A Conceptual Model for Urgent Acquisition Programs

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Abstract

When the Secretary of Defense, combatant commander, or combat unit in theater determines an immediate capability need, the Department of Defense (DoD) and its acquisition community pushes bureaucracy aside to support the warfighter. The requirements process changes from a Joint Capabilities Integration and Development System to an Operational Needs Statement or Joint Urgent Operational Needs Statement. Urgent acquisition policy focuses on getting capability to the field. Yet, when an urgent capability is determined to be so successful and so useful that it should be fielded across an entire Service, there is no formal transition process. In July 2016, the Under Secretary of Defense for Acquisition, Technology, and Logistics wrote, "DoD Instruction (DoDI) 5000 series guidance does not address the process of the transition of QRCs to PORs" (Kendall, 2016, p. 5). This study advances a model for urgent acquisition that can inform DoDI 5000.02 with respect to establishing needed processes for transitioning urgent acquisition initiatives into programs of record. The review of policy and literature has led to the creation of a potential program model for urgent acquisition transition. This model may serve as a template to support further professional discussion with the hope of helping program managers avoid inefficiencies and incorporating the results into DoD 5000.02 policy.

Chapter 1 – Introduction

Background

Since 2001, the start of the global war on terrorism, the acquisition community has focused on providing quick reaction capabilities (QRC) to warfighting units in theater. Some of this equipment is found to be so effective that it is worth keeping and fielding to the entire Service. The Service would like to keep it to fill a permanent capability gap within specific acquisition portfolios. When a Service decides that a QRC is worth keeping, the capability must transition and become a formal program of record (POR). For years the Department of Defense (DoD) has struggled with how to execute this transition.

The DoD continuously sets priorities for the acquisition community. The last 60 years of history show three broad examples of priority reset. Welby (2016), Assistant Secretary of Defense for Research and Engineering, outlined these examples in a recent statement before a United States Senate subcommittee. He stated that the First Offset strategy, in the 1950s, focused on U.S. nuclear superiority to overcome Warsaw Pact numerical advantages. The Second Offset strategy, in the 1970s and 1980s, looked at a new approach to joint operations. Today, the Third Offset strategy is focused in six distinct areas to strengthen our armed Services against adversarial investment in anti-access/area denial capabilities. The world has changed, the threats to our nation have changed, and that causes DoD priorities and policy to change. As an example, from 1971 to 2017, DoD Instruction (DoDI) 5000.02 has been updated 14 times, and the January 2017 version changed twice by February 2017. Yet with all its focus on tailoring program models, the DoDI 5000 series guidance lacks a program model to assist with the transition of urgent acquisitions.

Problem Statement

The process to equip a unit with a QRC is known and documented in DoDI 5000.02, Enclosure 13 (DoD, 2017b). The process for fielding a POR is also known and documented in DoDI 5000.02. The organizations focused on urgent acquisition are known. The policy for determining whether a QRC is to become a POR is known. But when a program manager (PM) is given the mission to transition an urgent acquisition program to a formal POR, processes are misaligned. The effort to complete this transition mission is *ad hoc*. The requirements process is inefficient when transitioning from an Operational Needs Statement (ONS) or Joint Urgent Operational Needs Statement (JUONS) to a Joint Capabilities Integration and Development System (JCIDS). The Planning, Programming, Budgeting, and Execution System (PPBES) processes are not synchronized. A QRC does not typically have a Program Objective Memorandum (POM) funding line to support resource allocation decisions. The acquisition community begins developing the litany of documents gathered in the Milestone Documentation Identification (MDID) portal that Defense Acquisition University (DAU) sponsors. Can the existing but disparate information be pulled together to create a program model formalizing an urgent acquisition process and shaping a path for PMs given this transition mission?

Purpose of This Study

The purpose of this study is to review a body of knowledge about urgent acquisition and to advance novel concepts for transitioning urgent initiatives to formal PORs. This study will review applicable instructions, regulations, policy, and articles in an effort to provide PMs with guidance when transitioning a QRC to POR status while supporting continued discussion of urgent acquisition.

Significance of This Research

Numerous research projects have suggested that DoD develop a model for urgent acquisition while maintaining the current traditional acquisition process. This study examines the possibility of putting the pieces together and creating a conceptual program model for urgent acquisition. This adds to the body of urgent acquisition knowledge. It potentially provides a road map for a PM to navigate when given the mission to transition a QRC to a POR. This study examines implications for the defense management functions—JCIDS, the Defense Acquisition System (DAS), and the PPBES processes—in order to offer alignment possibilities.

Overview of Research Methodology

Using a descriptive research methodology, this study attempts to outline the facts, characteristics, and relationships associated with urgent acquisition and the transition of a QRC to a formal POR. The research focuses on three areas. First is a search of information about the documentation differences between an urgent capability-equipping effort and a POR fielding effort. Second is a search to understand the organizations involved with urgent acquisition and their missions. Third is a search for information about acquisition reform and DoD policy.

The intent is to answer the following question. Given the QRC and POR literature, can we create a tailored DoDI 5000.02 model for urgent acquisition that will help programs charged with this mission to select the necessary documentation to complete the transition effectively and efficiently? For this research project, the hypothesis is that studying the required fielding documents, the organizations involved with urgent acquisition, and literature on current policy will enable the formulation of transition recommendations and a potential model for the urgent acquisition transition process to complement DoDI 5000.02 Enclosure 13 (Urgent Capability Acquisition).

Limitations

This strategic research paper is limited to a look at three aspects of acquisition: policy, organizations involved in urgent acquisition, and acquisition programs. This focus on the larger process aspects excludes a review of supporting processes that have potential second- and third-order effects. Some of the complementary areas are contracting, systems engineering, test and evaluation, manufacturing and production, and aspects of logistics management.

Two study constraints and one study assumption need to be recognized. The first constraint is due to program-specific databases or storage areas. Many of the challenges faced by urgent acquisition programs when transitioned to a POR are not easily accessible or available from an enterprise level. The second constraint is that the study conclusions are based on published reports and articles, without interviews or surveys, increasing the chance that unknown variables could affect the conclusions. The assumption is that the published literature review is sufficient to perform the study.

Chapter 2 – Literature Review

This literature review was framed to locate evidence and assist with the understanding of urgent acquisition, specifically a QRC transition to a POR. The review should facilitate an understanding of the research that has already been conducted. The literature amassed includes instructions, regulations, and policies; Government Accountability Office (GAO) reports; articles; and research papers. These documents provide the evidence used to support the study's problem statement from three facets: policy, organization, and program documentation challenges.

Instructions, Regulations, and Policies

Department of Defense Instruction (DoDI) 5000.02 Change 2 (DoD, 2017b). This instruction's subject is "Operation of the Defense Acquisition System." It is the guide for managing acquisition programs. In paragraph 5, "Procedures," there is a sub-section that outlines the different "Defense Acquisition Program Models." Enclosure 13 of this instruction covers "Urgent Capability Acquisition."

