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**NATO Phase Zero Contracting—A Proposed Strategic and
Operational Planning Construct Within the NATO Framework for
Defense Planning and Standardization**

12 February 2015

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Abstract

NATO, throughout the world, is increasingly called to perform missions and create outcomes that are reliant on contractor support. In fact, contractors perform myriad functions in modern, often complex, international military operations. Additionally, there is increased scrutiny on militaries to become better stewards of scarce resources, to eliminate potential waste, and to reduce abuse of taxpayer money due to poor management, operational redundancy and duplication of effort, and outright corruption. Because of an increased reliance on contractors and recent demands for improved accountability and performance, NATO international military organizations will benefit by incorporating NATO Phase Zero Contracting Operations (N-PZCO), strategic and integrative planning, for contingency and expeditionary operations. The N-PZCO construct fits squarely into the best practices already recognized by NATO, including self-assessment, while ensuring operations are well-planned, coordinated, and executed with respect to the efficiencies and effectiveness mandates of the participants and supporting entities.

Keywords: NATO, contracting, phase zero, best practices, self-assessment, operations planning, coordination, efficiency, effectiveness.



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NATO Phase Zero Contracting—Introduction and Background

Contracting in North Atlantic Treaty Organization (NATO) expeditionary and contingency operations is not a new phenomenon. What is new is the scope and magnitude that contracting and contractors play in today’s NATO military operations. Lack of planning and sound contract integration at the strategic level leads to loss of efficiencies, lack of effectiveness, and, in many cases, outright fraud. NATO has recognized the challenges in building integrity and reducing corruption risks in defense operations—particularly in operations that require myriad multinational, governmental, and private organizations to achieve desired operational results. For example, NATO has hosted several Building Integrity (BI) conferences with the intent to identify, examine, and analyze the causes of risks in contracting and finance operations associated with complex multinational operations.¹ Additionally, NATO has been proactive at creating mechanisms that participating nations may utilize to assess themselves under its published “Integrity Self-Assessment Process—A Diagnostic Tool for National Defence Establishment” (NATO, 2014a).

However, what is clear to many participants in NATO operations is that a more formalized construct of tenets needs to be adopted and employed while maintaining the unique national execution that is hallmark to individual nations. The purpose of this paper is to propose a construct for NATO operational planning by integrating key tenets of sound business operations recognized and documented from NATO BI conferences, while preserving the proper authorities and rights of the participants within NATO operations. The construct includes an adaptation of works published and presented by the authors on Phase Zero Contracting Operations (PZCO), which has been recently adopted by the United States as Phase Zero of Operational Contract Support,² but with the NATO concepts for standardization, which preserve and protect unique national efforts.

¹ The author (Yoder) was co-leader on NATO’s 2013 Building Integrity Conference Syndicate 2 on Budget Execution, Contracting and Reporting, and presenter/panel member on NATO’s 2011 BI Conference—Best Practices and Lessons Learned and Training and Educating for Acquisition, Procurement and Contracting in Defense Institutions, Turning Policy into Practice.

² Operational Contract Support doctrine was established for the U.S. Department of Defense (DOD) in 2008, and has been under cyclical revision to ensure it meets sound operational and business tenets. The U.S. DOD published doctrine is, JP 4-10, *Operational Contract Support*, initial edition 2008, revised edition June 2014 (see Office of the Chairman of the Joint Chiefs of Staff [2014]).



NATO Stands to Gain From Newest Initiatives in Doctrine

NATO, throughout the world, is increasingly called to perform missions and create outcomes that are reliant on contractor support. In fact, contractors perform myriad functions in modern, often complex, international military operations. Additionally, there is increased scrutiny on militaries to become better stewards of scarce resources, to eliminate potential waste, and to reduce abuse of taxpayer money due to poor management, operational redundancy and duplication of effort, and outright corruption. Because of an increased reliance on contractors and recent demands for improved accountability and performance, NATO international military organizations will benefit by incorporating NATO Phase Zero Contracting Operations (N-PZCO), strategic and integrative planning, for contingency and expeditionary operations. The N-PZCO construct fits squarely into the best practices already recognized by NATO, including self-assessment, while ensuring operations are well-planned, coordinated, and executed with respect to the efficiencies and effectiveness mandates of the participants and supporting entities.

