

DEPARTMENT OF THE NAVY

COMMANDER NAVY INSTALLATIONS COMMAND (20374-5140) NAVAL FACILITIES ENGINEERING SYSTEMS COMMAND (20374-5065) WASHINGTON NAVY YARD DC

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JOINT LETTER

From: Commander, Navy Installations Command

Commander, Naval Facilities Engineering Systems Command

Subj: SHORE INFRASTRUCTURE ACCELERATION AND AFFORDABILITY

CAMPAIGN PLAN GUIDANCE

Ref: (a) FC 2-000-05N

(b) NAVFAC BPMS PDC-02-03.01

(c) CNIC NOTICE 11000 N4 of 28 Mar 2024 (Canc: Mar 2025)

(d) NAVFACINST 11013.41

(e) NAVFAC BPMS PDC-02-03.02

(f) MIL-STD-3007G

(g) NAVFAC VG 24-003

(h) PEO II memo 4330/014 of 6 May 24

(i) OPNAVINST 11010.20J

Encl: (1) Adjudication of Customer Requested Changes

(2) Glossary of Terms

1. Background

- a. Current planning, budgeting, and project execution timelines do not deliver affordable, mission ready shore facilities and infrastructure in time to meet mission critical Fleet requirements. Additionally, current and future budget levels are not sufficient to acquire all the infrastructure required by the Navy for essential missions. We simply cannot afford all the infrastructure necessary to meet warfighting imperatives, nor deliver it in time, using traditional approaches for programming and executing Military Construction (MILCON) and Centrally Managed Program (CMP) projects. We must think, act and operate differently, to include the employment of new and innovative solutions to reduce the cost and increase the speed of infrastructure project delivery.
- b. Commander, Navy Installations Command (CNIC) and Naval Facilities Engineering Systems Command (NAVFAC) leaders and staff are aggressively engaged in identifying opportunities to reduce project delivery timelines and shore infrastructure cost. While these efforts continue, implementing guidance is needed to capitalize on available opportunities and synchronize efforts across the enterprise to deliver accelerated and cost-effective solutions.

- c. To ensure the most effective allocation of resources, project sponsors will be required to establish a Minimum Viable Project (MVP) scope and Regional Commanders will serve as the requirements "police." Establishing a MVP scope that supports the intended mission, no more and no less, is critical to reducing the Navy's overall program costs and enables the Navy to buy down additional facility risk through thoughtful allocation of resources. Further, Project Sponsor, Supported Commander, and key project stakeholder engagement throughout a construction project's lifecycle is essential. Each MILCON project will conduct a planning charrette during the planning phase of project development to determine validated facility requirements. Alternative Construction Methods (ACM) and scope decisions shall be made to ensure the development of accurate programming cost estimates and to prevent project schedule and cost growth during project development and execution. Moreover, customer requested changes (CREQ) to project requirements and scope during design or construction, which often result in major project schedule and cost increases, will not be approved after the planning phase unless endorsed by Type Commander (TYCOM) Principal and approved by the CNIC Commander. Implementing a formal change management process that ensures any CREQ are adjudicated at the appropriate level of leadership is imperative to control cost and schedule growth.
- 2. <u>Purpose</u>. In support of Navy MILCON and selected CMP projects, this joint letter establishes CNIC and NAVFAC policies for immediate implementation to reduce project costs and delivery timelines and mitigate the risk of project cost and schedule growth. This letter includes policy and guidance for establishing MVP baselines as the final agreement on project scope and facility requirements; implements expanded use of ACM; establishes use of planning charrettes; reinvigorates use of highly performance oriented scopes of work for design-build (DB) projects using Lean Design-Build (LDB) as the moniker; and identifies thresholds and approval authorities for the adjudication of CREQ that impact project cost and delivery schedules.
- 3. <u>Scope and Applicability</u>. This interim policy applies to MILCON and selected CMP projects and to all CNIC and NAVFAC Headquarters, Regions, Facilities Engineering Commands (FEC), Installations, and all tenant activities located on CNIC installations, including joint bases for which Navy is the lead service.
- 4. <u>Policy and Procedures</u>. The following items provide specific guidance for immediate implementation by CNIC and NAVFAC.

a. MVP Scope Identification

(1) The project scope shall include only the minimum space, capability, and capacity required to deliver the essential mission, without negatively impacting fire, life safety, health and applicable Department of Defense (DoD) building code requirements. The MVP shall be identified through disciplined requirements development culminating in a planning charrette per reference (a). The MVP project scope, decisions regarding applicability of ACM, mission need date (MND), and any key performance parameters for the project shall be documented in the final planning charrette summary report and codified by CNIC endorsement at the Region Commander level and approval by the CNIC Commander. All Navy MILCON and selected CMP projects will utilize a planning charrette for this purpose.