Army Regulation (AR) 71-9, Warfighting Capabilities Determination (Department of the Army, 2009). The purpose of AR 71-9 is as follows: "This regulation establishes policies and assigns responsibilities for the identification, determination, and integration of required warfighting capabilities. It applies to the validation and approval of capabilities supporting deliberate force modernization planning and the urgent needs of operational commanders. This regulation implements the Joint Capabilities Integration and Development System (JCIDS) within the Department of the Army" (p. 1).

Army Regulation 73-1, Test and Evaluation Policy (Department of the Army, 2016). The purpose of AR 73-1 is as follows: "This regulation implements the policies and procedures

of Department of Defense directive (DoDD) 5000.01, DoDD 3200.11, Department of Defense instruction (DoDI) 5000.02, and Joint Capabilities Integration and Development System (JCIDS) Manual by specifically prescribing implementing policies and assigning responsibilities for test and evaluation (T&E) activities performed within the Army acquisition system" (p. 1). There are three specific sections of interest: "3–12. Test and evaluation in support of nonstandard equipment; 3–13. Test and evaluation in support of accelerated (rapid) acquisition; and 3–14. Test and evaluation in support of agile capabilities life cycle process."

"Department of the Army Memorandum: Interim Policy Memorandum: Nonstandard Equipment (NSE) Army Requirements Oversight Council (AROC) Process" (Anderson, 2015). This document makes AROC "the means for evaluating NSE assets as potential enduring capabilities for the Army," replacing the Capabilities Development for Rapid Transition (CDRT) process, and "appoints the Director, Capabilities Integration, Prioritization and Analysis (DAMO-CI) as the disposition official providing disposition recommendation to the AROC."

"FY17 National Defense Appropriations Act (NDAA) Section 801 Assessment" (DoD, 2017a). This document compiled information about different sections of the NDAA. The Section 801 Assessment on Rapid Acquisition Authority (RAA) provided the Secretary of Defense and Deputy Secretary of Defense with authority to determine whether RAA funds are necessary to initiate rapid fielding or rapid prototyping.

"Technology Readiness Assessment (TRA) Guidance" (DoD, 2011b). This document outlined the purposes of the TRA as follows: "…(1) to provide the PM with a comprehensive assessment of technical risk, and (2) to support the ASD(R&E)'s independent assessment of the risk associated with the technologies incorporated in the program—including whether the

technologies of the program have been demonstrated in a relevant environment—so that the MDA is informed as to whether certification under 10 U.S.C. §2366b can be accomplished, whether a waiver is appropriate, and whether risk-mitigation plans are adequate." It provided the Technology Readiness Level (TRL) definitions and descriptions.

"Manufacturing Readiness Level (MRL) Deskbook" (DoD, 2011a). This document provided MRL definitions, creating a measurement scale that would serve the same purpose for manufacturing readiness as TRLs serve for technology readiness: a common metric and vocabulary for assessing and discussing manufacturing maturity and risk. MRLs were designed with a numbering system roughly congruent with comparable levels of TRLs for the sake of synergy and ease of understanding and use.

GAO Reports

"Warfighter Support: DOD's Urgent Needs Processes Need a More Comprehensive Approach and Evaluation for Potential Consolidation" (GAO, 2011). This report gave an overview of DoD's efforts from 1986 through 2011 to develop and equip capabilities for a warfighting unit. It explained the timeline of significant events, activities, and entities involved in meeting urgent needs and clarified the focus of DoD organizations in supporting urgent needs. It did not include the most recent 2017 updates.

"Force Structure: Army and Marine Corps Efforts to Review Nonstandard Equipment for Future Usefulness" (GAO, 2012). This GAO report provides a status of the Capabilities Development for Rapid Transition (CDRT) process as of 2011. It provides the percent of nonstandard equipment (or quick reaction capabilities) that the Army and Marine Corps have decided is worth keeping and fielding across their service.

"Acquisition Reform: DOD Should Streamline Its Decision-Making Process for Weapon Systems to Reduce Inefficiencies" (GAO, 2015). This report reviewed a number of programs that had a milestone decision since 2011 in order to understand the time it took to staff each document required for a milestone decision. In addition, based on responses from PMs, program executive officers, acquisition executives, and Office of the Secretary of Defense organizations, it divided each required milestone document into one of three categories: high value, moderate value, and less than moderate value. The report also offered some insight on regulatory waivers.

Articles and Research Papers

"Beyond QRC: Long-term Implications of the Army's Quick Reaction Capability Paradigm" (McCullough, 2013). The article gave a summary of the research that was conducted and made a few recommendations based on its findings.

"Path from Urgent Operational Need to Program of Record" (Whaley & Steward, 2014). This article provided some insight into the urgent needs process and compared it to the formal JCIDS process. It took a look at some of the organizations involved in the urgent needs process and used a few case studies. The author drew some conclusions and made recommendations for improvement.

"Ground Truth Harnessing Lessons Learned Through Better Buying Power Initiatives" (Cayce-Adams, 2015). This article described a number of lessons learned and supported the Army Acquisition Lessons Learned Portal. A section titled "Eliminate Unproductive Processes and Bureaucracy" may be applicable to this research topic.

"Improving Acquisition from Within: Suggestions from our PEOs" (Kendall, 2016). In this article Mr. Kendall stated that the QRC model is not sustainable, nor aligned with the

POM, and that there are issues with testing and milestone decisions. He also stated that "the DoD Instruction 5000 series guidance does not address the process of the transition of QRC to POR."

"Army Launches Rapid Capabilities Office" (Stadler, 2016). This web article announced the creation of the newest Army office with a focus on rapid acquisition. It talked about how this new office differs from some other organizations that focus on rapid acquisition.

"Strategic Portfolio Analysis Review" (Deputy Chief of Staff G-8, 2016). This web article provided information about the new Strategic Portfolio Analysis Review (SPAR). "The SPAR's in-depth analysis will inform senior leader decisions when prioritizing capability and technology investments that will shape the future force" (p. 1).

"Rapid Acquisition" (Chyma, 2010). This is a research paper of Senior Service College Fellow, COL Timothy Chyma. Chyma described the three formal processes that affect a capability: the JCIDS, DAS, and PPBES. "The work attempts to answer the question of should there be two different processes: one for deliberate acquisition and the other for rapid acquisition."

"Lessons Learned from Rapid Acquisition: Better, Faster, Cheaper?" (Rasch, 2011). This document is the strategy research project of COL Rasch from the Center for Strategic Leadership at the U. S. Army War College. The paper provided information about the Army's rapid acquisition process and used the Mine Resistance Ambush Protected program as a case study for success. The work touches on the ONS and JUONS requirements processes. It introduces some of the organizations involved with rapid acquisition and briefly explains the CDRT process. It also covers some challenges with rapid acquisition and the DoD budgeting process.