The Scope and Magnitude of Contractor Support in NATO Operations

Contracting in support of military operations is not a new phenomenon. What is new is the scope and magnitude that contracting plays in today's NATO operations. Since its first major peace-support operation in the Balkans in the early 1990s, the tempo and diversity of NATO operations have increased. NATO has been engaged in missions that cover the full spectrum of crisis-management operations—from combat and peacekeeping, to training and logistics support, to surveillance and humanitarian relief. Today, approximately 40,000 military personnel are engaged in NATO missions around the world, successfully managing complex ground, air, and naval operations in all types of environments. These forces are currently operating in Afghanistan, Kosovo, the Mediterranean, off the Horn of Africa, and in Somalia (NATO, 2015). Among the highlights indicative of the potential for continued high operating tempo and demands for NATO engagement:

- NATO is a crisis-management organization that has the capacity to undertake military operations and missions.
- The tempo and diversity of operations and missions in which NATO is involved have increased since the early 1990s.
- Currently, NATO has forces operating in Afghanistan, Kosovo, the Mediterranean, off the Horn of Africa, and in Somalia.



- NATO is also conducting air-policing missions on the request of its Allies.
- NATO carries out disaster-relief operations and missions to protect populations against natural, technological or humanitarian disasters. (NATO, 2015)
- Even if global operating tempos decline, many experts believe that reliance on contractor personnel will remain at current levels, or even grow, in relation to the number of uniformed personnel. NATO has existing contracts for support of operations in virtually every sphere of its operational structure, those awarded and managed by individual nations, and contracts awarded through entities such as the NATO Support Agency.³ And, among the NATO alliance of 28 independent member countries, there are also contracts for provisioning and support of operations.

High Reliance on Contracted Support Has Created Challenges

Based on continued public and political pressure to keep organic uniform force structures low, the continued reliance on contract support for military operations is not likely to wane. Nevertheless, this high reliance on contractor support for NATO operations has also created challenges for military planners, operators, contracting units, and even for the contractors themselves. Challenges have manifested in command and control, in integration with NATO's Defense Planning Process (NDPP) operations plans—including logistics and contracting, and in the need for advanced planning, phasing, and timing of contracting events to synchronize with and complement operations plans and capability packages. Particular emphasis must be placed on creating efficiencies and effectiveness in operations, to ensure missions are accomplished with integrity and sound use of scarce resources.

NATO planners must consider communications and movement plans, weapons control, compliance with host nation and status of forces agreements, contract management and oversight, indemnity and insurance of government-contracted personnel, prevention of human trafficking, third-country national labor protections, and issuing and maintaining security clearances, to name only a few.

³ For example, the authors recommend the NATO Budget and Finance (BUDFIN) Division Purchasing and Contracting (P&C) Branch at <http://www.act.nato.int/contracting>, along with the NATO Support Agency at <http://www.nspa.nato.int/en/organization/procurement/contract.htm> for specific examples of NATO procurement and contract actions. Note that specific nations have contracts in support of operations not listed on the two sites referenced.



Additionally, planning must include participants from among the many NATO support structures, planning domains, and associated committees—to include, but not limited to, force, resource, armaments, logistics, C3 (consultation, command and control), civil emergency, air and missile defense, air traffic management, standardization, intelligence, military medical support and science and technology. The Logistics Committee is the senior advisory body on logistics at NATO. Its mandate is twofold: to address consumer logistics matters to enhance the performance, efficiency, sustainability and combat effectiveness of Alliance forces; and to exercise, on behalf of the North Atlantic Council (NAC), a coordinating authority across the NATO logistics spectrum (NATO, 2014b). Contract planning exists primarily within logistics but must be coordinated and synchronized with the other domains as appropriate for capability analysis and provision.

So what can military leaders and planners do to effectively and efficiently manage all of these aspects of contracted support? The incorporation of Phase Zero Contracting Operations—PZCO—into the design and construct of military planning will address many of the challenges identified previously.

