



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
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MARINE CORPS BULLETIN 4400

From: Commandant of the Marine Corps
To: Distribution List

Subj: ALIGNMENT OF PRODUCT SERVICE CODES (PSC) WITH OBJECT CLASS CODES (OCC)
TO COMPLY WITH THE DIGITAL ACCOUNTABILITY AND TRANSPARENCY ACT (DATA)

Ref: (a) Public Law 113-101, "Digital Accountability and Transparency Act of 2014," May 9, 2014
(b) OMB CIRCULAR A-11, "Preparation, Submissions, and Execution of the Budget," July, 2016
(c) DoD Instruction 5000.74, "Defense Acquisition of Services," January, 5, 2016
(d) Joint ASN (RD&A) and (FMO), "Guidance for Aligning PSC and OCC in Procurement and Financial Systems for Contractual Services
(e) OUSD, Requirement to Record the OMB OCC AND PSC on all Purchase Requests and Commitments
(f) MARADMIN 298/16
(g) 5 U.S.C. 552a
(h) SECNAVINST 5211.5E
(i) SECNAV M-5210.1

1. Situation. The purpose of this Marine Corps Bulletin (MCBul) is to establish policy and procedures that facilitate the Marine Corps' ability to comply with references (a) through (i). Commands are required to use the most current Marine Corps Object Classification/Sub-object Classification Manual located at:
<https://ehqmc.usmc.mil/org/pr/fiscalops/accounting/fiscalcodes/Financial%20Code%20Configuration%20Control%20Board%20FCCB/FY18/OCSOC%20Manual%20FY18%20Final%20V2%20dtd%2030%20Sept%202017.pdf>.

2. Background

a. References (a) and (b) require Object Class Codes (OCC) to be assigned as the standard to provide visibility of funds execution starting in fiscal year 2016. All funds execution data will be organized by OCC and available to stakeholders. Having the ability to trace procurement expenditures and obligations for supplies and services back to the budget streams which funded them allows government leadership and the American taxpayer to understand which procurement instruments are being used to execute specific funds. Additionally, Product Service Codes (PSC) and OCCs are used to analyze, forecast and manage an entity's spending. Capturing accurate, consistent and repeatable PSC-OCC combinations will enable linkage of procurement and financial data, eliminate erroneous data, and result in more accurate accounting of procurement line item expenditures.

b. To support this requirement, the Office of the Under Secretary of Defense and the Department of the Navy (DON) published references (d) and (e) respectively requiring the inclusion of the PSC with the associated OCC in all new purchase requests (PR).

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(1) PSCs describe products, services, and Research and Development purchased by the federal government to indicate what was bought for each contract action reported in the Federal Procurement Data System. PSCs should be consistently associated with OCCs to facilitate compliance with reference (a) and (c).

(2) Reference (b) defines OCCs as categories in a classification system that reflects obligations by the items or services purchased by the federal government. The object classes present obligations according to their initial purpose, not the end product or service.

3. Mission. Effective on the date of release of this Marine Corps Bulletin, Marine Corps commands and activities will adhere to this guidance to enable the Marine Corps to comply with reference (a).

4. Execution

a. Concept of Operations

(1) Marine Corps acquisition and requisitioning activities will ensure that all service requests (SR) or purchase requests (PR) include an accurate PSC/FSC and OCC that corresponds to the actual product or service being requested in accordance with reference (h).

(a) This directive is applicable to all Marine Corps requirement generators regardless of the method utilized to purchase goods or services. It is the responsibility of the requirements generator to ensure that the PSC/OCC chosen accurately represents what is being purchased for each contract line number (CLIN) and sub-contract line number (SLIN) as applicable.

(b) To select the most accurate PSC, use the Defense Procurement Acquisition Policy (DPAP) PSC Selection Tool available at: <https://www.psctool.us> when generating a request. The tool is searchable by taxonomy or key words and facilitates the best match from over 2400 PSCs. After selecting the proper PSC, identify the corresponding OCC by using the PSC to OCC Crosswalk Tool at <http://www.osd.mil/dpap/pdi/p2p>. After using the PSC to OCC crosswalk tool, the correlating OCC will then be documented in the line of accounting for each CLIN/SLIN.

(c) Only Requisition Authority (normally supply officers) will have the authority to override the following OCC's: 120, 121, 122, 252, 253 and 410). These override procedures/authorities are temporary solutions to allow commands to meet their missions while Headquarters, Marine Corps (HQMC) explores long term permanent solutions. For Non-Contractual Purchases of Goods and Services from Federal Sources under OCC (253) and all related Sub-Object Classification Codes outlined in the "Marine Corps Object Classification/Sub-Object Classification Manual dated 30 Sept 2017, use the PSC of X999.

(d) Comptrollers will review potential discrepancies and route valid disputes to Headquarters Marine Corps (HQMC), Program and Resources (P&R) Fiscal Codes Configuration Control Board (FCCCB), who will serve as the coordinating liaison between Marine Corps activities and DON for discrepancy reconciliation.