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- (2) Although this joint letter anticipates that planning charrettes will generally occur during the planning phase of project development, CNIC can authorize and fund an earlier planning charrette to provide multi-discipline technical and cost support to assist the project determination phase (otherwise known as analysis of alternatives/economic analysis) effort before project development starts.
- (3) Starting at project initiation as defined by reference (b) and (c), and throughout the life of the project, apply governance per reference (d) to include project change management to monitor and control changes during planning, design and construction. Zero project changes after planning is the standard. Changes in execution significantly drive-up costs and schedule impact. Any proposed changes must be requested by the Project Sponsor Flag Officer and approved by the CNIC Commander. Appropriate facility requirements decision makers, such as Regional Commanders, Installation Commanding Officers, and mission owners, shall commit to identifying, approving, and supporting project MVP scopes to enable greater affordability of Navy mission requirements in this highly constrained budget environment.
- (4) For CMP projects not selected to undertake a planning charrette, MVP scope, and project charter effort; the mission owner and key project stakeholders shall implement MVP scope principles to ensure the cost of the project is limited to the minimum scope needed to perform the mission. This will further support program affordability.
 - b. Project Baseline Approval and Governance (Scope, MND, Cost).
- (1) When project planning is substantially complete, endorsed by the TYCOM Flag Officer and approved by CNIC, NAVFAC will issue a Project Charter per reference (d) to document the agreed-upon project baselines and governance for project success to meet mission objectives. The Project Charter with supporting enclosures shall establish the project scope baseline and the MND as the schedule baseline. Supporting enclosures will include:
 - (a) Initial DD1391 with updated cost based on MVP requirements and final scope;
 - (b) ACM analysis; and
 - (c) Planning Charrette Summary Report.
- (2) For CNIC CMP projects, the DD1391 cost will establish the cost baseline as part of the Project Charter. For Navy MILCON projects, the cost baseline will be established at Certified Final DD1391. However, the cost in the initial DD1391 can be used by CNIC and Office of the Chief of Naval Operations (OPNAV) to track any potential cost variation from the Requirements Data Sheet (RDS) to validate or reprioritize programming decisions. NAVFAC will provide continuous cost and project status updates to CNIC and OPNAV until project development is complete and budget ready.
- (3) In addition to establishing initial project baselines, the Project Charter and supporting documents establish project success and performance criteria, overall project risk, key roles and

responsibilities, and project closeout requirements. The Project Charter will be routed to the Region Commander for endorsement and the CNIC Commander for final approval.

- (4) Upon endorsement of the Project Charter and established project baselines, any scope changes shall be processed per reference (e) and adjudicated as established in enclosure (1).
- (5) Exemptions to criteria related to project scope and mission requirements that do not impact mandatory provisions of the DoD Building Code including fire, life safety, and health related criteria, may be requested through NAVFAC as procedures prescribed in reference (f). Such mission requirement related criteria exemptions will be supported, and formally endorsed by CNIC, when allowable to provide for construction of code compliant facilities that meet the established MVP at the lowest feasible cost. Unified Facilities Criteria revisions may be considered where criteria changes are consistently needed for all facilities of a particular type or mission requirement.

c. ACM Implementation.