NATO Operations Susceptible to Fraud, Waste, and Abuse

The procurement process in the contingency environment can be very prone to fraud, waste, and abuse (FWA), as evidenced in recent NATO operations in Afghanistan, for example. There are numerous reasons why FWA can be a serious problem, including, but not limited to such conditions as temporary or ad hoc contracting organizations, local cultural and business environment, scarcity of contract oversight personnel, use of personnel who have little to no experience with the acquisition process, and pressure to meet mission requirements. NATO commanders at all levels must take a proactive approach to fighting FWA and to conserving resources. Failure to do so can undermine the commander's legitimacy to conduct military operations in a foreign environment and at home. Ethical conduct in the procurement process is particularly important to ensure fair and competitive in-theater acquisition efforts and ensure these processes do not have a negative impact on NATO's mission. Problems affecting any aspect of the acquisition process can affect timely provision of support to the commander and in some cases negatively impact the civil–military aspects of the operation or campaign.

NATO Phase Zero Contracting—Conceptually and Pragmatically

Generally speaking, Phase Zero is generally known as the shaping phase. It has been widely utilized in planning and operational circles to foster political stability



promote democracy and assist nations during non-conflict periods. It has recently been adopted by logistics and contracting communities as the planning and exercising phase. NATO Phase Zero Contracting in the *integrative* strategic planning arena is the advance planning, exercising, and rehearsal of robust contracting support plans designed to complement the NATO Planning Process as a deliberate and purposeful integration of contracting into the broader planning processes. Realistically, the logistics and contracting community along with the other NATO committees and “warfighters” have the same vision for Phase Zero—get the plans in place then rehearse, validate, and update them to reflect current realities.

As a recent example of initial implementation of Phase Zero Contracting within a NATO member country, in the United States, Phase Zero contract planning, and the creation of contracting-specific annexes within operation plans became *mandatory* under the 2008 Defense Authorization Act (GAO, 2011). The strategic concepts were initially published by the U.S. Office of the Secretary of Defense as authorization and supporting guidance under Joint Publication 4-10—*Operational Contract Support*. Within the U.S. DOD, Phase Zero integrated contract planning and creation of specific operations plans annexes for contract support are embedded in statutory requirements (through several years of National Defense Authorization Act legislative requirements) and doctrinally (mostly through Joint Publications, which serve as guidance for planners and executors). Currently, all U.S. Geographic Combatant Commands must create Annex W for its Operation Plans (OPLANs), representing the embodiment of Phase Zero integrative planning. However, despite the mandates, what is particularly disconcerting is that the U.S. Government Accountability Office (GAO; 2011) recently determined that only four out of 39 OPLANs requiring comprehensive Annex W integration plans actually had them.

The low rate of adoption of Phase Zero Contracting and Annex W integration may be a result of the challenges in assimilation and normalization of new doctrine and processes that DOD initially approved in 2008 and continually updated and improved since. Since the Phase Zero Contracting concept is relatively new, there is significant work ahead to get all the GCC OPLAN Annex W support plans in place and exercised. The authors contend that current operational tempos, along with constrained budgets, may preclude achieving fully integrated exercises and rehearsals for all OPLANs, as these rehearsals can carry a huge price tag. However, failure to exercise and rehearse, based on recent and well-documented problems in Iraq and Afghanistan, results in costs that far outweigh the up-front costs to fully vet Annex W plans.



NATO Operations—Integration for Multi-faceted Operations in Diverse Environments

Within NATO spheres of political and operational influence and engagements, proper advanced Phase Zero Contracting must accomplish several overarching objectives. Humanitarian relief, refugee support, economic restoration, security and de-weaponization, democratization, and provision of essential services for food, shelter, safety, security, and medical needs are often provisioned through contract or with assistance from private firms on contract. It's not just NATO and participating nation militaries, or even in some cases, contractors that provide mission essential service and support. Often, NATO mission objectives are enhanced by international organizations outside of NATO and participant governments. Non-governmental organizations (NGOs) and private volunteer organizations (PVOs) may be, and often are, participants in working for the same objectives as NATO. It is proposed that NATO planners and associated logistics and contract planners incorporate and integrate capabilities of these non-NATO participants in planning, where practical, to enhance operational outcomes, reduce redundancies, and help manage scarce resources in pursuit of mutual objectives.

NATO Phase Zero—Complementing Existing NATO Planning Processes

Ultimately, NATO organic and participating nations with contract warrant holders assigned to support NATO missions must be included in the planning, exercise, rehearsal, and execution of the OPLAN. Sound strategy requires the exercise and rehearsal of critical NATO plans through the NATO Planning Process where it is expected it will ultimately be called into action.

