



COMMANDANT INSTRUCTION 1550.26

Subj: FORCECOM COMMERCIALY CONTRACTED “C” SCHOOL COURSES

Ref: (a) Federal Acquisition Regulation (FAR), Subpart 1.6  
(b) Performance, Training, and Education Manual, COMDTINST M1500.10 (series)  
(c) Training Evaluation Policy, COMDTINST 1550.23 (series)  
(d) Financial Resource Management Manual-Procedures (FRMM-P), COMDTINST M7100.4 (series)

1. PURPOSE. This Instruction establishes FORCECOM’s commercially contracted “C” school policy for program managers (PM), contracting officers (KO), contract specialists (KS), contracting officer’s representatives (COR), resource managers (RM), training managers (TM), course managers (CM), Performance Systems Branches (PSBs)/Training Centers (TRACENs) and the Education & Training Quota Management Command (ETQC) to meet the demands of a dynamic work environment in accordance with References (a)-(d). Nothing in this instruction pre-empts the authority of Unit Commanding Officers and Officers in Charge to procure commercially contracted training as identified by the Unit Training Board, as outlined in Reference (b) and subject to appropriations limitations which prevent the use of operating funds to contract for training provided by FORCECOM enterprise.
2. ACTION. All Coast Guard unit commanders, commanding officers, officers-in-charge, deputy or assistant commandants, and chiefs of Headquarters staff elements must comply with the provisions of this Instruction. Internet release is authorized.
3. DIRECTIVES AFFECTED. None.
4. BACKGROUND. Commercially contracted “C” schools expand the Coast Guard’s ability to provide the skills and knowledge required to support field performance. Requirements and management practices related to commercially contracted training were not standardized. Contract attainment and life cycle management, course initiation, course delivery, and course evaluation were not clearly defined. Additional barriers to successful execution of commercially contracted “C” schools include but are not limited to:

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	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z
A	X	X	X		X	X	X	X	X	X		X	X	X	X	X	X	X	X		X					
B		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
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NON-STANDARD DISTRIBUTION:

- a. Ambiguous language in Performance Work Statements (PWS) and Statements of Work (SOW).
  - b. Training Centers (TRACENs) and Performance System Branches (PSBs) are not engaged and their roles regarding commercially contracted "C" schools have not been defined or resourced.
  - c. Multiple non-standard systems and processes cause confusion, are not repeatable, and waste valuable time due to lack of alignment and standardization.
5. DISCLAIMER. This guidance is not a substitute for applicable legal requirements, nor is it itself a rule. It is intended to provide operational guidance for Coast Guard personnel and is not intended to nor does it impose legally-binding requirements on any party outside the Coast Guard.
6. IMPACT ASSESSMENT. Commercially contracted "C" schools offer an array of benefits to enhance performance. They provide the Coast Guard the means to deliver training beyond the internal capability and capacity of the Training System, thereby supporting operational requirements as communicated by specific programs and detailed through analysis. The policy and procedures that follow provide direction for standardizing systems and processes to ensure consistency and sustainability throughout the Coast Guard to achieve and maintain a ready workforce.
7. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.
- a. The development of this Instruction and the general policies contained within it have been thoroughly reviewed by the originating office in conjunction with the Office of Environmental Management, Commandant (CG-47). This Instruction is categorically excluded under current Department of Homeland Security (DHS) categorical exclusion (CATEX) A3 from further environmental analysis in accordance with "Implementation of the National Environmental Policy Act (NEPA)," DHS Instruction Manual 023-01-001-01 (series).
  - b. This Instruction will not have any of the following: significant cumulative impacts on the human environment; substantial controversy or substantial change to existing environmental conditions; or inconsistencies with any Federal, State, or local laws or administrative determinations relating to the environment. All future specific actions resulting from the general policy in this Instruction must be individually evaluated for compliance with the National Environmental Policy Act (NEPA), Department of Homeland Security (DHS) and Coast Guard NEPA policy, and compliance with all other applicable environmental mandates
8. DISTRIBUTION. No paper distribution will be made of this Instruction. An electronic version will be located on CGPortal:  
<https://cgportal2.uscg.mil/library/directives/SitePages/Home.aspx> and Internet:  
<https://www.dcms.uscg.mil/directives>.