- (1) Use of ACM is a mandatory cost saving measure that will be employed unless there is a validated justification of the inability to use ACM. This will be endorsed by the Region Commander and approved by the CNIC Commander. Reference (g) provides a framework to enable collaboration with the project requirements owner for analyzing potential cost savings using ACM. Cost and time saving decisions impacting mission and lifecycle costs should be made early in project development stages and documented in the planning charrette and Project Charter. Requirements determinations and cost and mission trade-off decisions will be made by CNIC in collaboration with the appropriate resource and mission sponsors.
- (2) During planning, the NAVFAC Project Development Team (PDT) shall review and validate facility requirements and project scope to assess whether they can be satisfied with ACM options. ACM options may include, but are not limited to, modular components, offsite prefabricated industrial construction, tension fabric structures, and pre-engineered metal or fiber reinforced panel buildings. The NAVFAC PDT shall also identify any reduced or exempted criteria opportunities.
- (3) Consideration should be given to exempting criteria that the project sponsor supports and may yield significant savings (i.e., greater than \$1M or 5 percent of the project cost). Criteria applying to fire, life safety, health, and mandatory requirements of the DoD Building Code, laws, or regulations will not be considered. Examples of criteria exemption opportunities are criteria elements related to functional space requirements (square footage), facility operations, material durability, maintenance, or acceptable mission risk (if any). Any criteria to be considered for exemption must be identified by project sponsors and provided for consideration to the supported command, endorsement by CNIC, and approval by NAVFAC Chief Engineer in accordance with procedures defined in reference (f) prior to being included in project development.

d. LDB Project Implementation

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- (1) For appropriate projects, typically those that are less complex, NAVFAC project teams will maximize the use of well-written performance-based DB statements of work that establish the project goal, desired outcomes, and performance metrics. LDB Requests for Proposals will minimize prescriptive requirements to the maximum extent, by minimizing design and associated bridging documents to maximize the Contractor's flexibility and to encourage innovation. Project teams are encouraged to use fast tracking to execute early critical path construction elements (e.g. site work) concurrently with the completion of the final design. Additionally, consideration should be given to providing offerors with the project budget (i.e., DB-to-budget) to encourage innovation in support of project affordability.
- (2) Using existing industry outreach channels, i.e. conference engagements, industry days, and NAVFAC's public facing website, NAVFAC will communicate a renewed commitment to expanding use of performance-based DB statements of work and emphasize to industry partners that the government values the best technical approach that incorporates innovation, including the use of ACM, to achieve reduced cost and schedule.
- e. Adjudication of CREQ that occur after the establishment of the project baselines (cost, schedule and scope) and approval of the Project Charter (i.e., during Design or Construction) shall be per enclosure (1). This guidance supersedes applicable policy for adjudication of CREQ's for Navy MILCON and CNIC CMP projects as outlined in NAVFAC memo Ser CI/007 of 12 Mar 15, "Customer-Requested Modifications to Construction Contracts." However, CREQ associated with projects funded by Program Executive Office Industrial Infrastructure shall be adjudicated per reference (h).

5. Responsibilities

- a. As the Shore TYCOM and per reference (i), CNIC will:
- (1) Require MVP scope for MILCON and selected CMP projects regardless of fund source or resource sponsor. In order to be successful, engage and influence Commander, U.S. Fleet Forces Command, Commander, Pacific Fleet, the warfare enterprises and providers, and other users of Navy installations to pursue only the MVP scope for their construction projects.
- (2) Work closely with project sponsors to validate their shore requirements, integrate those requirements across the Navy, and arbitrate differences, as necessary.
- (3) Be responsible (in coordination with stakeholders) for the adherence to project requirements prepared for real property.
- (4) Direct that the approval of project scope be per paragraph 4b(1) and that the adjudication of customer requested project changes that impact scope, cost or delivery schedule be governed by enclosure (1).
- (5) Prioritize facility management controls provided to Commander, NAVFAC and subordinate Facility Engineering Commands to begin the planning phase as early as possible for

the analysis and validation of the acquisition solution to satisfy the requirement and for Project Development, to include an integrated technical team to conduct ACM and Planning Charrettes.

