

Government



From  
MBA USA

A newsletter for GSA Certified Safe and Vault Technicians and GSA Approved Inspectors.

This email newsletter is being sent to you because you have attended one of the GSA training courses at MBA USA or have requested to be added as a recipient.

**Comments and opinions are solely that of the writer and are not intended to represent the General Services Administration, the US Government or any product manufacturer.**

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#### MAKING SENSE

Keeping up with changes in regulations and requirements

For many years, the DoD Lock Program has published a newsletter titled *Security Facts*. Recently I received the latest issue (32) and found some interesting articles.

Pages 2 and 3 contain a short article on the black label phase-out plan. It is good to get the word out as far and wide as possible on the phase-out.

Page 4 has an article explaining that, in spite of being an "Optional Form", Optional Form 89 is not optional for use. This is the maintenance record for GSA containers and vault doors. If you were to look up a description or definition of an Optional Form, you would find it described as non-mandatory. However, a maintenance record for GSA containers is mandatory. It is required in accordance with FED-STD-809. So Optional Form 89 is not optional anymore. There is mention in the article that GSA is reviewing this form to remove the word, "optional". (Yaaayyy)

Pages 8 and 9 have an article about inspections. This is the real hard part to keep up with. The article refers to the Air Force and their inspection requirement. It states that the Air Force is the only service that requires periodic inspections on its GSA approved security containers and vault doors. That is not really accurate. The Army, has a requirement in Army Regulation (AR) 380-5, paragraph 6-10. Federal Standard 809D, paragraph 4.1 describes a periodic inspection that should be done throughout the government on all GSA containers and vault doors. I do not intend to criticize the writer of the article or anyone else. As I mentioned before, this is the real hard part to keep up with. It takes time to put together and publish the newsletter, so the article itself was probably written before the "every 5 years" requirement for these inspections was removed last April.

### **Now, back to the Air Force.**

Several years ago, the USAF had Air Force Instruction (AFI) 31-401. Paragraph 5.23 of this instruction mandated maintenance procedures for GSA containers by following the instructions in Air Force Technical Order (TO) 00-20F-2. This TO required the performance of a preventive maintenance inspection (PMI) every five years for GSA containers and every two years for vault doors (4 b. (3)). AFI 31-401 and TO 00-20F-2 required PMI's and other maintenance to be recorded on AFTO form 36. That was the Air Force's maintenance record at the time.

### **Moving forward.**

AFI 31-401 was replaced by AFI 16-1404 on 29 May 2015. This new AFI rescinded the TO that required the periodic PMI's and AFTO 36. Two- and five-year PMI's were replaced by Operational Visual Inspections (OVI) to be performed every 5 years. AFTO 36 was replaced by Optional Form (OF) 89 so the Air Force would begin to use the same form everyone else

used for their maintenance record. AFI 16-1404 included guidance on transitioning from AFTO 36 to OF 89. If an existing AFTO 36 had no entries, it was to be replaced with a new OF 89. If an existing AFTO 36 had maintenance entries, it should remain with the container, but an OF 89 should be added for future entries.

### **Moving forward again.**

On 23 December 2020, a mashup of Department of Defense Manual (DoDM) 5200.01, Volume 3 along with parts of AFI 16-1404 was released. This combined guidance was called Department of the Air Force Manual (DAFMAN) 16-1404, Volume 3. I mentioned this in my newsletter of 15 November 2021. I think the idea here was to ensure personnel did not look only at their service's AFI and overlook the DoD Manual above it. In looking at the Air Force added paragraphs, the OVI's are included and they were to be performed every 5 years. The same as in AFI 16-1404.

### **Moving forward yet again.**

DAFMAN 16-1404, Volume 3 was revised on 12 April 2022. I'll say it again, this is the real hard part to keep up with. In this revision, the paragraph requiring the OVI's to be conducted every 5 years has been omitted. The OVI's are still to be conducted. They just omitted the "how-often" part.

As the disclaimer above says, these comments and opinions are my own. I'm not trying to speak for the Air Force or anyone else. I'm just trying to make some sense out of the ever changing guidance that I pass on to my students and anyone else who will listen. My guidance is that, In accordance with FED-STD-809D, paragraph 4.1, *"Each approved container and vault door (including locking mechanism) will be thoroughly inspected for cleanliness and serviceability prior to being placed in use and periodically during its serviceable life as specified by local policy."* Each office, activity, command, etc. should come up with their timeframe for preventive maintenance as they see fit. It should be regular and periodic, but some containers or vault doors get used more often than others.

You will find links below to web pages where you can download *Security Facts* from the DoD Lock Program and the Directives and Guidance page on the DoD Lock Program's website where you can download DAFMAN

16-1404, Volume 3.

Regards,

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