DEPARTMENT OF THE ARMY
ASSISTANT CHIEF OF STAFF FOR INSTALLATION MANAGEMENT
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

DAIM-ZA FEB 22 2011

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Relocatable Buildings Delegation of Authority

1. References:

a. Memorandum HQDA, DAIM-ZA, 19 Feb 08, subject: Interim Policy Change on Relocatable Buildings for Paragraph 6-13 through 6-17 in AR 420-1, Army Facilities Management.

b. Memorandum HQDA, DASA(IH&P), 11 Jan 11, subject: Delegation of Authority - Relocatable Buildings.

c. Army Regulation (AR) 420-1, Army Facilities Management, effective 19 Feb 08.

2. This memorandum supersedes reference 1.a. and provides policy changes for reference 1.b. on delegation of approval authorities for relocatable buildings accounted for as personal property, obtained by either lease or purchase regardless of the funding source.

3. Subject to compliance with all applicable laws and regulations, I hereby delegate the relocatable building approval authorities contained in this memorandum and depicted in the table at Enclosure 1.

a. Effective immediately, approval authority is delegated to Commanding Generals of organizations having installation or garrison responsibilities: Commander, Army Materiel Command (AMC); Commander, US Army Corps of Engineers (USACE); Commander, Army Medical Command (MEDCOM); Commander, Army Space and Missile Defense Command (SMDC); Deputy Commander, Installation Management Command (IMCOM) and OCONUS General Officers with installation management responsibilities and Commanders with Contingency Area responsibilities will review and approve requests for relocatable buildings at installations under your command or control. This does not include the SES equivalent.

b. You may re-delegate, in writing, all or part of these approval authorities with re-delegation authority, except:

(1) This authority may be re-delegated no lower than a General Officer of organizations having installation or garrison responsibilities.

(2) For Contingency Areas, this authority may be delegated no lower than a General Officer of the next lower headquarters with responsibilities in a Contingency Area. Approved relocatable buildings in contingency areas may be used for the duration of the operation.

(3) Requests from IMCOM garrisons which exceed the delegated authorities contained in this memorandum will be submitted through command channels to DASA(IH&P). All other requests will be submitted through DAIM-ODF to DASA(IH&P).

c. If your command wishes to have an SES equivalent perform the duties outlined in this memorandum, a request for waiver may be submitted through DAIM-ODF to DASA(IH&P). Waivers may be granted for a specific duration to a specifically designated SES.

d. Tenant organizations are prohibited from entering into contracts for the purchase or lease of relocatable buildings.

4. If a structure does not meet the requirements of relocatable buildings contained in 4.a. below, it shall be authorized and funded as construction in accordance with chapter 4, of reference 1.c and accounted for as real property.

a. A relocatable building is defined as:

(1) An arrangement of components and systems designed to be transported over public roads with a minimum of assembly upon arrival and a minimum of disassembly for relocation. A relocatable building is designed to be moved and reassembled without major damage to floor, roof, walls, or other significant structural modification.

(2) The costs for disassembly, repackaging, any exterior refinishing (e.g. brick façade, etc.) and interior modifications (e.g. electrical systems, fire suppression systems, walls or ceilings, etc.) including labor applied to the building after site delivery to make the relocatable building useable, and non-recoverable building components, including foundations, may not exceed 20 percent of the purchase price of the relocatable building. Non-recoverable building components are components that cannot be used again in the reassembly of the subject building.

b. A relocatable building approval may be made for no more than 6 years. A change in the location, building use and organization using the relocatable building requires a

new approval. If the location, building use and organization using the relocatable building does not change and the relocatable building is needed beyond 6 years, IMCOM garrisons may submit requests for extensions through command channels, to DASA(IH&P) with a copy furnished DAIM-ODF. All other requests will be submitted through DAIM-ODF to DASA(IH&P).

