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Policies and Procedures

Title: Procedures for Paying for Off-the-Shelf Training

Number: 213.4

Date: September 19, 2011

Originating Office: Acquisition and Property Division, AFM/ARS

This Replaces: **P&P 213.4**, dated August 10, 2007

Distribution: REE Offices in Headquarters, Areas, and Field Locations

This P&P is revised to update the procedures for paying for off-the-shelf training to include the revised simplified acquisition threshold of \$150,000 and the Financial Management Modernization Initiative (FMMI). Please be reminded that this P&P is not by itself a complete document, as it must be used in conjunction with P&P 440.1, Employee Training and Development, dated July 21, 1998.

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1. Introduction

This policy establishes procedures for paying for commercial (off-the-shelf) training priced at \$150,000 or less.

2. References

- Office of Personnel Management Training Policy Handbook: Authorities and Guidelines -
(http://www.opm.gov/hrd/lead/pubs/handbook/Training_policy_hndbk04.pdf)
- Civilian Agency Acquisition Letter 99-2 – Governmentwide Commercial Purchase Card Purchases Above the Micro-Purchase Dollar Threshold -
(<http://www.acquisition.gov/comp/caac/caacletters/cl99-02.pdf>)
- Departmental Regulation 5013-6 – Use of Purchase Cards and Convenience Check –
(<http://www.ocio.usda.gov/directives/doc/DR5013-006.htm>)
- Executive Order No.11348 – Providing for the Further Training of Government Employees – (<http://cpol.army.mil/library/permis/7eo11348.html>)
- Title 5, Chapter 41, United States Code, Training
(<http://uscode.house.gov/download/pls/05C41.txt>)
- Parts 410 and 412, Title 5, Code of Federal Regulations –
(http://www.gpo.gov/nara/cfr/waisidx_04/5cfr410_04.html) and
(http://www.gpo.gov/nara/cfr/waisidx_04/5cfr412_04.html)
- Treasury Financial Manual Part 4, Chapter 4500 –
(<http://www.fms.treas.gov/tfm/vol1/v1p4c450.txt>)
- ARS/AFM/HRD P&P 440.1 – Employee Training and Development –
(<http://www.afm.ars.usda.gov/ppweb/PDF/440-01.pdf>)

3. Definitions

Commercial (Off-the-Shelf) Training. A commercial program, course, or instructional service that is deliverable without modification/alteration or development resulting in increased cost to the Government.

Micro-Purchase Threshold. The micro-purchase threshold is as follows for non-procurement cardholders: \$3,000 for supplies, \$2,000 for construction, and \$2,500 for services. For this P&P, the \$2,500 threshold for services applies.

Non-procurement cardholder. An individual that has been delegated authority to use the purchase card up to the micro-purchase threshold.

Simplified Acquisition Threshold. A dollar amount not to exceed \$150,000 for supplies and services.

Training Approvers. The manager or supervisor that is authorized to approve and/or recommend short- and long-term training for employees who report to them. Refer to P&P 440.1, Section 4, dated July 21, 1998.

Vendor Code. A unique number to reflect the proper remit address for the payment in the Financial Management Modernization Initiative (FMMI). In general, the vendor code should not be based upon the address that was associated with registration or the company address.

4. Background

According to the Office of Personnel Management (OPM) Training Policy Handbook, agencies may use an authorized training form to procure and certify payment of training. The Department of Agriculture has designated the Standard Form (SF)-182 as that instrument. AgLearn provides an automated Authorization, Agreement, and Certification for Training, SF-182. The provisions of FAR Part 13 do not apply when using the SF-182, including any synopsis and posting requirements. In addition, a requisition is not required when using the SF-182.

5. Conditions for Using the SF-182

The SF-182 is authorized for use under the following conditions:

- The training cost of a single training event, program, or instructional service does not exceed the simplified acquisition threshold (\$150,000).

- The cost is based upon a commercially published price list per student, course, program, or service; and,
- The program, course, or instructional service is off-the-shelf.