- (a) Navy MILCON and selected CMP projects will utilize the planning charrette to determine and document the MVP. Planning charrettes play an integral role in facilitating rapid decision-making and problem solving, compress months of planning and scope development into a few focused days of collaboration, and create stakeholder buy-in around a clear, documented description of the project scope. These charrettes are scalable and will be tailored to the project size and complexity. For example, they may require less than a day for routine projects and be greatly streamlined for projects with standardized requirements or designs. CNIC will provide annual Operations and Maintenance funding to NAVFAC for the planned number of projects requiring planning charrettes and project development services.
- (b) CNIC shall establish a Facilities Management Program sub-Special Interest Code (SIC) or a separate SIC to centrally fund the planning phase. Resources shall be programmed based on input from NAVFAC using a resourcing algorithm that is based on the Infrastructure Investment Plan (IIP).
- (6) Direct Project Sponsors, Supported Commanders, and key project stakeholders to ensure engagement throughout a construction project's lifecycle, especially during planning, to drive identification of the MVP scope and quickly adjudicate and mitigate project changes that impact project cost or schedule.
- (7) CMP Project Selection: Each year, upon Shore Cross Functional Team (CFT) approval of the annual IIP, review the IIP and select appropriate CMP projects that require a planning charrette, MVP scope, and project charter.
- (8) Support the preparation of a follow-on CNIC-NAVFAC Program Management Plan to further develop and codify joint CNIC-NAVFAC facility program processes.
- b. As the systems command responsible for facilities technical authority, engineering, and acquisition, NAVFAC will:
- (1) Expand the use of ACM and LDB acquisition to pursue reduced project costs and delivery schedules.
- (2) Communicate to industry partners, including via industry and professional association engagements; the Navy's intent to expand use of ACM and LDB to pursue reduced project costs and delivery schedules. Convey that industry partner innovation is highly desired to meet Navy shore acceleration and affordability goals.
- (3) For LDB acquisition strategy, resource LDB post-award project teams to handle the higher workload that results from LDB construction. Projects team members (including Planning, Design, Construction and Contracting) executing pre and post-award LDB pilot project

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efforts should include experienced, high performing staff and they shall identify, document and share lessons learned on a NAVFAC Flank Speed network page throughout the progression of the project.

- (4) If reimbursable customers desire to fund project development greater than the MVP level at a time earlier than it would otherwise be developed, NAVFAC may support this effort in line with existing work induction processes per reference (c). In these cases, reimbursable customers must also fund NAVFAC for management and oversight to ensure that funding provided by CNIC are not re-directed for NAVFAC effort that does not align with Fleet priorities.
- (5) Closely control management and oversight resources to ensure labor resources are allocated in alignment with Fleet priorities as directed by CNIC. Report on actual costs of pilot planning charrettes and ACM analysis to enable more accurate future year resourcing.
- (6) Lead the preparation of a CNIC-NAVFAC Program Management Plan in collaboration with CNIC to further develop and codify joint CNIC-NAVFAC facility program processes.

6. Points of Contact

- a. The NAVFAC Headquarters (HQ) point of contact for this effort is Mr. Keith Hamilton, PE, SES, Chief Engineer and Assistant Commander for Planning, Design and Construction, shawn.k.hamilton2.civ@us.navy.mil
- b. The CNIC HQ points of contact for this effort is CAPT Chris Casne, N4, Director, Facilities and Environmental Programs, christopher.s.casne.mil@us.navy.mil

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Adjudication of Customer Requested Changes

- 1. <u>Background</u>. To reduce project costs and stretch the affordability of the Navy's limited budget, supported commanders and project teams shall (a) identify and approve only the Minimum Viable Project scope and requirements and (b) avoid or minimize subsequent changes to the scope and requirements, as well as any changes that increase the project cost or the delivery schedule.
- 2. <u>Policy for Adjudication of Customer Requested Changes</u>. The thresholds and approval authorities below provide a minimum starting point for project change management and governance, during design and construction, and after the scope approval during planning. Projects having higher criticality or cost may need to scale the thresholds and approval authorities to align with the needs of the project. However, CREQ associated with projects funded by Program Executive Office Industrial Infrastructure shall be adjudicated per reference (h).

Pre-award ¹ - Customer Requested Change Approval Authorities				
Approver	REGCOM/REG ENG	CNIC Commander	CNIC Commander	
Cost ²	Individual or cumulative changes that do not result in a project cost exceeding the project's Estimated Construction Cost (ECC) as the budget for construction.	Individual or cumulative changes that result in a project cost exceeding the ECC but do not exceed the DD1391 Programmed Amount (MILCON) or DD1391 budget amount (CMP).	Individual or cumulative changes that result in a project cost exceeding the DD1391 Programmed Amount (MILCON) or DD1391 budget amount (CMP).	
Schedule ³	Individual or cumulative schedule changes which do not delay project delivery beyond the project's Planned Beneficial Occupancy Date (PBOD).	Individual or cumulative changes which delay project delivery beyond the PBOD but do not delay project delivery beyond the Required BOD (RBOD).	Individual or cumulative changes that delay project delivery beyond the RBOD.	
Scope	Changes necessary for delivery, but that do not impact the capability or capacity which will be delivered.	Changes not conflicting with the scope defined in the enacted congressional DD1391 (MILCON) or DD1391 at award (CMP).	Changes that conflict with the scope defined in the enacted congressional DD1391 (MILCON) or DD1391 at award (CMP).	