5. Relocatable Building authority is delegated as follows, subject to compliance with paragraph 3.

a. Authority to approve the purchase or lease of relocatable buildings to meet short-term requirements, normally 3 years or less but no more than 6 years, for facilities due to transitory peak military missions, deployments, military contingency operations, or disaster relief requirements; or urgent requirements, pending approval, and construction of facilities via normal military construction programs is delegated.

b. The following rules apply to all relocatable buildings obtained under this authority:

(1) Relocatable buildings are accounted for as equipment, personal property.

(2) Purchased relocatable buildings are inventoried, accounted for with Item Unique Identification (IUID) which will be tied to a specific approval document.

(3) Relocatable buildings will be disposed of in accordance with applicable equipment regulations.

(4) The lease for a relocatable building will satisfy a single known requirement.

(5) Use the worksheet at Enclosure 2 when deciding on an appropriate course of action, lease, purchase or construction.

(6) An Option to Purchase clause will not be included in the relocatable building leasing contract. There are only two types of leases that are appropriate for obtaining relocatable space, operating leases and capital leases. Service contracts are not authorized for obtaining space to circumvent these policies.

(7) Purchased relocatable buildings will not be directly converted to real property without approval from Deputy Assistant Secretary of the Army (Installation and Housing) and congressional notification.

(8) Within 30 days of the end of each fiscal year quarter, Commanders will provide to this office a report concerning the use of this delegation of authority on

relocatable buildings. The content and format of the report is shown in Enclosure 3. The report is due only if the delegation authority was used.

6. Requirements for facilities with a known duration of more than three years, and with a construction cost (relocatable building costs plus site preparation costs) that does not exceed the statutory limit for normal operation and maintenance construction (currently $750,000) will be met by construction procedures and not by relocatable buildings. This does not apply to contingency areas and operations where ownership of real property may present a hardship during site turnover.

7. Relocatable buildings systems shall be purchased with either Operation and Maintenance (O&M) or Other Procurement, Army (OPA) funds depending on the Expense/Investment Threshold contained in law for capital equipment purchase. Your supporting Staff Judge Advocates office can determine what the current limit Expense/Investment Threshold is governing your action. The determination of system cost for this purpose will be based on the cost of the completely assembled building and not on the separate components. For example, a relocatable building composed of two trailers (double wide) is a single system and stacked relocatable buildings touching one another are a single system. In both cases, the cost would be combined for the entire system.

8. Commanders are cautioned to use the relocatable authority contained herein only as a last resort. Relocatable buildings will be used at about a 50 percent ratio (square feet) to their real property counterparts except for certain types of uses such as barracks and medical facilities. We must use the relocatable authority wisely, to bridge the gap between mission requirements and the availability of real property facilities.

a. Look at alternate options to provide the needed space. The order of precedence is full utilization of available real property, including full utilization of World War II wooden structures where economic considerations and good engineering judgment dictate, construction of temporary facilities when the total funded cost does not exceed the statutory limit for normal operation and maintenance construction (currently $750,000), and short-term leased space off post.

b. Enclosure 4 contains a list types of equipment and circumstances which are exempt from this delegation and are controlled by the Garrison Commander.

9. Requests that exceed the approval authority delegated in this memorandum will be submitted through command channels to Director, Operations Directorate; DAIM-ODF; Office of the Assistant Chief of Staff for Installation Management; 600 Army Pentagon; Washington, DC 20310-0600.

10. The Point of Contact for this action in OACSIM is Mr. Mike Dean, DAIM-ODF, telephone (703) 601-0703, (DSN 328), e-mail: mike.dean@us.army.mil.

Encl:
As

RICK LYNCH
Lieutenant General, GS
Assistant Chief of Staff
for Installation Management

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INSTALLATION MANAGEMENT COMMAND -PACIFIC REGION, (IMPC)
INSTALLATION MANAGEMENT COMMAND -EUROPE REGION, (IMEU)
INSTALLATION MANAGEMENT COMMAND -KOREA REGION, (IMKO)