(e) Reference (e) defines the process for adjudicating disagreements between contracting officers and requiring activities regarding selection of the PSC. Contracting officers and comptrollers should

coordinate PSC/OCC combinations prior to submission of the SR/PR to the contracting office for execution. If the contracting officer still disagrees with the PSC chosen by the requirement generator, there are two possible outcomes:

1. The first outcome is that the selection of a different PSC does not change the OCC in the line of accounting; in this case, the contracting action continues and the contracting officer enters the correct PSC into the procurement system.

2. The second outcome is that the selection of a PSC does change the OCC in the line of accounting. In this case, the contracting officer and the requiring activity should attempt to reach agreement on the appropriate PSC to use. If the contracting officer's decision requires a different PSC/OCC combination, the requiring activity will reject the SR/PR and the requiring activity will amend the SR/PR to provide the corrected OCC in the line of accounting.

b. Tasks

(1) Deputy Commandant, Installations and Logistics (DC I&L)

(a) Provide oversight and updated policy, as required, as the Marine Corps enterprise Military Standard Requisitioning and Issue Procedures manager, Logistics Automated Information System manager, and co-lead for Financial Improvement and Audit Readiness efforts.

(b) In conjunction with Deputy Commandant, Programs and Resources (DC PR), publish interim guidance for validated PSC/FSC/OCC discrepancies until remediation within the DPAP tool as they occur.

(b) Ensure that systems used to obtain goods and services are updated to comply with this directive.

(c) Assign a member to participate in the DC PR FCCCB.

(2) Deputy Commandant, Programs and Resources (DC P&R)

(a) Ensure compliance by the Marine Corps Total Force to include HQMC centrally managed programs.

(b) Provide DC IL with requested financial information to facilitate the analysis of PSC/FSC/OCC execution.

(c) Validate PSC/FSC/OCC discrepancies within the DPAP tool and coordinate with DON and OSD to ensure corrective action.

(d) Monitor OCC execution against command validated phasing plans with an emphasis on contract service OCCs.

(e) Include PSC/FSC/OCC direction as part of the command's yearly financial guidance.

(f) Validate and publish a list of OCCs that do not have correlating PSC/FSCs. Reference the most current OCC/Sub-Object Class manual.

(g) Validate and adjust OCC controls provided in FY19 Program Objective Memorandum.

(3) Commander, Marine Corps Systems Command

(a) Ensure acquisition system requirements are developed, if necessary, to comply with this directive.

(b) Update all training materials for acquisition systems to ensure system procedures are being used in compliance with this directive.

(4) Marine Corps Forces and Major Subordinate Commands

(a) Ensure compliance with this directive among subordinate commands.

(b) Ensure all SRs and PRs for contractual goods and services include PSCs and OCCs.

(c) Revise local standard operating procedures to ensure compliance with this guidance.

(5) Commanding General, Training and Education Command

(a) Incorporate OCC and PSC information into curricula at all financial management and supply courses as applicable.

5. Coordinating Instructions

a. Procurement personnel at all levels will ensure that a copy of this policy is posted to appropriate Marine Corps websites/SharePoint sites and included in desktop turnover folders. Procedures will also be included in Major Subordinate Command - level manager's internal control program checklists (e.g., Supply Maintenance Analysis Team, Logistics Readiness Evaluation Team, etc.).

b. Specific assistance with selecting the appropriate information technology PSC can be sent to the Information Technology Procurement Request Review and Approval System coordinator, HQMC Command, Control, Communications, and Computers at itprocurement@usmc.mil.

6. Administration and Logistics

a. Privacy Act. Any misuse or unauthorized disclosure of Personally Identifiable Information (PII) may result in both civil and criminal penalties. The DON recognizes that the privacy of an individual is a personal and fundamental right that shall be respected and protected. The DON's need to collect, use, maintain, or disseminate PII about individuals for purposes of discharging its statutory responsibilities will be balanced against the individuals' right to be protected against unwarranted invasion of privacy. All collection, use, maintenance, or dissemination of PII will be in accordance with the Privacy Act of 1974, as amended (reference (g)) and implemented per reference (h).


b. Records Management. Records created as a result of this Bulletin shall be managed according to National Archives and Records Administration approved dispositions per reference (i) to ensure proper maintenance, use, accessibility and preservation, regardless of format or medium.

c. Cancellation Contingency. This Bulletin is cancelled one year from the date of publication or when incorporated into reference (a), whichever occurs first.

7. Command and Signal

a. Command. This Bulletin is applicable to the Marine Corps Total Force.

b. Signal. This Bulletin is effective the date signed.

A handwritten signature in black ink, appearing to read "M. G. Dana". The signature is fluid and cursive, with a large loop at the end.

M. G. DANA
Deputy Commandant for
Installations and Logistics

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