

SC-COS

21 August 2019

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Policy Memorandum 6-19, Synchronized Pre-deployment and Operational Tracker (SPOT) in the United States Southern Command (USSOUTHCOM) Area of Responsibility (AOR)

1. Purpose: This policy provides guidance to fully implement the Synchronized Pre-deployment and Operational Tracker (SPOT) in the HQ USSOUTHCOM (CONUS) and the USSOUTHCOM AOR to account for and manage DoD contractors.

2. References: See Enclosure 1.

REPLY TO ATTENTION OF

3. Applicability: This policy supersedes Policy Memorandum 01-12, dated 15 Feb 2012 and applies to all HQ USSOUTHCOM directorates/staff, Component Commands, Joint Task Forces, DoD contractors, and other DOD organizations operating in the USSOUTHCOM AOR or working in the USSOUTHCOM Headquarters (SCHQ); during contingency operations (as defined in reference (1)), humanitarian and/or peacekeeping operations and all Phase 0, steady state military operations or exercises executed as part of the Phase 0 shaping activities in the AOR.

a. The term contractor in this policy applies to all tiers of Contractors Authorized to Accompany the US Armed Forces (CAAF) as defined in reference (3), and also includes the following personnel working on DOD-funded contracts:

b. All US citizens and third country national (TCN) employees who deploy into the USSOUTHCOM Area of Responsibility for periods of performance anticipated to exceed 30 consecutive days of the period of the contract performance.

c. Third Country Nationals (TCN), Host Nation (HN) or Local Nationals (LN) who reside with or work in the immediate vicinity of US forces and/or civilian DOD personnel for periods of performance anticipated to exceed 30 consecutive days of the period of the contract performance.

d. Private Security Contractors and contingency contractor personnel authorized to carry weapons regardless of proximity to US forces or the length of the period of performance of their contract.

e. Contractors whose contracts' primary place of performance is SCHQ or who temporarily perform duties in SCHQ for periods exceeding 30 days of the contract performance period.

4. Policy: Effective immediately, in accordance with reference (2), the SPOT database will serve as the central repository for information on contractors and contract capabilities in the USSOUTHCOM AOR and in the SCHQ during all operational phases (to include Phase 0), in accordance with the Enclosure. The SPOT database will also serve as the central repository for information on contractors and contract capabilities in the SCHQ. No contractor personnel will be authorized entry into the USSOUTHCOM Theater until they are registered in SPOT and possess a SPOT-generated Letter of Authorization (LOA). Contractor personnel whose primary place of performance is SCHQ will not be authorized entry into SCHQ until they are registered in SPOT and possess a SPOT-generated Letter of Authorization (LOA).

SC-COS SUBJECT: Policy Memorandum 6-19, SPOT in the USSOUTHCOM AOR

During Phase 0, the Joint Asset Movement Management System (JAMMS) will be an adjunct to SPOT to support contractor tracking and management in key forward locations within the USSOUTHCOM AOR. The JAMMS will be positioned and used at SOUTHCOM enduring locations to capture personnel movements through these key nodes. The JAMMS will also be used to facilitate contractor management in SCHQ. SOUTHCOM enduring locations include:

- a. Main Operating Base Naval Station Guantanamo Bay, Cuba
- b. Forward Operating Site Soto Cano Air Base (SCAB), Honduras
- c. Cooperative Security Location (CSL) Comalapa, El Salvador
- d. Cooperative Security Location (CSL) Reina Beatrix International Airport, Aruba
- e. Cooperative Security Location (CSL) Hato International Airport, Curaçao
- f. Cooperative Security Location (CSL) Luis Gomez Nino Air Base, Apiay Colombia
- 5. Responsibilities: See Enclosure 2.

6. Records Management: Records generated by the implementation of this regulation will be maintained in accordance with CJCSM 5760.01, Joint Staff Records Schedule.

7. Point of contact for this Policy is the SCJ4 at <u>southcom.miami.scj4.mbx.omb-j46-jloc@mail.mil</u> or 305-437-0655.

The proponent agency of this policy is the US Southern Command. Users are invited to send comments and suggested improvements to: HQ USSOUTHCOM ATTN: J4, 9301 NW 33rd St., Doral, FL, 33172-1202.

FOR THE COMMANDER:

PATRICIA M. ANSLOW Major General, U.S. Army Chief of Staff

2 Encls1. References2. Responsibilities

DISTRIBUTION: D

Enclosure 1 REFERENCES

1) Title 10 US Code, 101 (a), (13).

2) OSD Memorandum of 25 January 2007, "Designation of Synchronized Pre-deployment and Operational Tracker (SPOT) as Central Repository for Information on Contractors Deploying with the Force (CDF)."