Relocatable Building Table of Authorities			
Relocatable Building Action [1]	**Deputy Assistant Secretary of the Army (Installations and Housing)**	**Assistant Chief of Staff For Installation Management[5]**	**DCO IMCOM and COs of AMC, USACE, MEDCOM, SMDC, USAR, USANG, OCONUS GO w Installations, and CO of Contingency Area responsibility [5]**
Lease [4]	6 years, funds unlimited	Not To Exceed (NTE) 6 years, funds unlimited	Not To Exceed (NTE) 6 years, funds unlimited
Existing Lease Extension	6 years, funds unlimited	NTE 6 years, funds unlimited	NTE 6 years, funds unlimited
Transfers to Other Locations	6 years, funds unlimited	NTE 6 years, funds unlimited	NTE 6 years, funds unlimited
Purchase as Personal Property [2]	6 years, funds unlimited	NTE 6 years, funds unlimited	NTE 6 years, funds unlimited
Convert to Real Property [3]	funds unlimited	None	None

1. When the permission to purchase a Relocatable Building is granted, funds available for Operation and Maintenance are used for buildings costing less than $250,000 and buildings costing more than $250,000 must be purchased using Other Procurement, Army (OPA) funds.

2. A Relocatable Building with site preparation and building costing less which total than $750,000 will be locally approved as construction and accounted for as real property, unless it is part of a larger undertaking. This does not apply to Contingency Area Operations.

3. Direct conversion of a Relocatable Building from personal property to real property requires Congressional notification and will not be undertaken without prior approval.

4. Relocatable buildings listed as swing space in approved maintenance and repair or construction projects require no further approval.

5. Re-delegation can be no lower than the Deputy Commanding General of affected units and organizations having installation or garrison responsibilities. For Contingency Areas, this authority may be delegated no lower than the Commanding General, Deputy Commanding General or designated General Officer of the next lower headquarters with responsibilities in a Contingency Area. Approved relocatable buildings in contingency areas may be used for the duration of the operation. Tenant organizations are prohibited from entering into contracts for the purchase or lease of relocatable buildings.

6. IMCOM will submit requests for approvals that exceed 6 years through command channels to DASA(IH&P). All other commands submit requests to DAIM-ODF for approval processing.

Relocatable Building Request Worksheet
Project Title and Installation Name: , Date

This worksheet must be submitted for each approval request.

This request is to (Check and complete one block below):

1. ☐ Lease relocatable building(s). Relocatable buildings are requested for a period not to exceed ___ years, at an estimated total funded cost (total actual lease, delivery, setup, and removal costs) of $___ ($000), at ___ (Garrison name, State), using ___ (e.g., OMA, OPA, OMD, RDT&E, AWCF) funds.

2. ☐ Purchase relocatable building(s). Relocatable buildings are requested for a period not to exceed ___ years, at an estimated total funded cost (total actual purchase, delivery, and setup costs) of $___ ($000), at ___ (Garrison name, State), using ___ (e.g., OMA, OPA, OMD, RDT&E, AWCF) funds.

3. Point of Contact Information. Contact the following POCs regarding this request (Name, Phone Number, Email, and Office):

   a. Garrison. ___
   b. IMA Region reviewing official. ___
   c. HQIMA reviewing official. ___
   d. Agency preparing economic analysis. ___
   e. Installation or Command SJA legal review. ___

4. Justification. Relocatable building support data, attach as Enclosure 1.

   a. Unit(s) and mission the relocatable building supports.
   b. Facility requirements for the units / mission.
   c. Discussion of all options considered to provide facility space.
   d. Justification of urgent, short-term requirement for the relocatable building(s).
   e. Desired date of occupancy and expected duration of the requirement.
   f. Explain the exit plan that will remove the relocatable building(s) from the installation at the end of the requirement. Describe the plan for the removal, disposal, or sale of the buildings and source of funding.
   g. Required removal date.

5. Replacement Project. Will the requirement for the relocatable building(s) be replaced with real property facilities by MILCON or SRM major repair projects?

6. Yes ☐ No ☐ If yes, attach replacement project data as Enclosure 2.

   a. Project Number(s).
   b. Title(s).
   c. Source(s) of funds.
   d. Cost.
   e. Program Fiscal Year.

f. Copy of associated project document(s) (DD Form 1391 or DA Form 4283).