The objective is to embed and synchronize the NATO logistics and contracting plans with all elements of the broader operations plans to meet the NATO commander's intent. Properly constructed plans must include elements such as, but not limited to, personnel/organizational structures and authorities; business protocols, including special statutory and regulatory provisions under declared contingencies; scheme of operations; synchronization with the battle plan; oversight; management and auditing; personnel regulations and provisions; spend analysis integration; synchronization with broader strategic objectives; and metrics for assessment of the efficiencies and effectiveness of embedded plans and actions.

From best practices, sound integrating plans should include such elements as, but not limited to,

- Mission statement—from NATO;



- Standardization Agreement (STANAG) provisions including ethical business protocols;
- Primary and secondary customers/supported units and nations;
- Anticipated requirements (in relative time-phase);
- Forces deploying in sequence and duration;
- Operational locations;
- Lead nation or element if joint or combined operations;
- Organization structure (Head of Contracting Activity, Acquisition Review Board, etc.);
- Supported and supporting relationships;
- Command and control relationships;
- Procedures for appointing, training, and employing field ordering officers, contacting officer representatives, disbursing agents, NATO and/or Government Purchase Card holders;
- Procedures for defining, validating, processing, and satisfying customer and supported unit requirements;
- Procedures for budgeting receipt of supplies/services and payments to vendors;
- Procedures for closing out contracting operations and redeployment;
- Supplies and services anticipated locally, local customs, laws, taxes, SOFAs, host nation support, Acquisition Cross Service Agreements, vendor base, etc.;
- Infrastructure, office location, security measures, kits, etc.;
- Security requirements and procedures for contracting and contractor personnel;
- Standards of support—processing times, turn-around-time, Procurement Acquisition Lead Time, and reporting;
- Specific statutory/regulatory constraints or exemptions, special authorities, and programs;
- Relief in place/transfer of authority;
- Contractor restrictions (movement, basing, etc., time-phase specific);



- Guidance on transferring LOGCAP support to theater support contracts by function and/or phase of the operation;
- Special authorities and programs (Commanders Emergency Response Program–Counter Insurgency);
- Post-contract award actions (management, closeout, de-obligation, etc.);
- Contractor support, civil augmentation programs;
- Mandated solicitation and contract provisions; and
- Human trafficking mandates, indemnity, and any additional guidance or legal provisions.

Without a comprehensive planning capability, most missions will be negatively affected.

Three-Tier Model Personnel Structure—Optimizing NATO Staffing

To ensure the efficacy of the integrated plan and to achieve desired mission success while achieving the highest standards of efficiencies, the authors propose a three-tier model (TTM) of personnel structure within NATO and participating nations—where practical.⁴

The TTM is a credential-based personnel hierarchy for contracting officers and planning staff that optimizes the integrative planning, coordination, and execution required for contingency and expeditionary operations at the tactical, operational, and strategic levels of the NATO organization and participating nations.

The model is based on two primary premises: First, mission optimization occurs only with well-credentialed contracting planners and executors. Second, optimized stakeholder integration, including, for example, operational commanders, supporting units, and NGOs and PVOs, can only be accomplished by utilizing well-credentialed participants in the planning and execution phases.

The three-tier model has *specific personnel credentials* in three primary areas: (1) training and education, (2) certification (such as NATO or participating nation credential, security clearance requirements, etc.), and (3) experience. The three tiers are described in the following paragraphs.

⁴ The YTTM (Yoder Three-Tier Model) was presented at the NATO BI Conference, 2011, by the author. Its concepts and construct were adopted within the U.S. Army in 2008, based on it being referenced and utilized in the Gansler Commission Report—*Urgent Reform Required* (Commission on Army Acquisition and Program Management in Expeditionary Operations, 2007).



Tier One—the ordering officer serves at the lowest level. This contracting level has several identifying attributes. Tier One personnel reside within the tactical level of the military hierarchy and are the most prevalent contracting personnel within most formal military and civilian organizations. The Tier One personnel are junior civilians and military staff. They operate at the tactical and unit levels and perform no integrative planning at the operational and strategic levels. Tier One personnel place basic orders and conduct simple transactions. In the broadest terms, there is little stakeholder integration being initiated or managed at this level. However, this lowest level is absolutely essential because it represents where a majority of “in-the-field” contracting actions are conducted. Tier One is the tactical level of the enterprise. Particular importance at Tier One is placed on standardized training, emphasizing protocols, ethical conduct, management, control, and oversight, all of which are critical for establishing and maintaining integrity in business operations.