"Third Offset Technology Strategy" (Welby, 2016). This statement defined an offset. It expounded on the first two offset strategies using the when and why of history to set the stage for an explanation on the current and emerging threats. It covered concerns with Russia and China and shaped discussion on what our future focus should be. This study is relevant because it exemplifies changing priorities and the need to keep up with emerging threats—realities that affect the defense management process.

"The Next Acquisition Challenge: Transitioning Enduring Capability" (Wizner, 2013). This is a civilian research project of LTC Wizner, from the University of Texas in 2013. Wizner's work discussed how the rapid acquisition begins with ONS and JUONS. He also provided information on the Capabilities Development for Rapid Transition process, which determines whether a rapid capability will become an acquisition program candidate and ultimately a POR.

"An Analysis of Army Rapid Acquisition" (Coleman, Lopez, Luntz, 2015). This is a research paper of a Naval Postgraduate School joint applied project. The research was intended to determine whether a repeatable process for rapid acquisition is supported by current regulations. The research recommended a formal, rather than *ad hoc,* process for rapid acquisition.

"Fulfillment of Urgent Operational Needs" (Defense Science Board, 2009). This report provided information on the current urgent operational needs processes. The report discussed the sustainability of organizations focused on rapid acquisition and some institutional barriers to rapid acquisition that need to be addressed.

"Tailoring the Acquisition Process in the U.S. Department of Defense" (McKernan, Drezner, & Sollinger, 2015). This was research conducted by the RAND Corporation, intended to begin to answer five key questions regarding the use of tailoring:

(1) Is tailoring practical and possible? (2) What are the constraints that make tailoring a challenge? (3) Are there examples of tailoring that demonstrate its usefulness and feasibility? (4) What set of skills or resources needs to be available to program managers for tailoring to be successful? (5) What other conditions need to exist for tailoring to be effective? (p. iv)

"Streamlined Acquisition Strategy Development Workshop" (DAU, 2017). The Streamlined Acquisition Strategy Development Workshop (WSM 014) is conducted by the Defense Acquisition University as a facilitated workshop that addresses key content areas of the acquisition strategy, assisting program teams in developing their technical, business, and supportability strategies. Module 7 of the workshop focuses on phasing and tailoring, including an assessment of program cycle time and streamlining tasks and documents.

"Experiment, Evolve and Deliver" (Army Rapid Capabilities Office (ARCO), 2016). The ARCO website gives an unclassified description of what the ARCO was created to do and who it reports to. It outlines how ARCO is different and how it reaches out to a broader community early and often to streamline acquisition.

Summary

The current body of literature reviewed provides information in three areas: program information requirements, organizations, and policy. In the area of information requirements, a large required documentation difference exists between a QRC equipping decision and a POR fielding decision. Many organizations are charged with supporting urgent acquisition. Policy has

bifurcated traditional and urgent acquisition. However, there is no document in the review that attempts to explain transition, the part of the urgent process that couples to the traditional process. This study pieces the disparate literature together to determine whether the literature provides enough information to create a conceptual program model for urgent acquisition. Such a model would advance DoDI 5000.02 with respect to establishing needed processes for transitioning urgent acquisition initiatives into PORs. It could be used as a starting point for DoD senior acquisition leader discussion and could help a milestone decision authority (MDA) decide how to tailor the program model to transition an urgent acquisition capability to an enduring capability.

Chapter 3 – Research Methodology

Research Question

Given QRC and POR literature, can we create a tailored DoDI 5000.02 model for urgent acquisition that will help programs charged with this mission to select the necessary documentation to complete the transition effectively and efficiently?

Research Hypothesis

For this research project, the null hypothesis (H_0) is that studying the required fielding documents, the organizations involved with urgent acquisition, and literature on current policy will enable the formulation of transition recommendations and a potential urgent acquisition transition process model to complement DoDI 5000.02 Enclosure 13, Urgent Capability Acquisition.

Therefore, the alternative hypothesis (H_1) is that studying the required fielding documents, the organizations involved with urgent acquisition, and literature on current policy will not enable the formulation of transition recommendations and a potential model for the urgent acquisition transition process to complement DoDI 5000.02 Enclosure 13, Urgent Capability Acquisition.

Research Design

Using a descriptive research methodology will support the outline of the facts, characteristics, and relationships associated with urgent acquisition and the transition of a QRC to a formal POR.

Bias and Error

Typically, alternative methods of data collection like interviews and questionnaires are used to avoid bias and error. In this study, alternative methods were not incorporated. The

literature search is the sole method of data collection. This single style of data collection raises

bias, validity, and reliability concerns. To mediate these concerns, the study is not be based

solely on the author's acquisition experience and interpretation. The author uses feedback from

multiple acquisition subject matter experts, all serving in the Senior Executive Service. This will

shape the starting point for additional discussion on formalizing the urgent acquisition transition

process and mitigate any research influence imposed by the author.

Chapter 4 – Findings

This chapter draws conclusions from the literature to develop a potential program model

for urgent acquisition transition to a POR. A subject matter expert review by senior acquisition

members was used to confirm the conclusions as reasonable. For the purpose of this paper there

is a difference between the terms "equip" and "field." DoD will equip a specific unit with a piece

of equipment, a QRC, based on an ONS or JUONS. DoD will field an entire service with a piece

of equipment, a POR, based on a JCIDS-approved document. The literature in this study uses the

terms "quick reaction capability," "rapid acquisition" and "urgent acquisition." Since the current

DoDI 5000.02 changed Enclosure 13 from "Rapid Fielding of Capabilities" to "Urgent

Capability Acquisition," this study uses the term "urgent acquisition." The urgent capability

itself will be called a QRC.

Collected Data

     Policy-level review. The acquisition community concerns itself with the defense

management functions and its three formal processes: "The Joint Capabilities Integration and

Development System (JCIDS); the Planning, Programming, Budgeting and Execution System

(PPBES); and the Defense Acquisition System" (Chyma, 2010, p. iii).

The requirements process is driven by JCIDS for deliberate acquisition and an ONS or

JUONS for an urgent acquisition. If a Service decides that an urgent acquisition program should

become an enduring capability, in other words a formal POR, "[t]he enduring requirement APC

(Acquisition Program Candidate) will need to meet the required elements of the DoD 5000

series…" (Whaley & Stewart, 2014, p. 555), and AR 71-9 clearly states that "[t]he CDRT

process may reduce the JCIDS document development cycle" (Department of Defense, 2009,

p. 27). In 2015, the CDRT process was replaced by the Nonstandard Equipment (NSE) Army Requirements Oversight Council (AROC; Anderson, 2015).