9. PROCEDURE. All stakeholders must adhere to processes and timelines documented in Enclosure (1). Enclosure (1) outlines expectations for processes and timelines associated with the life cycle of commercially contracted “C” school courses.
10. RECORDS MANAGEMENT CONSIDERATIONS. This Instruction has been thoroughly reviewed during the Directives clearance process, and it has been determined there are no further records scheduling requirements, in accordance with Federal Records Act, 44 U.S.C. 3101 et seq., NARA requirements, and Information and Life Cycle Management Manual, COMDTINST M5212.12 (series). This policy does not have any significant or substantial change to existing records management requirements.
11. DEFINITIONS.
  - a. *Commercially Contracted “C” School Course*: a course contained within the formal training system and is contracted through a commercial entity.
  - b. *Stakeholders*: individuals who work collectively to ensure mission attainment by executing their roles and responsibilities within the mandates of programs and/or initiatives.
  - c. *Formal Training*: a course developed to meet a programmatic requirement that has a Coast Guard course number and is managed and tracked by FORCECOM Training Division (FC-T). Training designed, developed and delivered by a CG Training Center (TRACEN), Other Government Agencies (OGA), and Commercially Contracted training can fall under the formal training umbrella when training occurs within a resident, exportable, or blended learning environment.
12. REQUIREMENTS. Stakeholders involved in the commercially contracted “C” school process must use standard forms for curriculum outlines and evaluations.
13. RESPONSIBILITIES. This Instruction establishes roles and responsibilities for stakeholders assigned to manage the life cycle of commercially contracted “C” school courses.
  - a. Program Managers (PM) must:
    - (1) Identify performance requirements.
    - (2) Attend the Procurement Planning Conference (PPC) annually at the request of CG-9121 to communicate procurement needs for subsequent fiscal years (FYs).
    - (3) Write an acquisition plan using the Acquisition Planning Forecast System (APFS).
    - (4) Provide resources necessary to fund the course’s contract and associated student costs (i.e., travel, lodging, etc.).
    - (5) Ensure CMs execute responsibilities per Reference (b).

(6) Support the KO by ensuring CORs execute responsibilities per Reference (a).

b. Contracting Officers (KO) must:

(1) Execute responsibilities per Reference (a).

(2) Ensure contracting specialist(s) (KSs) and contracting officer representatives (CORs) adhere to timelines for procuring and managing commercially contracted “C” school courses.

(3) Collaborate with FORCECOM Training Division (FC-T) and FORCECOM Business Division (FC-B) during the life cycle of commercially contracted “C” school courses to ensure compliance with Reference (a).

(4) Ensure CORs execute responsibilities per Reference (a).

(5) Ensure commercially contracted “C” school courses are closed out at the end of the life cycle of the contract or when the contract is no longer required, whichever is sooner.

(6) Review evaluation data: Contractor Performance Assessment Reporting System (CPARS).

c. Contracting Specialists (KS) must:

(1) Forward all documents throughout a commercially contracted “C” school course’s life cycle to RMs, TMs, CORs, and CMs in a timely manner. Documents include all procurement documentation per Reference (a).

(2) Compile evaluation data: Quality Assurance Surveillance Plan (QASP) and Level 3 Evaluations.

(3) Ensure FORCECOM “course code (number)” and “contract type” are documented in all database spreadsheets associated with a commercially contracted “C” school course.

(4) Contact RMs once the commercially contracted “C” school course package is complete to ensure funds are released within the established timeline per Enclosure (1).

(5) Establish and maintain communication with RMs and CORs throughout the commercially contracted “C” school course’s life cycle.

(6) Closeout all contracts associated with commercially contracted “C” school courses at the end their life cycle.

## d. Training Managers (TM) must:

- (1) Lead communication amongst stakeholders throughout the commercially contracted “C” school course’s life cycle.
- (2) Monitor timelines to determine types of analysis needed based on timelines established.
- (3) Manage templates and documents associated with commercially contracted “C” school courses.
- (4) Perform training management functions required for all “C” school courses, to include but not limited to: Validation of training requirements; facilitating programmatic engagement in FC-T processes; annual throughput quota programming (“C” school build); and oversight of program quota execution and out of cycle requests.
- (5) Collaborate with CMs, PSBs, and TRACENs when determining who will administer Level 3 evaluations to students and supervisors.
- (6) File Level 3 evaluation surveys and results electronically.
- (7) Compile Level 3 evaluation results in preparation for the contracting team’s, PMs, CMs, CORs, RMs, and KSs, annual review.

