital	Discusses techniques for organizing and collaborating for IT acquisitions amongst program managers, CORs, and Contracting Professionals. It suggests organizing such individuals into standing cadres, including examples of best practices from DoD organizations, NIH, and VA.	Minimal, though possible best practices to examine, most of the guidance focuses on how to accomplish the objectives within larger organizations where individuals can be dedicated to certain functions. May not be practical for small agencies. In addition, the required reporting and addendum to the Acquisition Human Capital Plan does not apply to MCC as there is no requirement for MCC to complete an AHCP.
Improving Federal Procurement Data Quality - Guidance for Annual Verification and Validation	31-May-11	FPDS	Annual guidance discussing verification and validation procedures for FPDS data, including reporting templates and submission guidelines	Important as it contains all the necessary information to complete the FPDS validation and verification for FY 2011. It is also mandatory for all agencies in accordance with FAR 4.604
Increasing Small Business Participation in Federal Contracting	11-Feb-11	Small Business	Discusses small business procurement group, an informal group with rotating membership of senior officials. CFO Act Agencies are largely the agencies referenced, states outreach strategies to be conducted and reported on by each of the agencies.	The memo seems to suggest that the small business procurement group agencies must report, but does use the language "each agency." It does not seem as though reporting is expected from small, non-CFO Act agencies. The memo does contain substantial information on small business outreach strategies that may be useful, however. Unclear whether these practices are expected to be implemented and reported on by all agencies, but would seem impractical for small agencies if that is the case as these agencies lack dedicated small business directors and specialists, as well as availabilities for senior managers to participate in conferences and one on ones with small businesses.

Attracting Talent to the Acquisition Workforce	04-Feb-11	Workforce/ Human Capital	Discusses various hiring authorities for the acquisition workforce, including a comprehensive list of these authorities available in attachment 1, broken down by the types of individuals that can be hired using the authority	MCC has its own hiring authorities, so these would not have high impact, but would be useful in cases of MCC needing to find other hiring authorities for the acquisition workforce.
"Myth-Busting": Addressing Misconceptions to Improve Communication with Industry during the Acquisition Process	02-Feb-11	Communication with Industry	Emphasizes that the Federal Acquisition Regulation (FAR) authorizes a broad range of opportunities for vendor communication, but agencies often do not take full advantage of these existing flexibilities. Discusses "Top 10 Misconceptions and Facts." Requirement that each agency develop a high-level vendor communication plan.	Requirement to generate, update, and make publicly available the plan falls only on the 24 CFO Agencies. Small agencies "encouraged to review their existing vendor communication guidance in light of the principles discussed in this memorandum and make appropriate modifications to encourage more communication, or develop guidance if none exists." MCC may want to explore creating such guidance, but it is optional and not a requirement.
Improving Contractor Past Performance Assessments: Summary of the Office of Federal Procurement Policy's Review, and Strategies for Improvement	21-Jan-11	Past Performance - Contractor Performance Information	Establishes a process for OFPP's review of agencies' past performance assessments and shares the findings of OFPP's initial review and recommend additional steps and strategies for improving the collection of past performance information.	Discusses issues and concerns OFPP found in review of agencies and their internal policies and procedures for documenting Past Performance Information. Shares recommendations for improvement and also documents upcoming FAR changes and training instruments and policy updates to CPARS Guide and FAI training. Key document for researching MCC internal past performance policy and methods.
Service Contract Inventories	05-Nov-10	CSM/A-76/FAIR	Provides guidance to help agencies prepare their initial inventory covering service contracting in accordance with the FAIR Act and FY 2010 Consolidated Appropriations Act	None. While service contract inventory is mandated by FY 2010 Consolidated Appropriations Act, P.L. 111-117, that statutes required the agency to submit the inventory only if they were to do so in accordance with the FAIR Act

Improving the Accessibility of Government Information	19-Jul-10	Section 508	Provides guidance and awareness regarding existing resources (www.section508.gov) and direct agencies to take stronger steps toward improving the acquisition and implementation of accessible technology. States that a survey of agencies will be conducted in September 2009 with results and recommendations to be published in the spring of 2011	Does not require any specific reporting but states that GSA will begin conducting quarterly reviews of random samplings of solicitations on FBO.gov to conduct Section 508 reviews. May want to insure that MCC staff is up to date on Section 508. Web trainings are available and a guide to solicitation preparation is available.