From a budget perspective, the truth remains that "Bottom line: if the program is not in the POM, it is not a program" (Chyma, 2010, p. 9). Formal PORs are managed and have a POM submission. An urgent acquisition is typically funded for the equipping effort, which does not include funding for things like Service-wide production, training, or sustainment. In an AROC memorandum (AROCM; Anderson, 2015), the Army clearly stated that the purpose of its 2015 NSE AROC policy is to serve as the Army's disposition authority aligning funds for an urgent acquisition effort. The Army's 2016 SPAR attempts to align resources at the Senior Army Leader level (Deputy Chief of Staff, G-8, 2016, p. 1) The deliberate acquisition process aligns PPBES with the DAS as it moves through its milestone decisions. The Army has recently created the NSE AROC and SPAR events, which are intended to improve urgent acquisition and ensure that a disposition decision to transition is aligned with funding resources.

The primary policy guidance governing DoD acquisition is DoDI 5000.02. The DoDI 5000.02 has been volatile, becoming more and more complex and expansive over the past four decades. In 1971, DoD issued its initial 5000 acquisition policy. The policy, which totaled seven pages, provided for minimum formal reporting and more streamlined layers of authority than the complex process in place today (GAO, 2015, p. 21). DoD has updated the 5000 process at least 14 times since inception. It has gone from seven pages to 840 pages, and the DoDI 5000.02 is currently 188 pages. It has required anywhere from one to 50 documents to support a milestone decision. Currently, "DOD's revised acquisition policy has placed greater emphasis on 'tailoring,' which means modifying the traditional acquisition process, including documentation

and reviews, to best suit a program's needs" (GAO, 2015, p. 20). Most of these changes have focused on building a new product from concept to fielding through final disposition.

The current DoDI 5000.02 guides the acquisition process through three major program milestones. It starts with Milestone A (MS A), defining it as a Risk Reduction Decision for technology maturation and risk reduction. Next is Milestone B (MS B), "…the critical decision point in an acquisition program because it commits the organization's resources to a specific product, budget profile, choice of suppliers, contract terms, schedule, and sequence of events leading to production and fielding" (DoDI 5000.02, 2017b, p. 8). The final milestone is Milestone C (MS C), a decision to enter production through both the Low-Rate Initial Production and the Full-Rate Production or Full Deployment Decision. MS C follows development and testing. Aligning these three processes is difficult since each has a different driver. The JCIDS process is needs based, the PPBES process is calendar based, and DAS is event based.

Yet, "[o]ne of the truths of the last 50 years of acquisition practice is that whenever the military really needed something it bypasses the traditional acquisition process and uses a more streamlined approach" (Coleman et al., 2015, p.11). The current 2017 NDAA Impact Paper assessing Section 801 includes "a provision in the Rapid Acquisition Authority (RAA) language to allow use of the RAA provisions if the SecDef or DepSecDef determine that funds are necessary to immediately initiate a project under the rapid fielding or rapid prototyping acquisition pathways under section 804 of the National Defense Authorization Act for Fiscal Year 2016." (DoD, 2017a, p. 1)

DoDI 5000.02 Enclosure 13, Urgent Capability Acquisition, provides guidance defining three statutory documents necessary to equip a unit with a QRC: an assessment approach, a course of action analysis, and a rapid acquisition authority (RAA) recommendation. The

acquisition activities described in the enclosure "are a highly tailored version of [the activities performed as part of the acquisition system] and are intended to expedite the fielding of capability by tailoring the documentation and reviews normally required as part of the deliberate acquisition process" (DoD, 2017b, p. 162). An acquisition strategy is also required. AR 73-1 provides guidance that states, "ATEC [Army Test and Evaluation Command] develops and provides decision makers and Soldiers with a Capabilities and Limitations (C&L) Report, which provides essential information to assist them in making an informed decision regarding equipping, employment, and potential future acquisition decisions. An ATEC safety confirmation is provided concurrently with the C&L Report" (Department of the Army, 2016, p. 23). Urgent acquisition policy remains focused on getting capability to the field. It lacks a solid disposition and transition process.

Organizational-level review. "Over the past two decades, the fulfillment of urgent needs has evolved as a set of complex processes…to rapidly develop, equip, and field solutions and critical capabilities to the warfighter" (GAO, 2011, p. 6). "DOD's 2010 Quadrennial Defense Review cited that the department's institutions and processes needed reforms to better support the urgent needs of the warfighter; buy weapons that are usable, affordable, and truly needed; and ensure that taxpayer dollars are spent wisely and responsibly" (GAO, 2011, p. 2). A Defense Science Board report in 2009 stated that DoD "identified more than 20 organizations, processes, and funds with the purpose to address warfighter needs rapidly" (p. 17). A GAO report in 2011, "identified at least 31 entities that manage urgent needs and expedite the development of solutions to address them" (GAO, 2011, p. i). See Appendix A for a list of the entities involved with urgent acquisition pulled from the 2011 GAO report.

"The Army established the Rapid Capabilities Office in August 2016 at the direction of the Secretary of the Army" (Assistant Secretary of the Army for Acquisition, Logistics, and Technology, 2016). "The Army Rapid Capabilities Office serves to expedite critical capabilities to the field to meet Combatant Commanders' needs. The Office enables the Army to experiment, evolve and deliver technologies in real time to address both urgent and emerging threats, while supporting acquisition reform efforts. ARCO reports to a Board of Directors led by the Secretary of the Army, and including the Chief of Staff of the Army and the Army Acquisition Executive" (Army Rapid Capabilities Office, n.d.).

The 2011 GAO report identified which organizations were involved with the activity of transition, transfer, or termination defined as

> The decision regarding the final disposition of the capability in terms of whether it will
> be (1) transitioned to a program of record if it addresses an enduring capability need, (2)
> transferred to an interim sponsor for temporary funding if it addresses a temporary
> capability that is not enduring but needs to be maintained for some period, or (3)
> terminated if it addresses a niche capability that is not enduring, nor is it to be maintained
> for current operations. (p. 10)

This GAO report found that only 9 of the 31 entities actually considered transition as part of their mission. When roughly one-third of the organizations assigned an urgent acquisition mission are involved with a transition disposition decision, it is not surprising that there is no formal disposition process.