7. Associated Construction. Construction associated with the relocatable building(s) placement.

a. Is all site work necessary to the installation and provision of utilities and other services properly classified by the installation? Yes ☐ No ☐

b. Is the associated construction project approved? Attach copies of DD Form 1391 and DA Form 4283. Yes ☐ No ☐

c. Construction Cost: $___ (Construction includes foundations, utilities, roads, sidewalks, parking, force protection, fencing, signage, lighting, and other site preparation (clearing, grubbing, ditching, drainage, filling, compacting, grading, and landscaping).)

8. Relocatable Building Validation.

a. To be a relocatable building, certain associated costs (columns "a" through "d", Table E-1) must not exceed 20% of the purchase cost of the relocatable building (column "f"). The relocatable building percentage for each facility type in column f must be less than or equal to 20%.

b. The facility must be classified as real property if the percentage is greater than 20% and obtained using minor construction rules contained in AR 415-15.

Table E-1
Relocatable Building Validation
Percentage (g) = (a + b + c + d + e) / (f) * 100

	(a) ($)	(b) ($)	(c) ($)	(d)	(e) [1] ($)	(f) ($)	(g) [2] (%)	(h) [3]
Facility Type (e.g., barracks, admin, classroom, dayroom, arms room, maintenance, laundry, latrine, storage)	Building Disassembly (disconnect and removal from foundation)	Repackaging (including normal repair, refurbishment of components)	Non-recoverable Building Components (fasteners, seals, skirting, anchors, etc.)	Interior and exterior work added to the structure after it is placed on site. (Electrical wiring, walls, fire suppression systems, exterior finishes, flooring, lighting, wall coverings, etc.)	Foundation	Purchase Cost of Relocatable Building (Including delivery and set up)	%	Facility is relocatable (≤20%)

Notes:

1. "Foundation" includes blocking, footings, bearing plates, ring walls, and slabs that are directly under the building. For the purpose of this calculation, "Foundation" does not include construction cost of real property utilities, roads, sidewalks, parking, force protection, fencing, signage, lighting, and other site preparation (clearing, grubbing, ditching, drainage, filling, compacting, grading, and landscaping).

2. All exterior refinishing and interior modifications made after site delivery to make the relocatable building useable for its intended occupant. This includes but is not limited to installation of gypsum board and wood paneling for walls, floor coverings (carpet), sprinkler and alarm system installation, and exterior façade improvements

3. If the percentage in column (g) is more than 20%, the structure must be obtained as real property using construction authorities.

9. Economic Analysis. An economic analysis for each facility type is attached as Enclosure 3 and has been prepared or reviewed by the US Army Corps of Engineers, Installation Support Center of Expertise (ISCX), CEHNC-IS. (For an example of an Economic Analysis and Sensitivity Chart, see Table E-3 and Table E-4.) A separate economic analysis is required for each facility type. Summary of economic analysis:

a. Total Net Present Value Lease Project Cost: $___ (Total Net Present Value cost of lease, including option years, delivery, setup, removal, and associated SRM sustainment and construction costs).

b. Total Net Present Value Purchase Project Cost: $___ (Total Net Present Value cost of purchase, delivery, setup, associated SRM sustainment and construction costs, and removal or demolition of the relocatable building at the end of use.)

c. Cost to construct replacement permanent facility: $___.

d. Other considerations to provide space:

1) Commercial space. Discussion: ___

2) Use or conversion of existing buildings. Discussion: ___

3) Other alternatives considered. Discussion: ___

e. The economic analysis cost is not the Approval Request cost.

(1) The Approval Request cost is only the total lease cost, set up cost, sustainment, and removal cost if included in the lease or the total purchase cost, set up cost and delivery cost for a purchase.

(2) Site Construction costs and removal costs are not to be included in the Approval Request.