Tier Two is in the middle of the hierarchy. Tier Two leverages the capabilities of contracting officers who serve at the operational level—either in the field or in staff functions such as planners. The Tier Two personnel require enhanced credentials. These personnel conduct complex contracting transactions and leverage local economy assets. They may perform all functions of Tier One personnel, but with increased credentials, scope, and responsibilities. The TTM calls for Tier Two personnel to be mid-level civilians, mid-grade officers, or credentialed senior enlisted personnel. They can be integrated into planning and local operations, performing some integrative planning at the tactical and operational levels, and they can perform some liaison functions with broader stakeholders. Their main mission is to optimize local operations in harmony with NATO’s strategic guidance. They will also prepare required contracting support annexes for operations plans when serving on an Allied Task Force (ATF) staff during crisis action planning. Tier Two personnel serve at the operational level of the organization. As such, these personnel require expertise in the protocols, ethical conduct, management, control and oversight, conduct of complex negotiations, broad business acumen in complex military contracting, and within the U.S. DOD, for example, Phase I and II Joint Professional Military Education (JPME I & II) are required. They should be integrated into operational staffs and planning cells in order to provide necessary expertise and insights regarding the contracting requirements of allied operational plans.

Tier Three personnel are the highest and most crucial tier in the TTM, and titled integrated planner and executor (IPE) by the authors, although the actual name is not as important as the functions performed (see Figure 1). This tier is at the strategic level of military and civilian organizations. The IPE is a flag officer or senior civilian position. It calls for the highest credentials to include, but not be limited to, for example, the highest level of military education, highest contract warrant authority,



advanced education such as a master’s or doctorate degree, and highest security clearance level as appropriate. In the TTM briefed to the NATO Building Integrity Conference in 2011 and 2013, the author, Yoder, provided an example of those credentials for a NATO U.S. provisioned officer, which included Joint Professional Military Education (JPME I & II), DAWIA Contracting Level III certification and warrant (or international equivalent), a graduate degree or higher, a top secret security clearance, and experience in operations and contracting gained through experiential tours or assignments.

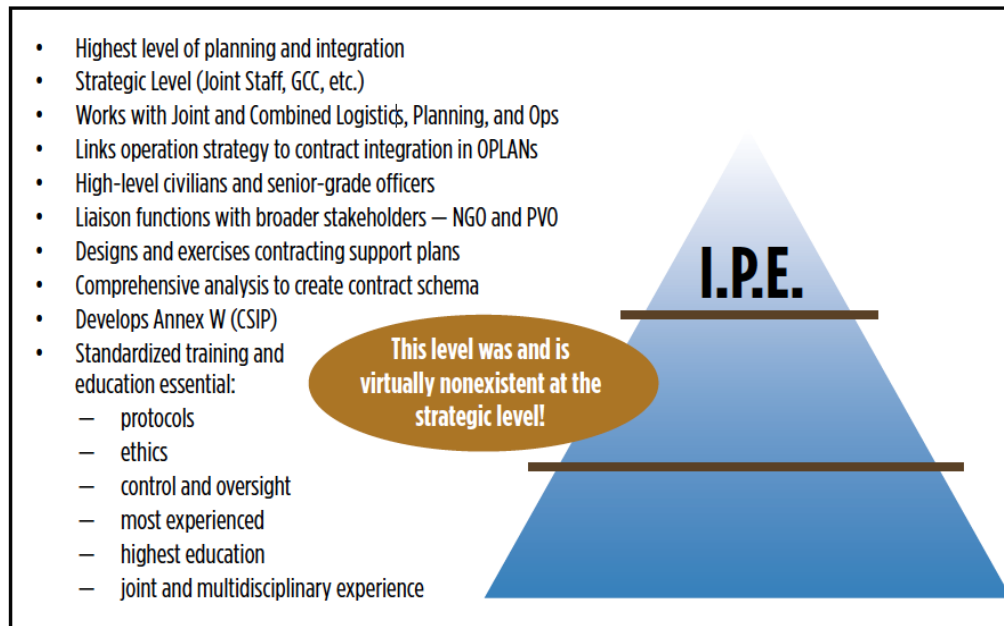


Figure 1. Three Tier Model – Top Tier I.P.E.
(Yoder, Nix, Long, 2013, pg. 356)

The Tier Three IPE must be strategically positioned within the NATO organization to achieve the highest levels of integrative planning and must have appropriate level of staffing.

