

Previously on Apogee Consulting, Inc.:

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We [noted](#) that DoD had issued a draft Commercial Item Handbook (version 2.0).

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We [discussed](#) a proposed rule regarding how contracting officers should make Commercial Item Determinations (CIDs).

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We [reviewed](#) a revised proposed rule (same topic) and noted some improvements.

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We [told you](#) about a DPAP Memo announcing the creation of six (6) Commercial Item Centers of Excellence, each “staffed with a cadre of engineers and price/cost analysts to advise” COs in how to make commercial item determinations. The six CoE’s (located in Tampa Bay, Denver, Indianapolis, Phoenix, Boston, and Philadelphia) are collectively known as the [Commercial Item Group](#) (CIG). That policy Memo clearly stated that “the responsibility for commercial item determinations remains a PCO responsibility.”

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We [reported](#) that a final DFARS rule had been issued and that DoD had (finally) issued its Commercial Items Handbook (version 2.0). The final version—issued literally *ni*
ne years
after the draft had been published—came in two volumes (“Commercial Item Determination”

CID Authority Centralized in DCMA CIG

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Monday, 14 January 2019 00:00 - Last Updated Sunday, 13 January 2019 07:43

and “Commercial Item Pricing”), and we provided a link to that new Handbook, which was now called a Guidebook.

Now we present:

On December 20, 2018, the Acting Principal Director, DoD Defense Pricing and Contracting, [is sued](#) a short policy Memo that stated “effective immediately, DCMA CIG Contracting Officers will serve as determining officials for all commercial item review requests submitted to DCMA. ... Determinations by the CIG will relieve buying activity Procuring Contracting Officers (PCO) from duplicating effort expended reviewing the CIG recommendations to determine whether an item meets the FAR 2.101 definition of ‘commercial item’ as well as provide consistency in the commerciality review process.”

Thus, the responsibility for commercial item determinations (CIDs) has been transferred from the DCMA PCOs to the DCMA CIG COs. (*Acronym soup for the win*, right?) The CIG COs will make the call on the CIDs, and that call is final.

Is this a good thing? It depends. Those of us who’ve dealt with the reluctance of DCMA PCOs to make a decision might well think it is a good thing, whereas those of us who’ve been able to sail through a local CID might not look forward to having the “pros from Dover” reviewing the commerciality supporting documentation with a fine-toothed comb. Given the “unevenness” of expertise throughout the PCO ranks, we probably tend to bias towards the “good news” side of the spectrum.

Of course, your mileage may vary.