10. Relocatable building information by facility type:

Table E-2
Summary of Relocatable Building (Lease or Purchase) Requirement

(a)	(b)	(c)	(d)	(e)
Relocatable Building Type (e.g., barracks, admin, classroom, dayroom, arms room, maintenance, laundry, latrine, storage)	Total Number of Buildings per Type	Total Gross Sq Ft of Each Building per Type	Per Building Purchase Cost	Lease Cost
Total:				

11. Compliance with Standards. Relocatable buildings meet applicable Army Standards:

a. Army Installation Design Standards Yes ☐ No ☐

b. Installation Design Guide Yes ☐ No ☐

c. Force Protection/Anti-terrorism Yes ☐ No ☐

d. Accessibility Yes ☐ No ☐

e. Safety Yes ☐ No ☐

f. Seismic Yes ☐ No ☐

g. Environmental Yes ☐ No ☐

h. Construction codes and standards Yes ☐ No ☐

12. Waiver Request Required. A waiver request is enclosed for each standard in paragraph 8 that is answered "No":

a. Army Installation Design Standards Yes ☐ Not Required ☐

b. Force protection/Anti-terrorism Yes ☐ Not Required ☐

c. Accessibility Yes ☐ Not Required ☐

d. Safety Yes ☐ Not Required ☐

e. Seismic Yes ☐ Not Required ☐

f. Environmental Yes ☐ Not Required ☐

g. Construction codes and standards Yes ☐ Not Required ☐

13. Legal Review. A written legal opinion, performed by the Garrison SJA, has determined that the project is legally sufficient and complies with appropriate regulations. Attached as Enclosure 5. ___.

14. Mandatory Enclosures. The following enclosures are mandatory.

a. Enclosure 1, Justification

b. Enclosure 2, Copies of associated construction documentation replacement Project and Site preparation (DD Form 1391 and, or DA Form 4283)

c. Enclosure 3, Economic Analysis, with sensitivity chart, for each facility type

d. Enclosure 4, Waiver request if in non-compliance with Army Standards.

e. Enclosure 5, Supporting Legal Opinion

f. Enclosure 6, Pictures of the types of relocatable buildings to be used and of their planned placement. This may be photographs of examples of similar relocatable building projects of the same configuration, size, and type of relocatable buildings to be used on this project. This could include photographs, catalogue cuts, and/or artist renderings.

g. Enclosure 7, appropriate site plans.

Spread Sheet Data

General Information					Purchases			
Approval ID	Region	Installation	Title	Army Initiative Supported	OMA Project Approval Cost	Actual OMA Project Cost	OPA Project Approval Cost	Actual OPA Project Cost

Leases			Type and Date				Exit Strategy				
O&M funds obligated for Service Contracts	O&M Funds Obligated for Leases	Cost to Exercise Purchase Option of Lease	Type (Purch-Lease)	Yrs Req'd	Date Approved	Date Acquired	Exit Strategy	Project Title	Project Number	Project Estimate ($M)	FYDP

Detailed RLB Information For RLB projects with multiple PNs, provide number of RLBs for each respective PN									
Total Number of Reloc Buildings	Total Relocatable Buildings SF	BDE, BN, CO OPS	Arms Rms	Maint	Bks	Stor	Admin-Classrm	Med Fac	Other (Dining, Gyms, Latrines)

Enclosure 3

Exemption from Relocatable Building Approvals

The approval process contained in this memorandum does not apply to the following special circumstances and conditions:

(1) **Tents.** Tents are not considered relocatable buildings. A tent is a temporary or semi permanent portable shelter consisting of sheets of fabric or other material draped over or attached to a frame of poles. It is easy to assemble and disassemble. Tents may be attached to the ground with stakes lines or ropes and may be connected to real property utilities. A tent is accounted for as unit equipment or as personal property on an equipment property book and not governed by the relocatable building delegation. Tension Fabric type shelters such as clam shells or Sprung Shelters and other similarly constructed structures which are designed with the exterior fabric as a structural element are not considered tents but are relocatable buildings and are governed by the relocatable delegation.

(2) **Swing Space.** Relocatable buildings obtained as swing space for construction or repair projects which are promptly removed at the conclusion of the project that are funded by the approved real property project and approved on the DA Form 4283 and the DD Form 1391.