The IPE’s primary mission is creating and validating a comprehensive contracting plan to complement all elements of the OPLAN. Ideally, the IPE position should be placed within the SHAPE NATO planning staff, along with logistics, and at the highest operational and planning staffs within each supporting and contributing nation.

The IPE will create and validate the operational contracting support plan, complementing logistics capability provision plans both in OPLANs and Concept Plans (CONPLANs). Because of the complexity and magnitude of the tasks involved in creating and validating comprehensive plans, the IPE requires a supporting staff

and subordinate expertise in key strategic and analytical areas, such as OPLAN analysis, logistics assessments, contracting, and similar professional disciplines.

Of note, most participating national organizations do not have a dedicated contracting IPE (by any moniker) within their organizational structure. Traditionally, the logistics organizations have embedded contracting officers. However, the contracting positions within most logistics staffs, or within traditional logistics organizations, have been utilized as adjunct positions to the broader logistics functional planning. Additionally, the relatively low military rank and lack of seniority of the contracting personnel on logistics staffs often lack both the credential and the clout to effectively execute the requirements demanded of the Tier Three IPE position. In fact, until recently, the U.S. Army lacked senior Tier Three personnel in functional positions as indicated herein. It was only after huge losses of accountability and business integrity failures in Iraq and Afghanistan operations that the U.S. Congress mandated the integration of senior officers with the credential and experience to work on operations planning, which includes contracting integration. Prior to the mandates of 2008 and beyond, there was little to no true contract planning within the logistics branches.

NATO Committee Involvement for Optimal Results–Standardization

How can NATO Phase Zero concepts and the Three-Tier Model be adopted and fully functional as doctrine? The Committee for Standardization (CS) is the senior NATO committee for Alliance standardization, composed primarily of representatives from all NATO countries. Operating under the authority of the North Atlantic Council (NAC), it issues policy and guidance for all NATO standardization activities (NATO, 2011). At NATO, standardization is the process of developing shared concepts, doctrines, procedures, and designs to achieve and maintain the most effective levels of “compatibility, interchangeability and commonality” in operations, procedures, materials, technology, and administration. The primary products of this process are Standardization Agreements (STANAGs) between member countries. The Committee for Standardization is the senior authority of the Alliance responsible for providing coordinated advice to the NAC on overall standardization issues (NATO, 2014b).

For NATO, standardization is the development and implementation of concepts, doctrines and procedures that aim to achieve and maintain compatibility, interchangeability, or commonality needed for interoperability. Interoperability is the ability to work in synergy in executing assigned tasks and can greatly increase the effectiveness of NATO’s operations and activities through a more efficient use of resources. The Committee for Standardization meets twice yearly and reports



annually to the NAC on standardization activities. It was created in 2001 to oversee the work of the NATO Standardization Organization, which resulted from the merger of two separate standardization bodies, one civilian and one military.

According to Dr. Cihangir Askit, Director, NATO Standardization Agency, in his paper titled, *Smart Standardization: A Historical and Contemporary Success at NATO*,

NATO views standardization as a process whereby doctrine, as well as tactics, techniques and procedures, is developed in harmony. This process enables the Allied nations to operate effectively together while optimizing the use of resources. In the end, the aim of standardization is to facilitate interoperability, and thus enhance the Alliance's operational effectiveness. (Aksit, 2014, pg. 1)

NATO Phase Zero and the Three-Tier Model can be brought into full utilization within the NATO Planning Process. The authors contend that adoption of these constructs will mean enhanced integrity, mission effectiveness, and efficiencies from better planning and execution by credentialed personnel. These constructs and doctrines fit squarely within the "smart standardization" ideal. Dr. Askit posited,

Standardization within NATO can be viewed just like any complex system. Remarkably, nations' strategic commands come together by having the lessons learned from NATO exercises, real-world operations, operational readiness inspections/ evaluations, creating voluntarily the standards, institutionalizing them in a Standardization Agreement (STANAG) and making them a habit. This is a 60-year normative success of NATO. We may call this "smart standardization." In conclusion, the NSA serves as a catalyst for nations' subject-matter experts (SMEs) to come together and create written standards and definitions according to operational requirements. As NATO standards are promulgated, they become institutionalized within nations and thus become a habit.