Survey of Agency Policies and Practices Regarding Contractor Tax Delinquencies	25-Feb-10	Ethics/Fraud	Establishes survey valuate practices of contracting officers and of suspension and debarment officials (SDOs) in response to contractors' certifications of tax delinquencies.	Survey responses were due Wednesday March 17, 2010. No further action required beyond survey. Does address the issues of agency policies and internal controls, actions by contracting officers, and actions by suspension and disbarment officials. May want to insure MCC staff are aware of the "actions by contracting officers" piece of the survey and memorandum to ensure future compliance.
Achieving Better Value from Our Acquisitions	22-Dec-09	Strategic Sourcing	Discusses agency plans and identifies a wide variety of strategies to achieve more than \$19 billion in savings for FY 2010 – including the pursuit of new avenues for strategic sourcing, program terminations and reductions, use of online reverse auctions and electronic sealed bids, and more aggressive renegotiation of contracts. Plans also show that agencies are developing initiatives to reduce high-risk contracting for new contracts by 10 percent. Many of the initiatives are tied to improving the acquisition workforce's capability to manage high-risk contracts and to ensure	No action required in memorandum, but does identify a variety of best practice, particularly in the areas of contract renegotiation, strategic sourcing, and workforce capability. May want to review for developing guides and internal policy.
Survey on 2009 Green Purchasing Requirements	23-Nov-09	Greening Government	Request that agencies complete the annual survey of its green purchasing, recycling, and chemicals management activities by responding to the Office of Management and Budget (OMB) MAX federal community (Max) webpage no later than January 15, 2010. Updates guidance from FY 2008 survey.	MCC may need to submit survey in future Fiscal Years. Requirements of EO 13423 apply to all heads of agency, and request that all heads of agencies provide reports to Chairman of the Council on Environmental Quality. Plan goes beyond procurement, though, and focuses on developing an agency-wide environmental management system (EMS). Green purchasing is only one part of the plan and one part of the survey. Should check with OMB/OFPP to determine what they expect from MCC.
Performance-based Management Systems	29-Oct-09	EVM	Requests select agencies to provide budget and performance data for their 10 largest planned and/or current major real property asset construction projects. The responses will be used, in part, to help identify programs where PBMS practices are strong and may serve as a model for other agencies. The responses will further be used to begin defining portfolios of non-IT investments, similar to the portfolio for IT found at Exhibit 53 in Circular A-11, that will lay the foundation for more comprehensive evaluations of program performance.	Data call is related to construction projects and is not directed at MCC. Resulting efforts and report on this data call may hint at implementing EVM for non-IT related projects, the main concern of the memo.

Acquisition Workforce Development Strategic Plan for Civilian Agencies - FY 2010-2014	27-Oct-09	Workforce/ Human Capital	Acquisition Workforce Development Strategic Plan to guide the growth in capacity and capability of the civilian agency acquisition workforce over the next five years. Focuses on 1) need for workforce growth, 2) comprehensive annual planning process managed by OFPP, 3) increased use of intern programs and other training and development initiatives, 4) five year action plan to improve workforce development initiatives and management infrastructure	None. This is overall civilian agency strategic plan developed with input from civilian agencies. It does outline trends, roles, and responsibilities that may need to be considered in a plan if MCC develops its own.
Increasing Competition and structuing Contracts for the Best Results	27-Oct-09	Competition and High-Risk Contracts	Provides initial guidelines to help CAOs and SPEs evaluate effectiveness of their agency's competition practices and processes for selecting contract types. Focus on three key questions: 1) How is the agency maximizing the effective use of competition and choosing the best contract type for the acquisition? 2) How is the agency mitigating risk when non-competitive, cost-reimbursement, or T&M/LH contracts are used? 3) How is the agency creating opportunities tto transition to more competitive and lower risk contracts?	Provides OMB guidance for reducing and dealing with high-risk contracts and strengthening competition. Issues raised in it would likely be raised in audits and should be reviewed in establishing internal MCC policies and procedures, especially in regards to templates and memorandums justifying contracting actions.
Improving Acquisition Data Quality for Fiscal Years 2009 and 2010	07-Oct-09	FPDS	outlines the steps agencies must take in FY 2010 to improve acquisition data quality. The FPDS Data Quality Working Group has worked with my staff for the past several months to analyze agencies' FY 2008 data quality plans and certification reports. These plans and reports demonstrate that agencies are generally undertaking more disciplined processes to improve and validate the accuracy of their FPDS information than in the past. However, the group found three areas where the validation and reporting guidance and processes could be improved.	Provides OMB guidance for implementing requirements of FAR 4.604(c) requiring agency CAO to certify "whether and to what degree agency Car data for the preceding fiscal year is complete and accurate." MCC does not seem to be exempt from this requirement as it is a FAR requirement and OMB does not suggest any agencies do not have to follow. Memo is addressed to CAOs and SPEs. Should discuss issue with SAC and OFPP as to what MCC will need to produce. Additionally, the requirement in the FAR is for the "CAO" to submit the information. As CAO's are only required to be designated within CFO agencies per SARA (PL 108-136) Section 1421 and 31 USC 901 (c)(1), MCC may be exempt.