(a) Swing space is not to be the major portion of the project scope. Ownership and control of the relocatable buildings remain with the contractor.

(b) When several projects are planned and it is demonstrated that a substantial saving can be made by using swing space to support the entire sequence of projects, the Garrison Commander may approve the relocatable building as a separate action in conjunction with the first project.

(c) The relocatable buildings shall be used only for the duration of the construction or repair projects. They will be promptly removed upon completion of the projects or if any delays are encountered in execution of remaining project.

(3) **U.S. Army Corps of Engineers for support of contracting actions.** Relocatable buildings to be used by the U.S. Army Corps of Engineers to support contracting actions on funded Military Construction projects. The relocatable buildings must be removed immediately upon completion of the contract. The cost of these relocatable building are usually not part of the Military Construction Project and are a Garrison cost. Relocatable buildings are only used when real property facilities are not available. The real property facilities do not need to be located adjacent to the project work sites. The Garrison must locally approve siting and utility support for contractor-provided relocatable buildings, unless prior approval is granted by DAIM-ODC.

(4) **Contractor-owned relocatable buildings.** These types of buildings do not require approval under this policy and must be removed upon completion of the contract. The Garrison must locally approve siting. Utility support for these relocatable buildings will be metered and the costs reimbursed by the contractor.

(5) **Small sheds.** Moveable structures that are 360 sq ft or smaller that are not normally connected to real property utilities are obtained as either real property or as equipment. These small moveable structures are approved and controlled by the

Garrison Commander. Accounting for relocatable buildings is dictated by the manner in which they are acquired. Equipment accountability will be in accordance with AR 735-5, Policies and Procedures for Property Accountability (UIC) and real property is accounted for by AR 405-70, Utilization of Real Property. In addition, each item acquired as equipment will have a sign with unit, POC, phone number and any other information required by the Garrison Commander.

(6) **Training equipment.** This guidance does not apply to equipment used for training such as: Tactical Shelters; Tactical Training Bases (TTB) Structures; Military Operations in Urban Terrain,(MOUT) (reconfigurable trailers); or Training Aid Devices Simulators/ Simulations (TADSS) structures. Equipment in these categories will be accounted for as Unit Equipment as per subparagraph 1 above or as real property.

(7) **Unit allowance lists.** This guidance does not apply to property items that are accountable in table of allowances such as Common Table of Allowance (CTA), table of allowances (TOAs), tables of equipment (TOEs) or modified TOEs, and Table of Distributions and Allowance,(TDA), tents, portable chemical toilets, and family housing.

(8) **Mobile equipment item.** This guidance does not apply to building types and forms that are provided as an integral part of mobile equipment and that are incidental portions of such equipment components, like medical mobile units, communications vans or communications trailers.

(9) **Tactical use centrally managed items.** This guidance does not apply to tactical use relocatable buildings that are centrally controlled and managed.

(10) **American National Standards Institute (ANSI) and/or International Organization for Standardization (ISO) Shipping Containers.** This regulation does not apply to ANSI and or ISO containers owned by the Army and Managed by U.S. Army Materiel Command, Logistics Support Activity (LOGSA) Packaging Storage and Containerization Center (PSCC) AIMPMO (AR 56-4, Distribution of Materiel and Distribution Platform Management)

(11) **Short term requirements (three months or less).** This guidance apply to requirements which support local events some examples follow: Change of Command ceremonies, Deployment/Re-Deployment events; initial fielding of equipment, training exercises, MWR events which support holiday celebration and civilian community interactions, AAFES or Commissary special sales events, etc. Equipment to support these types of events will be exempt from the normal relocatable building process. They will be approved and controlled by the Garrison Commander. The equipment will be promptly removed at the conclusion of the event.

(12) **RDT&E test events.** RDT&E test events lasting less than one year will be exempt from the normal relocatable building process and will be approved by the first General Officer or SES in the chain of command of the testing agency and the Garrison Commander where the test is being conducted. The equipment will be promptly removed at the conclusion of the event.