Standardization management is a living system, which requires inputs, processes, outputs and feedback. In addition, we can also add to this list quality control (user satisfaction). As seen in the figure below, all components are functional and relevant for NATO.



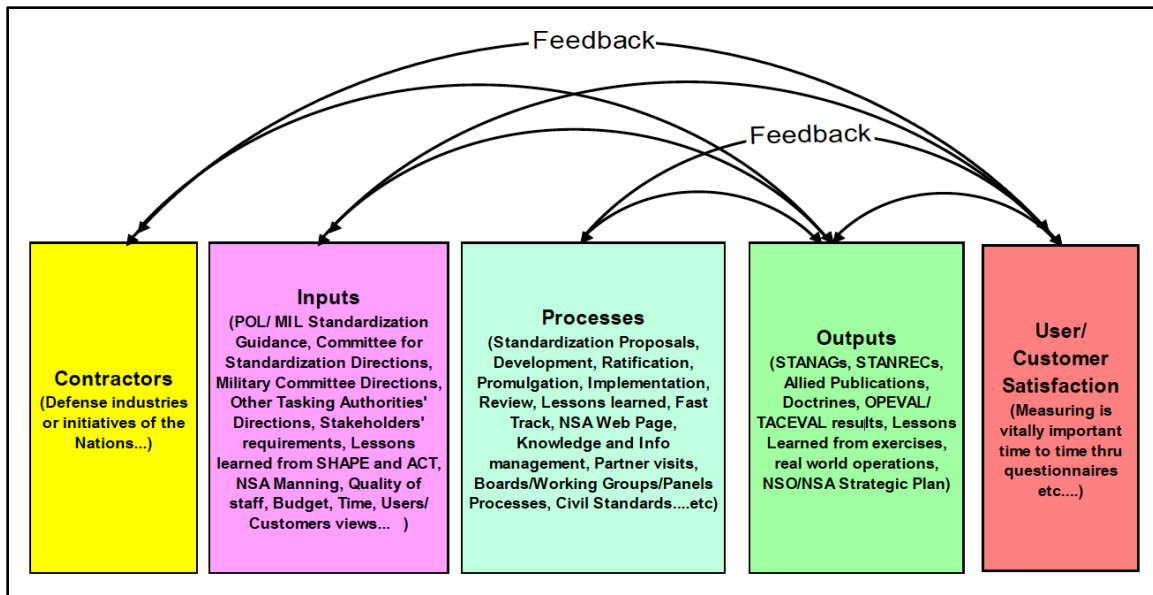


Figure 2. NATO Standardization
(NATO Standardization (Askit, 2014, p. 3))

NATO STANAG—Moving from Concept to Practice within NATO

The authors propose that NATO create a STANAG to include operations planning and execution doctrinal constructs and tenets including those presented herein. Additionally, as briefed to senior NATO leaders at the 2013 NATO Building Integrity Conference by Syndicate 2—“Reducing Corruption Risks in Budget Execution, Contracting and Acquisition through Investments in Integrity, Transparency, and Accountability,” and Syndicate 4—“How Should NATO Prepare for Future Operations? What are the Best Practices and Lessons Learned from Theatre?” the best means to establish NATO accepted protocols, doctrine, and associated personnel structures is via the STANAG (see *Building Integrity Conference Proceedings*, 2013).

The NATO collaborative process of creating a STANAG to incorporate the Three-Tier and Phase Zero concepts more formally into the NATO planning process will allow for better planning in a system that already has demonstrated prowess. And, critical to business operations integrity, the STANAG creation can incorporate tenets of ethical and sound business practices in contracting and finance—making the tenets germane to NATO operations planning constructs and actual mission executions. Currently, NATO borrows tenets from existing non-NATO, albeit well recognized and regarded organizations such as Transparency International for its ethical tenets of operation. Creating agreed-upon standards via STANAG is essential moving forward. The STANAG as part of NATO collaborative planning can

recognize and respect individual national sovereignty. Full adoption of the Phase Zero and Three-Tier model along with their benefits, can only be achieved with the collaborative process required to establish a NATO STANAG. This, the authors contend, is the best means to adopt the concepts presented, and to achieve those intended benefits aimed at improving business, contracting, and financial integrity and associated effectiveness and efficiencies.



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