Additionally, the timeline in making a disposition decision is not standard:

> It is JIEDDO's [Joint Improvised Explosive Device Defeat Organization] policy to decide
> within 2 years whether to transition or transfer the capability over to a service or agency

or to terminate it....The Special Operations Command determines at the 1-year mark whether the capability is still needed in-theater, and if so, defines out-year funding requirements and how the funding will be obtained. (GAO, 2011, p. 23)

The Army instituted a process to correct this gap. They used the Capabilities Development for Rapid Transition (CDRT) process to make the disposition decision until 2015 when they initiated the NSE AROC process. The NSE AROC disposition decision creates an AROCM, which "captures decisions made, assigns taskings and responsibilities, establishes a source for future requirements determination and initiates other actions, such as the resourcing process" (Anderson, 2015, p 2). However, there is no formal disposition decision codified in DoD policy outlining organizational involvement

Program-level review. For more than a decade DoD has been engaged in the global war on terror, the fighting in Afghanistan and Iraq. These engagements caused DoD to change tactics. It was not fighting the large force-on-force battles associated with the combined arms maneuver missions of World War II or even the first Iraqi War. It was in a counterinsurgency fight, implementing Wide Area Security missions. This completely new environment needed new capabilities quickly to support units in contact in combat areas. DoD responded with quick reaction capabilities using an urgent acquisition approach. Policy was written and organizations were created, but what happened at the program level? After everything was in the field, how much of this new equipment was actually being transitioned to the Army as an enduring capability for the entire Service?

During the time frame when DoD had the highest troop levels in theater and the acquisition community was heavily involved with implementing urgent acquisition, "Very few Army Quick Reaction Capabilities actually transitioned" (Wizner, 2013, p. 14). As of October

2012, after 14 CDRT iterations, only 34 of 657 Army QRCs, or 5.17 percent, received the disposition decision to transition to a POR. At the same time, from 2008 to 2012, the Marine Corps had 144 urgent needs, transitioning 90, or 62.5 percent, to a POR (GAO, 2012). So why is the topic still at the forefront of senior acquisition leaders? The answer is a change in priorities, emerging threats, and the need to have guidance in place to cope with these changes.

DoDI 5000.02's Enclosure 13 provides guidance defining three statuary documents necessary to equip a unit with a QRC: an assessment approach, a course of action analysis, and an RAA recommendation. It lists one regulatory document: a disposition authority's report to the DoD component head. The acquisition activities described in the enclosure "are a highly tailored version of [the activities performed as part of the acquisition system] and are intended to expedite the fielding of capability by tailoring the documentation and reviews normally required as part of the deliberate acquisition process" (DoD, 2017b, p. 162). In the Army, AR 73-1 states, "ATEC develops and provides decision makers and Soldiers with a Capabilities and Limitations (C&L) Report, which provides essential information to assist them in making an informed decision regarding equipping, employment, and potential future acquisition decisions. An ATEC safety confirmation is provided concurrently with the C&L Report." (Department of the Army, 2016, p. 23). That totals six known documents required for an Army urgent capability to acquire an equipping decision.

When a PM receives the mission to transition an urgent capability into a formal POR, they now have to develop the mandatory documentation required of a POR. "A program of record typically tracks and staffs 49 separate documents over eight staffing levels for two years before it is prepared for a milestone decision to field equipment" (GAO, 2015). This 2015 GAO study surveyed program offices, program executive offices, service acquisition executives and

OSD organizations and found that an average of 24 of the 49 documents had high value with an average of 20 having moderate value. Appendix B provides the value assessment of each requirement. For a current list of requirements go to the MDID website hosted by DAU.

Although current acquisition policy calls for tailoring "which means modifying the traditional acquisition process, including documentation and reviews, to best suit a program's needs … obtaining waivers for milestone requirements involves significant time and effort, and that it is often easier to simply complete the requirements rather than try to obtain waivers" (GAO, 2015, p. 21). "Early planning with milestone decision authority (MDA) acquisition policy staff can provide an opportunity for tailoring documentation requirements to remove those that add little value or are not applicable to the program" (Cayce-Adams, 2015, p 127). In support of tailoring documentation, Appendix B provides the GAO 2015 report results that rate the value of each milestone document based on opinions of acquisition professionals at multiple levels.

Analysis

    Policy-level analysis. Threats to the United States evolve over time, and the timelines to ensure DoD can thwart these threats vary. Some allow for years of development, and others will be needed as soon as possible. Acquisition policy will likely remain in a state of flux, with the need to bypass traditional acquisition to get things done quicker remaining a constant. "Recognizing this reality is the first step in building an acquisition system that works. Acknowledging this truth, we must consider establishing a repeatable and manageable 'bypass' to the current acquisition process" (Coleman et al., 2015 p. 11). Army policy changes in 2015 improved alignment of the Defense management functions. Policy coupled with the urgent acquisition body of literature has enough information to create a potential program model to further the professional conversation in this area.

Organizational-level analysis. DoD has made urgent acquisition convoluted, with a myriad of organizations involved in the equipping process. The multitude of organizations creates confusing duplication and most of the organizations are not involved with the urgent acquisition process's disposition decision. The lack of focus and involvement in preparation for a disposition decision is a gap that needs to be filled to improve a transition process.

Program-level analysis. A PM transitioning a QRC to a POR is not building a product, but has a piece of equipment that is typically TRL 9. TRL 9 is defined as an "[a]ctual system proven through successful mission operations" (DoD, 2011b, p. 2-14). The equipment is typically at MRL 8. MRL 8 is defined as "a manufacturing capability that is in place to begin low rate production. This means the design is sufficiently stable to enter into low rate production. Physical and functional interfaces are clearly defined." (DoD, 2011a, p. 2-4). In the acquisition process, however, the equipment is justifiably pre-MS C. Although the concept of tailoring is prevalent throughout DoD 5000, the current acquisition culture expects "100-percent compliance with all elements of policy" (McKernan et al., 2015, p. xii). This makes documentation development among other aspects an overwhelming task for the PM.

Summary

The pieces can be put together to create an initial model for the transition of an urgent capability to POR. The deliberate acquisition process builds a new capability from MS A to MS C. The urgent acquisition process takes an existing piece of equipment and works backwards from MS E to MS C. The pieces support a dual process that converges on MS C.

Chapter 5 – Interpretation

This chapter presents an analysis and attempts to answer the research question: given QRC and POR guidance can we create a tailored DoDI 5000.02 model for urgent acquisition to help programs charged with this mission to select the necessary documentation to complete the transition effectively and efficiently? Recommendations will be made to set the stage for further discussion and potential research on the topic of urgent acquisition.

Conclusions

There has been a continual call for a bifurcated approach to acquisition. For example, in 2009 the Defense Science Board task force issued a report on "Fulfillment of Urgent Operational Needs." In 2011, Rasch wrote, "There needs to be formal acknowledgement and recognition of an alternative acquisition path" (p. 17). In 2013, McCullough stated, "There is a need for acquisition policy-makers to influence the development of acquisition policy so that it clearly defines and articulates the steps relating to QRCs" (p. 49). And in 2016 Kendall wrote, "DoD Instruction (DoDI) 5000 series guidance does not address the process of the transition of QRCs to PORs" (p. 5).