^{1.} Pre-award refers to any stage of project development prior to primary construction contract award, i.e., during planning or design phases.

^{2.} The cost baseline is the funding requirement amount at construction contract award, necessary to complete the project; including Supervision, Inspection, and Overhead (SIOH), Post Construction Award Services (PCAS), Post Award Design Services (PADS), etc.

^{3.} The schedule baseline includes the PBOD, MND, and the RBOD necessary to meet the MND. For projects programmed Late to Need and that cannot meet the MND, the schedule baseline for all customer requested changes is the agreed upon PBOD established in the Project Charter.

Construction ¹ - Customer Requested Change Approval Authorities				
Approver	REGCOM/REG ENG	CNIC Commander	CNIC Commander	
Cost ²	MILCON: Individual changes up to the lesser of \$1M or cumulative changes up to 20 percent of the project contingency at award.	MILCON: Individual changes up to the lesser of \$20M or cumulative changes up to 40 percent of the project contingency at award.	MILCON: Changes that exceed the Above Threshold Reprogramming threshold and changes exceeding 40 percent of the project contingency at award.	
	CMP: Individual changes up to the lesser of \$1M or cumulative changes up to 3 percent of the construction award amount	CMP: Individual changes up to the lesser of \$5M or cumulative changes up to 5 percent of the construction award amount.	CMP: Individual changes up to the lesser of \$5M or cumulative changes up to 5 percent of the construction award amount	
Schedule ³	Individual or cumulative schedule changes which do not delay project delivery beyond the project's PBOD.	Individual or cumulative changes which delay project delivery beyond the PBOD but do not delay project delivery beyond the RBOD.	Individual or cumulative changes that delay project delivery beyond the RBOD.	
Scope	Changes necessary for delivery, but that do not impact the capability or capacity which will be delivered.	Changes not conflicting with the scope defined in the enacted congressional DD1391 (MILCON) or DD1391 at award (CMP).	Changes that conflict with the scope defined in the enacted congressional DD1391 (MILCON) or DD1391 at award (CMP).	

- 1. Construction refers to any stage of project after the construction contract award.
- 2. The cost baseline is the funding requirement amount at construction contract award, necessary to complete the project; including SIOH, PCAS, PADS, etc.
- 3. The schedule baseline includes the PBOD, MND, and the RBOD necessary to meet the MND. For projects programmed Late to Need and that cannot meet the MND, the schedule baseline for all customer requested changes are the agreed upon PBOD established in the Project Charter.

GLOSSARY OF TERMS

- 1. <u>Alternative Construction Methods (ACM)</u> Methods of construction that differ from traditional forms of construction. ACM may include but are not limited to off-site/industrial construction, volumetric or kit-of-parts modular construction, offsite prefabricated construction, tension fabric structures, and pre-engineered metal or fiber reinforced panel buildings.
- 2. <u>Beneficial Occupancy Date (BOD)</u> The date when the project is accepted and ready to be turned over to the customer for use. Prior to BOD, this date should be estimated based on the best information available. For Financial Improvement and Audit Readiness, BOD is the Placed-In-Service date.
- 3. <u>Fast Track Construction</u> A construction method where the design and construction phases of a project are carried out simultaneously in order to speed up the overall project timeline. Construction begins before the entire design is complete and the design is finalized as construction progresses. This method is often used to reduce the overall project duration and save time but requires close coordination between the design and construction teams.
- 4. <u>Lean Design-Build (LDB)</u> LDB is an informal term that is being used, instead of design-build, to emphasize the goal to maximize the use of performance (vice prescriptive) oriented requirements to enable greater opportunity for innovation by industry partners to deliver projects more quickly and at lower cost. NAVFAC project teams have often strayed towards the use of more prescriptive requirements resulting in less opportunity for industry partners to apply expertise and innovation. LDB (design-build done right) is a project delivery method in which a single Design-Builder entity is responsible for both the design and construction phases of a project, emphasizing the use of well written performance requirements that define the project's goals, desired outcomes, and performance metrics, while minimizing prescriptive requirements to encourage innovation and efficiency.
- 5. <u>Minimum Viable Project (MVP) Scope</u> Project includes only the minimum space, capability, and capacity required to deliver the essential mission, fire, life safety, health and applicable Department of Defense (DoD) building code requirements.
- 6. <u>Mission Need Date (MND)</u> The date by which the Supported Commander requires facility infrastructure and all facility outfitting in place to support a specific capability or requirement. The MND must have some documented basis, e.g., arrival of ships, aircraft, personnel, equipment; established Ready for Training (RFT) date; or required life/safety or functional modifications. The Supported Commander defines the MND. Only the Supported Commander can authorize changing the MND. There may be instances where the project does not have a MND or the supported commander has more flexibility to adjust the MND, because the mission can be temporarily supported by other means.
- 7. NAVFAC Project Development Team (PDT) A team that includes all NAVFAC Directorate and Product Support Line staff that play a role in leading or supporting the development of a MILCON or Facilities Sustainment Restoration Modernization Centrally Managed Program (CMP) DD1391. This includes Planning, Design, and Construction staff, such as a Project