## e. Resource Managers (RM) must:

- (1) Attend the Procurement Planning Conference (PPC) to consolidate FORCECOM’s performance requirements.
- (2) Ensure each commercially contracted “C” school course’s contracting package is complete.
- (3) Approve purchase validating funds availability in the financial procurement system of record.
- (4) Update the commercially contracted “C” school financial database spreadsheet weekly.
- (5) Provide FC-T a weekly account of the contracts, quotas, and AFC-56 funds released for the sole purpose of funding commercially contracted “C” school courses.
- (6) Collaborate with commercially contracted “C” school stakeholders to forecast contract needs and available funds.
- (7) Establish and maintain communication with stakeholders throughout the commercially contracted “C” school course’s life cycle.

- f. Contracting Officer's Representatives (COR) must:
  - (1) Execute responsibilities per Reference (a).
  - (2) Collaborate with Division Chiefs, KO(s), KS(s), and the PM during Phase II of the PPC to identify existing and upcoming programmatic procurement requirements.
  - (3) Support the PM in writing the procurement (acquisition) plan using APFS.
  - (4) Collaborate with the CM during Market Research to acquire technical direction specific to subject matter.
  - (5) Write the PWS or SOW, the Independent Government Cost Estimate (IGCE), APFS, Purchase Request(s), the Balanced Workforce Assessment Tool (BWAT) and Market Research in collaboration with the CM.
  - (6) Submit completed Purchase Request (PR) package and the completed contracting package to the RM.
  - (7) Once both packages, PR and contracting, have been completed, forward the documents to the KS.
  - (8) Liaise between vendors and all stakeholders associated with commercially contracted "C" school courses.
  - (9) Enforce the requirement for vendors to:
    - (a) Develop all deliverables cited in Section 14.f.1-6 of this Instruction.
    - (b) Report student disenrollment within 48 hours.
  - (10) Use ETQC's "*FIN-SMB-TQC-ChangeRequest*" mailbox to:
    - (a) Provide ETQC a copy of the first day attendance roster.
    - (b) Notify ETQC of students' disenrollment within 48 hours.
    - (c) Provide ETQC a copy of the graduation roster.
  - (11) Notify CM of student disenrollment.
  - (12) Use the QASP to ensure vendors adhere to requirements set forth in the PWS or SOW.
  - (13) Complete CPARS at the end of the base year and at the end of each option year.
  - (14) Forward QASP and CPARS results to the KS.

- (15) Forward Level 3 surveys to the TM and CM.
  - (16) Establish and maintain communication with stakeholders throughout the commercially contracted “C” school course life cycle.
- g. Course Managers (CM) must:
- (1) Execute responsibilities per Reference (b).
  - (2) Support COR during the development of the contract package.
  - (3) Collaborate with the COR to provide subject matter expertise during Market Research.
  - (4) Collaborate with the COR when writing the PWS or SOW.
  - (5) Ensure the deliverables below are specified in PWSs or SOWs for commercially contracted “C” school courses IAW FORCECOM Standard Operating Procedures:
    - (a) Curriculum Outline(s)
    - (b) Tasks, TPOs, and Evaluation Correlation Document(s)
    - (c) Instructor Guides(s)
    - (d) Student Guide(s)
    - (e) Student Rosters:
      - 1) First day attendance Roster
      - 2) Student disenrollment Roster
      - 3) Graduation Roster
    - (f) Evaluations, Levels 1-3 per Reference (c):
      - 1) Level 1 Results
      - 2) Level 2 Results
      - 3) Level 3 Surveys for students and supervisors
    - (g) Create commercially contracted course sessions after the contract is awarded.
    - (h) Retrieve Levels 1 & 2 evaluation results from the COR.

- (i) Retrieve Level 3 surveys from the COR.
  - (j) Administer Level 3 evaluations in coordination with the TM.
  - (k) Establish and maintain communication with stakeholders throughout the commercially contracted “C” school course’s life cycle.
- h. Performance Systems Branches (PSBs) and Training Centers (TRACENs) must (as directed by FC-T):
- (1) Support CM’s Instructional System Design (ISD) needs.
  - (2) Administer Level 3 Evaluations to students and supervisors when cited as a requirement within contract’s deliverable(s).
  - (3) Forward Level 3 evaluation results to the TM and CM when cited as a requirement within contract’s deliverable(s).
- i. The Education & Training Quota Management Command (ETQC) must:
- (1) Review the “*FIN-SMB-TQC-ChangeRequest*” mailbox periodically to acquire student attendance and graduation rosters and for notification of disenrollment.
  - (2) Update Direct Access (DA) to reflect student information received.