This study shows that current guidance does exist to put the pieces together for Army systems and assists with answering Mr. Kendall's latest assertion. This study makes the recommendation that while the deliberate acquisition process builds from MS A toward MS C the urgent acquisition transition process should work backwards from MS E to MS C. This study recommends that a detailed lexicon be incorporated to codify terminology and process steps. This will alleviate confusion between the deliberate and urgent acquisition processes, which is a necessity.

To successfully transition a QRC to POR, the requirements, budget, and acquisition processes must be aligned. The Army's efforts to align the major processes on requirements, acquisition, and budget through their NSE AROC and SPAR events are a current example that enables a potential program model for urgent acquisition. At the NSE AROC, if the urgent program receives the disposition decision to transition a QRC to POR, an AROCM must designate a Program Executive Office (PEO) to take charge of the new program. If a SPAR decides to keep the rapid program and field it to the Army, the Army acquisition executive or designee would need to create a POR with an acquisition decision memorandum. This should be done at MS D. MS D would be an MDA decision that defines a tailored list of required documentation to meet MS C for the transitioning NSE. With the requirements, acquisition, and budget processes now aligned, the path forward has been shaped for success, and a PM has everything necessary to drive towards MS C. The urgent acquisition transition process would look something like figure 1.

Legend
◇ = Decision Point
△ = Milestone Decision
▯ = Requirements Document
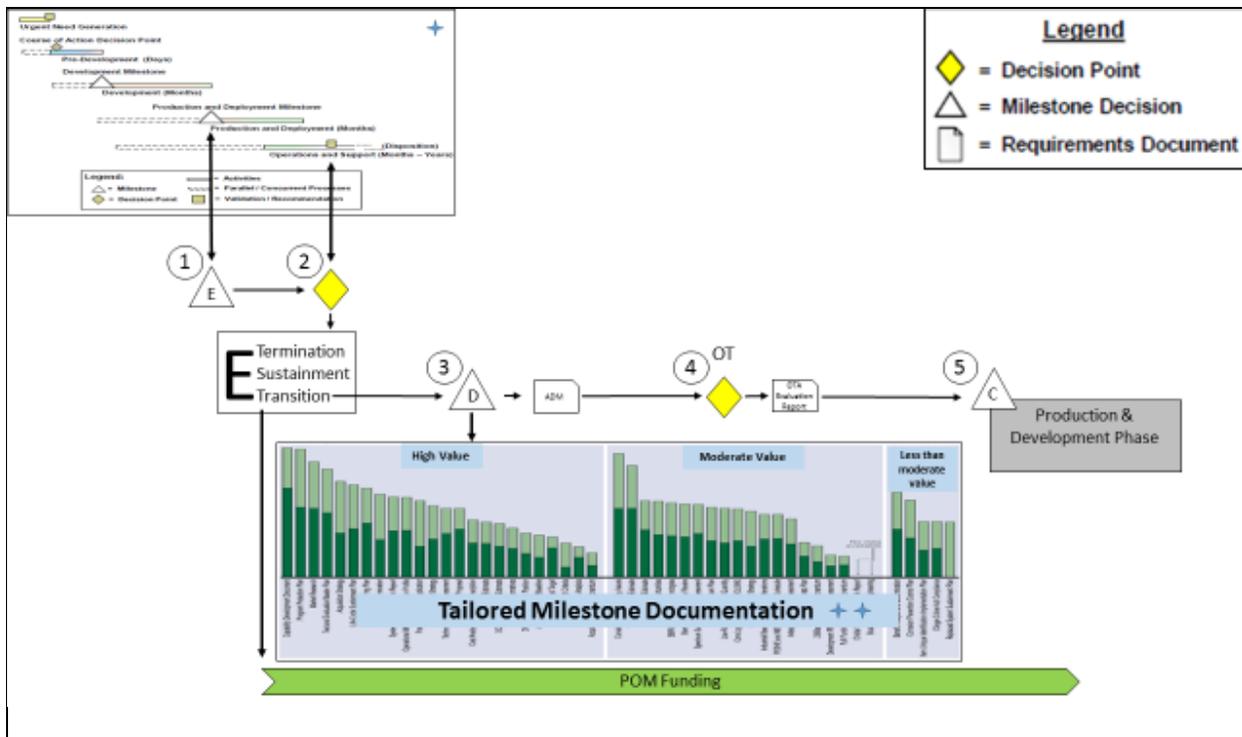
① **MS E:** an MDA decision to Equip a unit with an NSE material solution using a rapid acquisition process. Currently called a P&D decision in DoDI 5000.02 Encl 13

② **Disposition Determination:** No later than 1 year after the program receives a MS E, the DoD Component will conduct a Disposition Analysis which will recommend one of the following options: Termination, Sustainment or Transition. (DoDI 5000.02 encl 13) If the decision is transition, funding must be appropriated. The Army does this through their NSE AROC and SPAR events.

③ **MS D:** an MDA decision with ADM that defines for the transitioning NSE a tailored set of required documentation to meet MS C.

④ **OT:** should be tailored based on data collected on the NSE from the field and include any modifying, integrating, or usability/human factors changes to the system.

⑤ **MS C:** the MDA decision to enter production for both the Low-Rate Initial Production (LRIP) and the Full-Rate Production or Full Deployment Decision.

Notes:
  ✚ Adapted from DoDI 5000.02 Figure 10, Urgent Capability Acquisitions (p. 163)

  ✚✚ Adapted from GAO Report GAO-15-192: Report to Congressional Committees - Acquisition Reform: DOD should streamline its decision-making process for weapon systems to reduce inefficiencies, figure 3 (p. 8)

Figure 1 – Potential Model for Urgent Acquisition Programs

Policy-level Recommendations

Lexicon. This study recommends that different terminology be used with each separate process of the DAS via the concept of precision in language. The deliberate process would use the terms "fielding" and "POR." The intent of the deliberate acquisition process is to field a POR to an entire Service. The urgent process would use the terms "equipping" and "QRC." The intent of the urgent acquisition process is to equip a QRC to a unit. Using the terms "equipping" versus "fielding" and "QRC" versus "POR" creates a lexicon to eliminate confusion about terminology and process within a dual acquisition system. It keeps it simple.

Milestone E. Acquisition policy has formalized both a "deliberate acquisition" process and an "urgent acquisition" process. Following the lexicon recommendation above, the acquisition language must also separate the major decision points of these processes. The deliberate acquisition process begins with MS A, builds through MS B, and ends with MS C. At MS C the program gets a fielding decision for an entire Service, which carries the process through sustainment and final disposition.