6. Policy

It is Research, Education, and Economic's (REE) policy that:

- The purchase card is the preferred method to pay for training under \$2,500.
- The SF-182 shall be approved by an authorized training approver/fundholder other than the cardholder and shall be used to document and approve all training. Copies of the SF-182 shall be forwarded to the appropriate training designees to ensure that their training is recorded.
- To pay for training over \$2,500, the SF-182 form must be forwarded to the appropriate payment office listed in Section C.6, Billing Instructions.
- A copy of the approved SF-182 is to be kept in the cardholder's purchase card file as supporting documentation.
- A requisition is not required when using an SF-182 for off-the-shelf training since its use would be redundant.
- Offices shall consolidate SF-182's for employees attending the same course at the same time (when appropriate) and forward them to the appropriate payment office listed in Section 7 when the total cost exceeds \$2,500.
- If the training vendor does not accept payment by purchase card, forward the SF-182 to the appropriate payment office listed in Section C.
- Prior to procuring/paying for off-the-shelf training, cardholders are to ensure that:
 1. The cost does not exceed the cardholder's single purchase limit; and
 2. The SF-182 has been signed by an authorized training approver/fundholder.

- If a course does not meet the off-the-shelf requirements (i.e., customized training is needed to meet an agency's needs), the training must be acquired through your local Procurement Office. To obtain customized training, offices must process a requisition through the Integrated Acquisition System, along with a detailed statement of work, list of deliverables, and desired delivery dates.

7. Billing Instructions

In block C.6 Billing Instructions, of the SF-182, enter the appropriate billing address for the training facility to forward the invoice. Also, enter the FMMI vendor code and document reference number in block C.4 of the SF-182 to ensure prompt payment. The originating office or training designee must request a copy of the FMMI Vendor printout from the Budget Analyst or ABFO. If the training vendor has not been added in the FMMI system, the originating office or training designee must work with the Budget Analyst or ABFO to obtain specific information from the vendor so that the Vendor Code can be added.

For Federal vendors ONLY: The National Finance Center (NFC) is under a reimbursable agreement with ARS; therefore, when forwarding an SF-182 training form to NFC for processing, block C.4 must contain a purchase order (PO) number generated by NFC from the FMMI system. For additional information on completing an SF-182 for a Federal vendor, contact the AgLearn Human Resource Specialist at arsaglearn@ars.usda.gov.

PAYMENT OFFICES

Agricultural Research Service

- **All ARS Offices, except for Beltsville Area, Pacific West Area, and Southern Plains Area**
 USDA, OCFO
 Controller Operations Division, ACPRB
 ARS Operations Section
 P.O. Box 53326
 New Orleans, Louisiana 70153

(SPECIAL INSTRUCTIONS FOR ARS OFFICES USING THE ARS OPERATIONS SECTION AS THE PAYMENT OFFICE)

Forward the SF-182 to the ARS Operations Section upon signature of the training approver along with a screen print (preferred) of the VEND record. This is used to enter an obligation into FMMI so that funds are set aside until such time as the invoice is received from the vendor per the billing instructions in block 6.

- **ARS, Pacific West Area**
USDA-ARS-PWA
Area Finance Office
800 Buchanan Street
Albany, CA 94710-1105
- **ARS, Southern Plains Area**
USDA-ARS-SPA
1001 Holleman Drive, East
College Station, Texas 77840-4117

Economic Research Service (ERS)

Acquisitions
355 E Street, SW, 7th Floor
Washington, D.C. 20029
FAX: 202-245-4846

National Institute of Food and Agriculture (NIFA)

FMD/FOB/OSII
STOP 0307, Portals Building, Suite 580C
Washington, D.C. 20024

National Agricultural Statistics Service (NASS)

NASS/DAFO/BASO
1400 Independence Avenue
Room 5053 South Bldg.
Washington, D.C. 20250

(SPECIAL INSTRUCTIONS FOR NIFA ONLY)

To pay for training over \$2,500, each Unit will complete the SF-182 and obtain the necessary signatures. A document control number (DCN) should be assigned to the SF-182. The Unit will forward the completed SF-182 to their Financial Management Division (FMD) Accounting Technician. FMD will input into FMMI a manually entered obligation document (known as an MO).

For block 6, Section C – Costs and Billing Information, each Unit will identify their respective address. Once the Unit receives an invoice, the invoice should be reviewed and signed by the Unit's Deputy Administrator. After signature, the invoice should be forwarded to FMD for payment processing. FMD will input into FMMI a payment document, known as a PV, referencing the MO originally established. This will initiate payment.

LARRY R. CULLUMBER
Director, Acquisition and Property Division