14. POLICY.

- a. Commercially contracted “C” school courses are established based on programmatic requirements and must be purchased with the sole purpose to enhance performance for Coast Guard personnel. Stakeholders must ensure timely analysis has been conducted to justify the need for a commercially contracted “C” school course prior to procuring a contract for required training. After commercial training has been justified through analysis, stakeholders assigned to commercially contracted “C” school courses must initiate processes and adhere to timelines per Enclosure (1).
- b. All stakeholders involved in the life cycle management of commercially contracted “C” school courses must adhere to processes and timelines established in Enclosure (1). Should instances occur where timelines differ from Reference (a), Reference (a) supersedes and timelines shall be adjusted accordingly. Days shall be calculated as “business” days.
- c. Stakeholders: PMs, KOs, Ks, TMs, CORs, CMs, PSBs, TRACENs, and ETQC shall adhere to the roles and responsibilities identified in Section 13.a-i of this Instruction.
- d. IAW Reference (d), AFC-56 funds must not be used for conferences nor will conferences be assigned a course code/number.



- e. Courses funded through Interagency Agreements (IAA) must not be identified as commercially contracted “C” school courses.
  - f. In addition to trained students and other requirements outlined in Reference (a), vendors shall be required to prepare, complete, and forward the following documents within specified timelines; therefore, these documents or timelines must be stated as requirements in the PWS or SOW:
    - (1) Curriculum Outline(s)
    - (2) Tasks, TPOs, and Evaluation Correlation Document(s)
    - (3) Instructor Guide(s)
    - (4) Student Guide(s)
    - (5) Student Rosters:
      - (a) First day of attendance Roster
      - (b) Student disenrollment Roster
      - (c) Graduation Roster
    - (6) Evaluations, Levels 1-3 per Reference (c):
      - (a) Level 1 Results
      - (b) Level 2 Results
      - (c) Level 3 Surveys for students and supervisors
  - g. Commercially contracted “C” school courses’ contracts must be closed out at the end of their life cycle by a representative of the Formal Contracts Division within the Office of Acquisition Workforce Management (CG-921), and all databases must be updated accordingly.
15. FUNDING. AFC-56 funds must be used to procure commercial “C” school courses per Reference (d).
16. FORMS/REPORTS. None.

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17. REQUEST FOR CHANGES. Submit change requests to [https://cg.portal.uscg.mil/units/forcecom/Training/FC-T\\_Policy/SitePages/Policy.aspx](https://cg.portal.uscg.mil/units/forcecom/Training/FC-T_Policy/SitePages/Policy.aspx);  
ATTN: Training Division (FC-T) Policy.

B. K. PENOYER /s/  
Rear Admiral, U. S. Coast Guard  
FORCECOM

Enclosure (1) Commercially Contracted “C” School Timelines and Processes

# Commercially Contracted "C" School Timelines and Processes

# Commercially Contracted "C" School Timelines and Processes

## Initiating and Renewing Contracts

KO, KS, PM, and RM attend the Procurement Planning Conference

PM Writes an acquisition plan

KS Initiates package and writes course number in all correspondences and databases in addition to the service provided (ex. CN:542368 Oil Spill)

5 days

COR writes the PWS or SOW with the CM and completes the package

5 days

KS assesses package for compliance

No

Package Complete?

Yes

KS and COR receives PR and package

Legal review 30-60 days

KO and COR solicit bids

KO and COR make decision

Works with PSB POC to ensure accuracy of sections 5 and 6 of the PWS

CM writes the PWS or SOW with the COR

5 days

RM -- Contract Funded RM processes purchase request for contract or SF182 (assigns a number to SF182 and identifies the course by number) and releases funds within 10 days of receiving the PR

## Workflow and Life Cycle Management

KO Contract Awarded (New/Renewed)

5 days

KO Informs RM, TM, and COR of award, then, forwards contract documentation to KS

5 days

KS Forwards contract documentation to RM, TM, CM, COR

5 days

RM updates the financial database

TM manages commercially contracted "C" school course; monitors DA and TQMS

COR establishes communication with vendors and all stakeholders involved in contract management

CM builds course sessions, states out of cycle requests, and provides logistics

Within 30 days for simple contracts  
Within 45 days for complex contracts  
Note: PM/CM programs annual throughput requirements in accordance with "C" School build

Continued

Vendor Prepares deliverables prior to course convening

15 days

Deliverables acceptable?