The urgent acquisition process begins with an ONS or JUONS and drives towards an equipping decision for a specific unit. In Enclosure 13 of DoDI 5000.02, this decision is called the production and deployment milestone. This study recommends that the milestone be formally named MS E. MS E would be the decision to equip a unit with an NSE material solution using the urgent acquisition process. The equipping decision would be limited to the amount needed to complete the entire requirement under urgency. NSE material is defined as "equipment that has not been type-classified, is not an acquisition program or component of a program, and has typically been procured to support an urgent or emergent operational need" (Anderson, 2015,

p. 2). Changing the name forces the community to separate the two processes: deliberate and urgent. It sets the tone and intent of the two processes. Unlike the deliberate process that builds a new capability from MS A to MS C, the urgent process equips a unit quickly at MS E and if so determined works backward to MS C if the Service needs it as an enduring capability.

Disposition determination. Enclosure 13 of DoDI 5000.02 states that no later than one year after the program receives an MS E, the DoD component will conduct a disposition analysis that will recommend one of the following options: termination, sustainment, or transition (DoD, 2017b). This study recommends that the DoDI should go one step further. The DoD component must also align the PPBES with the DAS appropriating funds to enable the QRC transition to POR. The Army's AROC and SPAR events are current examples of how to align these processes.

Milestone D. The second milestone of this potential urgent capability acquisition process would be MS D, formalizing the decision to transition to a POR. This study recommends that to prepare for an MS D, the PM and staff would focus on tailoring the business, technical, and support strategies and associated documentation. Training from DAU could assist the teams in assessing the full program needs and how best to meet them. DAU has rolled out a new training offering, Streamlined Acquisition Strategy Development Workshops to assist PMs. The workshop defines tailoring as "[p]roposing an alternate means of achieving the same results consistent with meeting all statutory, programmatic/joint requirements and agreements" (Defense Acquisition University, 2017). This workshop is an example of training that could help the PM and team with this task. Another prerequisite to MS D would be for each Service to develop decision points that document the transition of the urgent capability to a new program of record, thus aligning the defense management process for requirements, budget, and acquisition. MS D

would empower the MDA to tailor a number of program aspects: reduce documentation by authorizing waivers, set developmental and operational testing to prepare for a full material release, review contracting, and more. This tailoring effort would minimize what the QRC would have to prepare to reduce program risk wherever possible. The results of MS D would be to create a POR from the QRC and focus this new POR on a path to an MS C fielding decision.

Organizational-level Recommendations

Mandate disposition decision as handoff point. The deficiency addressed here is that organizations involved with urgent acquisition are primarily focused on just getting equipment to the field. These organizations should remain the proponent for the urgent capability until the component level disposition decision point. If the urgent capability is to become an enduring capability, a POR, this decision point becomes the handoff from the urgent acquisition organization to its associated deliberate acquisition organization, typically a PEO.

Mandate data collection to shape testing. Organizations involved with equipping a unit with a QRC should be required to collect developmental and operational data in preparation for the component-level disposition decision. This should be done in conjunction with the appropriate operational test agency (OTA). AR 73-1 already has the Army's OTA, ATEC, writing a C&L report for the production and disposition decision, or MS E. Therefore, understanding the developmental and operational data needed to make a disposition decision and shape a potential operational test should be known. For the Army, this recommendation would supplement the ATEC C&L report and help support and shape the potential operational test needed for an MS C.

Aligning the defense management processes. The Army organizations involved with urgent acquisition should work with the Training and Doctrine Command to codify an updated

capability document to replace the ONS or JUONS. This would successfully shape the requirements process for transition. Army organizations involved with urgent acquisition should work with the appropriate PEO to ensure cost estimates and funding profiles are understood and can be inserted into the PPBES. The Army's Rapid Capabilities Office is a good example: "The Rapid Capabilities Office is a total Army effort that will leverage capabilities and expertise from across the service, especially the Army staff, program executive offices, training and doctrine community, intelligence community and science and technology community" (Stadler, 2016). This would provide information about the QRC to support the component-level disposition decision and shape the operational test needed if the QRC were to transition to a POR.

Limitations of the Study

The main limitation is the mix of the DoDI 5000.02 with Army-only processes and documents. The study did not look at U.S. Navy, U.S. Marine Corps, U.S. Air Force, or industry documents or procedures when conducting the analysis or postulating recommendations. The study does not delve into second- and third-order effects of the complementary areas like: contracting, systems engineering, test and evaluation, manufacturing and production, logistics management, risk management, or waivers. Further study could be done in any of these areas.

There are many areas for further study. For example the study touches on developmental and operational testing and data collection but does not do a deep dive into urgent acquisition testing. The study talks about a required course of action analysis, but does not address when the analysis is performed and by what organization. The study touches on the fact that waivers are difficult to acquire, but does not look into why or how to make that process more efficient. Results of further study in these areas may affect the conclusions in this document.

This study does advance a model of urgent acquisition that can inform DoDI 5000.02 with respect to establishing needed processes for transitioning urgent acquisition initiatives into programs of record.

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Glossary of Acronyms and Terms

AR ....Army Regulation

ARCO ....Army Rapid Capabilities Office

AROC ....Army Requirements Oversight Council

AROCM.........Army Requirements Oversight Council Memorandum

ATEC ....Army Test and Evaluation Command

C&L ....Capabilities and Limitations Report

CDRT.............Capabilities Development for Rapid Transition

DAS................Defense Acquisition System

DAU...............Defense Acquisition University

DoD................Department of Defense

DoDD.............Department of Defense Directive

DoDI ....Department of Defense Instruction

GAO ....Government Accountability Office

H_0 ....null hypothesis

H_1 ....alternate hypothesis

JCIDS.............Joint Capabilities Integration and Development System

JUONS...........Joint Urgent Operational Needs Statement

MDA ....milestone decision authority

MDID.............Milestone Documentation Identification

MRL...............Manufacturing Readiness Level

MS..................Milestone

NDAA............National Defense Appropriations Act

NSE .... nonstandard equipment

ONS .... Operational Needs Statement

OTA .... Operational Test Agency

PEO .... Program Executive Office

PM .... program manager

POM .... Program Objective Memorandum

POR .... program of record

PPBES .... Planning, Programming, Budgeting and Execution System

QRC .... quick reaction capability

RAA .... Rapid Acquisition Authority

SPAR .... Strategic Portfolio Analysis Review

TRL .... Technology Readiness Level

Appendix A – Roles of Urgent Needs Entities in Key Activities

The table listed in this appendix is taken verbatim from the GAO-11-273 report (GAO, 2011)

