



INFORMATIONAL MEMORANDUM FOR: Federal Excess Personal Property Program Managers and Property Management Officers.

THROUGH:  
(if required)

FROM: Melissa Frey  
National FEPP Program Manager

SUBJECT: Cannibalization and Modification of FEPP equipment  
FILE CODE: 3120/6410-4

ISSUE:

**Cannibalization and Modification of Federal Excess Personal Property (FEPP)**

It is common and permissible for state agencies to request cannibalization of FEPP that is no longer useful or economical to repair in the property's current condition. Often the word cannibalization is used when the intent is to modify the item for fire fighting purposes. The Federal Excess Property Management Information System (FEPMIS) permits the state agency to easily request permission from the Forest Service Regional Property Management Officer (PMO) to perform either of these tasks. Requests for these functions can be made on acquisition of the equipment or at a later date by requesting a "Change of Status" in FEPMIS.

**Questions asked when authorizing cannibalization of FEPP equipment.**

1. Is the item operational in its current condition?
  - The FEPP program does not permit taking an operational piece of equipment and making it inoperable just for the sake of obtaining parts. Cannibalization is only authorized on equipment that is non-operational.
2. Does the state agency currently have like property items?
  - The parts removed through cannibalization may be removed to keep another piece of FEPP fire fighting equipment in service.
3. Will the state agency cannibalize the item in a timely fashion (within 5 years)?
  - It is not permissible for the state agency to have a "bone yard" of FEPP property. Cannibalized FEPP cannot be kept for an unlimited amount of time, parts need to be removed from the FEPP property and stored in a warehouse or storage building.
  - Usable FEPP property should be secured and protected from the elements.
  - The carcass must be reported for ultimate disposal in a timely manner.
4. Are parts that are removed from a Cannibalized item for use in another Federal inventory item?
  - If the estimated acquisition value of an item removed from a FEPP piece of equipment is valued at \$5,000 or greater, it must be placed on the Federal Inventory if



not immediately placed into another piece of FEPP equipment or reported for disposal.

- Engines for vehicles 2 ½ ton or larger must be placed on Federal Inventory unless installed in another piece of FEPP equipment.
5. Are parts with an estimated value below \$5,000 for use on a Federal Inventory item?
    - If the item is usable, the state agency may place the items in a storage location or install on a piece of FEPP equipment. The items do not need to be accounted for on the Federal Inventory unless the item is not being used on a FEPP item.
    - If the item has a resale value as a usable item or for scrap metal content, the state agency must request disposal from the Forest Service.
  6. How long can I take to cannibalize an item?
    - The state agency will determine the time frame for cannibalization when the request is placed in FEPMIS, time requested will be included in the “comments” section of the Change of Status request.
    - A request cannot exceed 5 years.
  7. What must be done if the cannibalization is not completed within 5 years?
    - The FS PMO will revisit the request and determine if every attempt was made to complete cannibalization. The FS PMO may authorize, in writing, a 1 year extension if the situation requires additional time.
    - The state agency must make every attempt to remove all possible usable parts from the item prior to the 1 year extension expiration.
  8. Can the state agency buy the item from the State Agency for Surplus Property (SASP) or GSA sales?
    - Yes - If the item is still available after internal screening and GSA transfer screening.

### **Questions asked when authorizing modifications to FEPP equipment.**

1. Is the item going to be used for its intended use?
  - Operational property must be acquired to be used for its intended purpose, i.e. – an operable dump truck cannot be acquired to be made into a tanker.
2. If the item is not operable and requires parts to make it operational for its intended use, can it be obtained modification?
  - Yes
3. How do you track parts that are removed?
  - If the estimated acquisition value of an item removed from a FEPP piece of equipment is valued at \$5,000 or greater, it must be placed on the Federal Inventory if not immediately placed into another piece of FEPP equipment or a disposal request is submitted. I.e. engines for vehicles 2 ½ tons or larger.
  - If the item has a resale value as a usable item or for scrap metal content, no matter what the original acquisition value is estimated to be, the state agency must request disposal from the Forest Service.
4. What will be done with parts with an acquisition value below \$5,000?
  - The items do not need to be accounted for on the Federal Inventory individually unless the item is not being used in the FEPP program.



- If the item has a resale value as a usable item or for scrap metal content, the state agency must request disposal from the Forest Service.
5. How long can I take to modify an item?
- Typically within one year of receipt of the item, unless otherwise specified by the state agency.

### DISCUSSION:

Processes' necessary to approve the state agencies request for cannibalization and modification of FEPP equipment.

### SUMMARY

Cannibalization or Modification of FEPP equipment can be requested from the Forest Service prior to the approval by the Regional Property Management Officer (PMO). Before approving a request for cannibalization or modification, the PMO will need to ensure the state agency is aware of the guidelines and processes' set forth in the FEPP program. Approval of either of these requests can be done on the Transfer Document (SF 122) when the intent of the state agency is clearly stated on acquisition. If the state agency decides to perform either of these functions after acquisition, a request for change of status must be completed by the state agency prior to cannibalization or modification of FEPP equipment. The PMO will determine if the FEPP equipment meets the criteria listed above prior to approval of the request.

cc: Marion Hammon, Lewis F Southard, Richard Kvale, Melissa Frey