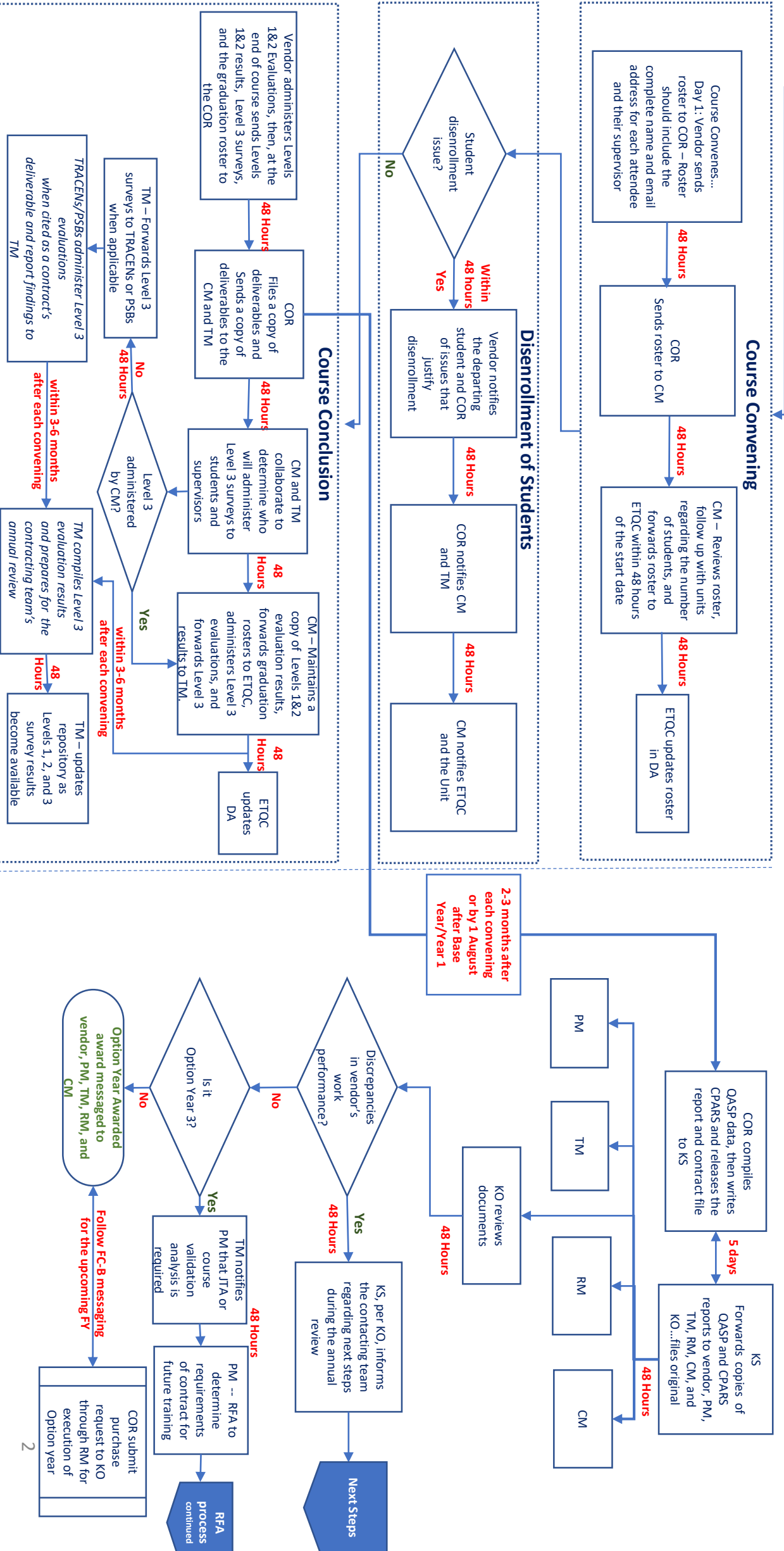
Yes

No

(5 days to resolve)

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