Table 4: Roles of Urgent Needs Entities in Key Activities

Service/Joint	Entity involved in urgent needs	Validation	Facilitation	Sourcing	Execution	Tracking	Transition, Transfer, or Terminate
OSD or Joint	Joint Staff, J8	☐	☐	☐		☐	
	Intelligence, Surveillance, Reconnaissance Task Force		☐	☐			☐
	Mine Resistant Ambush Protected (vehicle) Task Force		☐	☐		☐	
	Joint Improvised Explosive Device Defeat Organization	☐	☐	☐	☐	☐	☐
	Joint Rapid Acquisition Cell		☐	☐		☐	
	Rapid Fielding Directorate Rapid Reaction Technology Office		☐			☐	
	Joint Capability Technology Demonstration						☐
Army	Deputy Chief of Staff, Army G- 3/5/7, Current and Future Warfighting Capabilities Division	☐	☐	☐		☐	☐
	Biometrics Identity Management Agency		☐	☐		☐	
	Asymmetric Warfare Group		☐				
	Rapid Fielding Initiative				☐		
	Rapid Equipping Force	☐	☐	☐	☐	☐	
	Army Capabilities Integration Center, U.S. Army Training & Doctrine Command					☐	☐
	PM or PEO, such as Night Vision / Reconnaissance, Surveillance, and Target Acquisition (Base Expeditionary Targeting and Surveillance Sensors—Combined) or the Counter Rocket, Artillery, Mortar Program Directorate				☐	☐	
Navy	Chief Naval of Operations N81D	☐	☐	☐		☐	
	U.S. Fleet Forces Command	☐	☐	☐			
	U.S. Pacific Fleet	☐	☐	☐			
	Rapid Action Teams, led by a Chief of Naval Operational Sponsor		☐	☐		☐	☐
	Deputy Assistant Secretary of the Navy, Expeditionary Warfare		☐	☐		☐	
	Rapid Development and Deployment Office				☐	☐	
	PM or PEO, such as PEO Littoral and Mine Warfare				☐	☐	☐

Service/Joint	Entity involved in urgent needs	Validation	Facilitation	Sourcing	Execution	Tracking	Transition, Transfer, or Terminate
Marine Corps							
	Deputy Commandant for Combat Development and Integration, Capabilities Development Directorate a		☐	☐		☐	☐
	PM or PEO, such as PM Light Armored Vehicles		☐		☐	☐	
Air Force							
	Air Combat Command A8XM	☐	☐	☐			
	Air Mobility Command A5QX	☐	☐	☐			
	Requirements Policy & Process Division, Directorate of Operational Capability Requirements		☐	☐		☐	
	Office of the Assistant Secretary of the Air Force for Acquisition, responsible for Air Force Rapid Response Process		☐				
	PM or PEO, such as Aeronautical Systems Center		☐				
Special Operations Command							
	Special Operations Command J8	☐	☐	☐		☐	☐
	Special Operations Research, Development, and Acquisition Center				☐	☐	

Appendix B – Value of Information Requirements Assessed by DoD Organizational Levels

Information in this appendix is recreated from Appendix III: Value of Information Requirements Assessed by DoD Organizational Levels (GAO, 2015). The document may assist with tailoring information requirements for a QRC transitioning to a POR.

Information Requirements	Value Assessments					Time to complete (months)
	Program Offices	Program Executive Offices	Service Acquisition Executives	OSD Organizations	Combined Average	
Capability Development Document	H	H	H	H	H	24
Program Protection Plan	H	H	H	H	H	23
Market Research	H	H	H	H	H	21
Test and Evaluation Master Plan	H	H	H	H	H	20
Acquisition Strategy	H	H	H	H	H	17
Life-Cycle Sustainment Plan	H	H	H	H	H	17
Systems Engineering Plan	M	H	H	H	H	16
Contract-Type Determination	H	H	M	H	H	15
System Threat Assessment Report	M	M	H	H	H	15
Operational Mode Summary/Mission Profile	H	M	H	H	H	15
Frequency Allocation Application (DD Form 1494)	H	M	M	H	H	14
Cybersecurity Strategy	M	H	H	H	H	13
Technology Readiness Assessment	M	H	H	H	H	12
Request for Proposal	H	H	H	H	H	12
Cost Analysis Requirements Description	H	M	H	H	H	10
Independent Cost Estimate	H	H	M	H	H	10
DOD Component Cost Estimate	H	H	M	H	H	10
Analysis of Alternatives	M	H	H	H	H	9
	H = High Value M = Moderate value L = Less than moderate value			Source GAO analysis of DOD data GAO-15-192		

Information Requirements	Value Assessments					Time to complete (months)
	Program Offices	Program Executive Offices	Service Acquisition Executives	OSD Organizations	Combined Average	
DOD Component Cost Position	H	H	M	H	H	8
Should-Cost Target	H	M	H	H	H	7
Exit Criteria	H	H	H	H	H	6
Affordability Analysis	M	H	H	H	H	5
Acquisition Decision Memorandum	H	H	H	H	H	4
Consideration of Technology Issues	M	M	M	M	M	23
Termination Liability Estimate	M	M	L	M	M	20
Manpower Estimate	M	M	L	H	M	14
Cooperative Opportunities	L	M	L	H	M	14
Small Business Innovation Research/Small Business Technology Transfer Program Technologies	M	M	M	M	M	14
Bandwidth Requirements Review	M	M	L	M	M	13
Spectrum Supportability Risk Assessment	M	M	H	M	M	13
Information Support Plan	M	M	M	M	M	13
Low-Rate Initial Production Quantity	H	M	M	H	M	12
Core Logistics Determination/Core Logistics and Sustaining Workloads Estimate	M	M	L	H	M	12
Intellectual Property Strategy	M	M	M	H	M	12
Industrial Base Capabilities Considerations	L	M	M	H	M	11
Programmatic Environment, Safety, and Occupational Health Evaluation and National Environmental Policy Act	M	M	L	M	M	11

Information Requirements	Value Assessments					Time to complete (months)
	Program Offices	Program Executive Offices	Service Acquisition Executives	OSD Organizations	Combined Average	
Independent Logistics Assessment	M	M	M	M	M	11
Life-Cycle Mission Data Plan	M	L	L	H	M	6
2366a/b Certification Memorandum	L	M	L	H	M	6
Development Request for Proposal Release Cost Assessment	M	M	H	H	M	4
Full Funding Certification Memorandum	H	M	M	H	M	4
Orbital Debris Mitigation Risk Report (Space Programs)	H	H	L	H	M	No Data
Business Process Reengineering	M	L	M	H	M	No Data
Benefit Analysis and Determination	L	M	L	M	L	15
Corrosion Prevention Control Plan	M	L	L	M	L	14
Item Unique Identification Implementation Plan	L	L	L	M	L	10
Clinger-Cohen Act Compliance	L	L	L	M	L	10
Replaced System Sustainment Plan	M	L	L	M	L	10
Summary of value assessments for information requirements	Program Offices	Program Executive Offices	Service Acquisition Executives	OSD Organizations	Combined Average	Time to complete (months)
Number of high value	21	20	22	36	24	13
Number of moderate value	22	23	13	13	20	12
Number of less than moderate value	6	6	14	0	5	12

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