Interim Guidance on Reviewing Contractor Repors on the Use of Recovery Act Funds in accordance with FAR Clause 52.204-11	30-Sep-09	Recovery Act	Describes the reporting process and the agency requirements for agencies to review reports for 1) consistency with award information, 2) significant errors, and 3) material omissions for all Recovery Act contract IAW FAR 52.204-11	No action required in memorandum for MCC as MCC does not have any Recovery Act contracts.
Improving the Use of Contractor Performance Information	29-Jul-09	Past Performance - Contractor Performance Information	(1) Describes new requirements in the Federal Acquisition Regulation (FAR) to strengthen the use of contractor performance information, (2) outlines associated management responsibilities that agency Chief Acquisition Officers (CAOs) and Senior Procurement Executives (SPEs) must take to support robust implementation of these practices, and (3) establishes the review process that the Office of Federal Procurement Policy (OFPP) will use to further improve contractor performance information.	Outlines FAR changes requiring use of PPIRS by all agencies as well as tasks agencies with developing specific internal procedures. CFO Act agencies (not MCC) required to submit those policies to OFPP and OFPP will also conduct compliance assessments with those agencies. Also mentions GAO report GAO-09-374 as critical. Guidance could be helpful in developing MCC internal policy.

Improving Government Acquisition	29-Jul-09	Competition and High-Risk Contracts	Requires agencies to take the following actions: (1) review their existing contracts and acquisition practices and develop a plan to save 7 percent of baseline contract spending by the end of FY 2011; and (2) reduce by 10 percent the share of dollars obligated in FY 2010 under new contract actions that are awarded with high-risk contracting authorities.	Reporting is only required for CFO Act agencies, MCC exempt per 31 USC 901(c). MCC still running high risk report and collecting data in order to meet goals internally. Monitor high risk issues to change report if necessary and for best practices.
Acquisition Workforce Human Capital Plans	07-Jan-09	Workforce/ Human Capital	Agencies' current acquisition resource and competency data should be included in their Human Capital Management Report (HCMR) submitted to the Office of Personnel Management (OPM) on December 15, 2008, in accordance with OPM guidance of October 16, 2008 to Deputy Chief Human Capital Officers.	MCC may need to develop plan. While one was not developed in 2008, current data calls are out for updates. While new documentation states that it only applies to CFO Act agencies, the NDAA of 2008 made the requirement applicable to all Executive Agencies, which MCC qualifies for under 41 USC 403(1)(d)
Preventing Fraud in Federal Contracting	14-Nov-08	Ethics/Fraud	Discuss new anti-fraud measures, including requirements for contractors to have written codes of business ethics and ethics compliance programs. Also requires that agencies that have Chief Acquisition Officers pursuant to the Services Acquisition Reform Act (P.L. 108-136) shall report to the Office of Federal Procurement Policy the steps taken to disseminate this information and to disseminate agency specific policies or requirements related to deterring procurement fraud.	Observe new FAR requirements. Requirement to report anti-fraud measures seems to only apply to CFO agencies per SARA (PL 108-136) Section 1421 and per 31 USC 901 (c)(1)
Report to Congress on FY 2008 Competitive Sourcing Efforts	30-Oct-08	CSM/A-76/FAIR	Memorandum provides guidance to assist agencies in preparing their Congressional reports on FY 2008 efforts. Reports on FY 2008 efforts are due to Congress by December 31, 2008. The guidance for preparing FY 2008 reports is similar to that developed by the Office of Management and Budget (OMB) for prior fiscal year reports.	None. This guidance only applies to those agencies required to report to Congress on FY 2008 Competitive Sourcing activities IAW Fair Act and A-76. As MCC is a Government corporation IAW SEC 604, it is exempt from FAIR Act Requirements IAW 5 USC 104 and thus exempt from Competitive Sourcing requirements
FY 2008 Reporting on Green Purchasing Requirements	20-Oct-08	Greening Government	Request that agencies complete the attached annual survey of its green purchasing, recycling, and chemicals management activities by posting the completed survey response to the Office of Management and Budget (OMB) MAX federal community webpage no later than February 16, 2009. It also serves to alert agencies that the due date for future fiscal year reporting on green purchasing will be moved to January to coincide with other reporting requirements of Executive Order (E.O.) 13423. Provides FY 2008 Reporting Template	MCC may need to submit survey in future Fiscal Years. Requirements of EO 13423 apply to all heads of agency, and request that all heads of agencies provide reports to Chairman of the Council on Environmental Quality. Plan goes beyond procurement, though, and focuses on developing an agency-wide environmental management system (EMS). Green purchasing is only one part of the plan and one part of the survey. Should check with OMB/OFPP to determine what they expect from MCC. Review FY 2009 memo for more updated information

Effective Practices for Enhancing Competition	17-Jul-08	Competition	Highlights the steps you are taking to strengthen competition practices in Federal acquisition and practices to increase competition. Discusses competition advocate reporting requirements	Possible best practices and other material to incorporate into Acquisition Instructions or other MCC processes. References topics that should be discussed in Competition Advocate reports to be submitted IAW FAR 6.502(b). MCC is not included in the memo's Attachment B: Agency Competition Advocates Listing, and FAR 6.502(b) states that the report is just to SPE and CAO, so may not have to submit report to OFPP.