Manager, Project Planner, and the Project Technical Team comprised of Designers, Cost Estimators, and Engineers; but may also include participation from other Directorates, such as Public Works for Asset Evaluation, Facilities Planning Document inputs, and Environmental Product Support Line inputs on environmental checklists and National Environmental Policy Act documentation.

- 8. <u>Offsite Pre-fabricated Construction</u> A construction method where building components are manufactured in a factory or fabrication yard setting and then transported to the construction site for assembly. Offsite prefabricated construction can include the use of modular construction, where entire rooms or structures are prefabricated (volumetric), as well as panelized construction, where walls, floors, components and roofs are prefabricated (kit-of-parts).
- 9. <u>Planned Beneficial Occupancy Date (PBOD)</u> The estimated date when the project will be accepted and ready to be turned over to the customer for use. This is the date NAVFAC is committing to the Supported Command to have all NAVFAC contractual obligations (e.g., facility construction and any equipment outfitting) completed. This date should be coordinated with the Supported Command to ensure any follow-on work and outfitting can be programmed and completed by the Supported Command.
- 10. <u>Project Charter</u> A project management document prepared by the DoD Construction Agent during project initiation that formalizes key project agreements regarding project scope, schedule, budget, risk, roles and responsibilities, and project success criteria (reference b).
- 11. <u>Project Complexity Determination Matrix</u> A tool to establish the initial project complexity during project initiation, which establishes the level of project governance required to meet project objectives (reference d).
- 12. <u>Project Initiation</u> Process that launches the project execution of a new project. Project initiation occurs when funded by a Resource Sponsor or Activity and when requirements for more than one Product and Service from multiple NAVFAC communities (e.g., planning, environmental, design, construction, Command Information Office) are identified to be required to achieve delivery of Category 1 or 2 facility construction. Project management services commence with the establishment of project initiation.
- 13. Required Beneficial Occupancy Date (RBOD) For projects that have an achievable MND, the RBOD is latest date that BOD can occur and still support meeting the Mission Need Date. The RBOD is calculated as the Mission Need Date minus the time required by the Supported Commander for any additional equipment fit-out and other customer preparations. If there is no post-BOD equipment fit out or other preparations, then RBOD = MND. For projects that do not have an achievable MND (resulting from being programmed late top need, etc.), the RBOD shall be the date that NAVFAC commits to achieving BOD after discussion and agreement with the supported commander.
- 14. <u>Requirements Data Sheet (RDS)</u> Key supporting document that explains and justifies a requirement for a mission need to be used by CNIC and OPNAV to validate and prioritize requirements for programming decisions. The Installation Work Induction Board

inducts/authorizes an RDS when the requirement may be a project that is determined to be either a MILCON or Centrally Managed Program (CMP) Project.

15. <u>Tension Fabric Structures (TFS)</u> - Lightweight, flexible structures that are held in place by tension cables or rods. The fabric is stretched over the frame to create a taut and stable surface, which can be used for a variety of purposes. These structures are often used for their ability to create large, open spaces with minimal support structures, and for their ease of assembly and disassembly. They are susceptible to failure in wind-borne debris regions.