3) DoDI 3020.41 of 20 December 2011, Operational Contract Support (OCS).

4) Defense Federal Acquisition Regulation Supplement (DFARS) 252.225-7987, October 2014, Requirements for Contractor Personnel Performing in the U.S. Southern Command Area of Responsibility.

5) DoD Business Rules for the Synchronized Pre-deployment and Operational Tracker (SPOT), 10 May, 2018.

6) CJCSM 3150.13C, Joint Reporting Structure - Personnel Manual, 10 March 2010.

7) DMDC SPOT Website, <u>https://spot.dmdc.mil</u>.

Enclosure 2 RESPONSIBILITIES

1) All HQ USSOUTHCOM directorates/staff, Component Commands, Joint Task Forces, SCO's and HQ Commandant will support contractor accountability and management during all operational phases by ensuring all supporting contracts with place of performance in theater or at SCHQ or subordinate HQs include appropriate provisions for SPOT use to include:

a. Ensuring that appropriate personnel are trained and registered to use SPOT/TOPPS (information on SPOT resources, training and registration is at reference (7)).

b. SCJ4 will monitor actions required to support this policy via the tasker system and new requirements will be implemented completed NLT 30 September 2019. This includes the utilization of JAMMS; training and registration of personnel needed to use and oversee SPOT; inclusion of appropriate SPOT-related provisions in applicable contracts; and registration of and issuance of LOAs to qualifying contractors in the AOR and/or SCHQ.

c. Existing contracts will be modified to include reference (4) within 120 days if the current contract does not include the clause.

2) Service Component and Joint Task Force Commanders:

a) During all phases, oversee and utilize the JAMMS stations at applicable CSLs and Forward Operating Sites. CSLs and FOSs will identify where the JAMMS systems will be positioned to capture maximum number of contractor personnel on a regular basis. Further, CSLs and FOSs will operate the systems IAW the JAMMS user manual available at reference (7).

b) During contingencies, account for all contractors *in situ* within designated operational areas and provide requisite support (force protection, medical support, personnel recovery, and other related support) in accordance with references (6 and 3, respectively) and as designated in their contracts, LOAs, or in USSOUTHCOM orders (note: while USSOUTHCOM orders do not constitute a binding agreement with a contractor, they may generate contract modifications to support operational requirements, such as more stringent force protection measures).

3) MILGP/MAAG/SCO Commanders:

a) Ensure that only contractors who are registered in SPOT and have a signed LOA in the system are granted Country Clearance (exceptions may be requested through the SCJ4).

4) Director, USSOUTHCOM J1:

a) In coordination with SC staff oversee contractor accountability and conduct contractor strength accounting during Phase 0 and contingency operations in accordance with reference (7).

b) Ensure SOUTHCOM JTF and component personnel utilize SPOT-ES as the system of record for contractor accountability in JPERSTATs, strength accounting and related documents.

5) Director, USSOUTHCOM J2:

a) Ensure Security Management denies permanent party badging for contractors without an accurate SPOT LOA number as part of the contractor's badging request.

b) Coordinate a reciprocal SPOT security management policy requirement with other SC components.

c) Verify SPOT registration (e.g., SPOT LOA) of contractor personnel requesting DOD CAC cards in the Trusted Agent System.

6) Director, USSOUTHCOM J3:

a) Will deny Theater Clearance to contractors that do not provide an accurate SPOT LOA number in their request.

b) Verify SPOT registration via random spot checks. (Exceptions may be requested through the SCJ4).

c) Provide guidance to subordinate organizations to ensure that Private Security Contractors and contingency contractor personnel authorized to carry weapons during contingency operations or other military operations (regardless of proximity to US forces or the length of the period of performance) are registered in SPOT.

d) Ensure AOR wide installation entry control procedures incorporate the verification of SPOT registration (e.g. checking SPOT LOA) of DoD Contractor personnel.

7) Director, USSOUTHCOM J4:

a) Serve as the USSOUTHCOM staff proponent for SPOT Enterprise Suite (i.e., JAMMS, TOPPS).

b) Revise this policy and/or issue further implementing instructions to contracting organizations that have contracts with place of performance in the USSOUTHCOM AOR, SCHQ, or subordinate HQ as required.

c) Grant exceptions to this policy when appropriate.

8) Director, USSOUTHCOM J8:

a) Coordinate with SC staff and contracting organizations to ensure the requirements of this policy and/or implementing instructions are included in all SOUTHCOM funded contracts with a place of performance in the USSOUTHCOM AOR, SCHQ, or subordinate organizations.

b) Ensure Trusted Agents (TAs) using the Trusted Associate System (TAS) know to verify SPOT registration (e.g., SPOT LOA) of contractor personnel before allowing a contractor to obtain a CAC.