Plans for Commercial Service Management	11-Jul-08	CSM/A-76/FAIR	Commercial Service Management is the new name for Competitive Sourcing (A-76). Provides guidance to agencies as they prepare plans under this initiative. CSM initiative will also track agencies' business process reengineering (BPR) efforts	EXEMPT. CSM/A-76 reporting and plans referenced in this memo rely upon inventories and documentation established by the FAIR Act. As MCC is a Government corporation IAW SEC 604, it is exempt from FAIR Act requirements IAW 5 USC 104 and thus is exempt from Competitive Sourcing Requirements
Improving the Management and use of Interagency Acquisitions	06-Jun-08	IAA/Strategic Sourcing	Provides guidance to help agencies (1) make sound business decisions to support the use of interagency acquisitions and (2) strengthen the management of assisted acquisitions. Particular emphasis is placed on helping requesting agencies and servicing agencies manage their shared fiduciary responsibilities in assisted acquisitions. The guidance includes a checklist of roles for each responsibility in the acquisition lifecycle and a model interagency agreement to reinforce sound contracting and fiscal practices.	Guidance for implementing any sort of interagency acquisition, be it Direct acquisition or assisted acquisition. Provides checklists and other documentation as well as information on how to formulate best interest determinations. Should insure that MCC is in compliance.
Conducting Acquisition Assessments Under OMB Circular A-123	21-May-08	A-123	Guidance for conducting entity level internal control reviews	EXEMPT. A-123 reviews, audits, and reports are only required for CFO Act Agencies IAW Appendix A of Circular A-123. MCC is not included in the CFO Act as a CFO Act agency and thus is exempt from Appendix A of A-123, the relevant section requiring the reviews and reports this memo covers
Improving Acquisition Data Quality - FY 2008 FPDS Data	09-May-08	FPDS	Provides guidance on improving the quality of agency acquisition data. Builds on and supersedes the FY 2007 guidance for verifying, validating, and certifying FPDS data and includes additional information on the desired format for reporting plans to verify and validate FY 2008 FPDS data	More recent memos related to FPDS and the verification and validation process for FPDS data. Those should be referred to instead of this memo.
Use of Performance-based Acquisition	21-Jul-06	PBA	Request that agencies submit a performance-based acquisition (PBA) management plan, describing current and future PBA activities that will result in an annual increase in the number of PBAs. Provides template for plan.	Requirement from 2006, but provides some issues that should be considered in developing internal PBA policy for MCC.

Implementing Strategic Sourcing	20-May-05	Strategic Sourcing	Tasks the CAO with leading a CAO/CFO/CIO development team to identify commodities for strategic sourcing excluding software under Smart Buy, develop agency-wide strategic sourcing plan, and report on results of Strategic Sourcing initiatives annually starting in January 2006	MCC may need to develop strategic sourcing plan. Requirement is directed at CAOs, CIO, and CFOs. Should discuss issue with SAC and OFPP as to what MCC will need to produce. Additionally, the requirement is based on having the "CAO" to submit the information. As CAO's are only required to be designated within CFO agencies per SARA (PL 108-136) Section 1421 and 31 USC 901 (c)(1), MCC may be exempt. The memo itself contains no FAR, E.O., or statutory citations for this requirement
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