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Policies and Procedures

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

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This Replaces: Bulletin 02-402, dated February 11, 2002

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

This P&P establishes procedures for paying for off-the-shelf training within the simplified acquisition threshold (\$100,000 or less). 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, dated July 21, 1998.

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1. Introduction

This policy establishes procedures for paying for commercial (off-the-shelf) training priced at \$100,000 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 Checks – (<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, Government Employees Training Act – (http://www.access.gpo.gov/uscode/title5/partiii_subpartc_chapter41_.html)
- 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/440-01.htm>)

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 \$100,000 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 (usually a nine-position Taxpayer Identification Number, plus an alpha/numeric Alternate Address Code indicator, to reflect the proper remit address for the payment that is being processed) in the Foundation Financial Information System (FFIS). In general, the vendor code should not be based upon the address that was associated with registration or the company address.

4. Background

Bulletin 02-402, Payment Methods and Procedures for Processing Training Requests, dated February 11, 2002, provided updated procedures for processing training requests and making payments in the FFIS. This bulletin also prescribed procedures for using the purchase card to pay for training, specifically to commercial vendors. Commercial training is generally referred to as “off-the-shelf” training.

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. 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 (\$100,000).
- 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 REE's 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 7, Billing Instructions.
- When reconciling the transaction in the Purchase Card Management System (PCMS), the cardholder should enter the following information in the Item Description block in PCMS: "Payment is in accordance with guidance issued in P&P 213.4." 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 7.
- 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 Section C – Costs and Billing Information, block 6 of the SF-182, enter the appropriate billing address for the training facility to forward the invoice. Also, enter the vendor code and document reference number in block 4 of the SF-182 to ensure prompt payment. If the vendor code is not known, contact the FFIS REE Vendor Coordinator for your specific office or Area. A list of vendor coordinators is in Exhibit 1.

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 FFIS 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, Beltsville Area**
 USDA-ARS-BA-BARC-WEST
 10300 Baltimore Avenue

Rm. 301
Beltsville, Maryland 20705

- **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

Administrative and Financial Services Unit
Budget Execution
1800 M Street N.W.
Room N4186
Washington, D.C. 20036
FAX: 202-694-5757

National Agricultural Statistics Service

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

Cooperative State Research Education and Extension Service

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

(SPECIAL INSTRUCTIONS FOR CSREES 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 FFIS 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 FFIS a payment document, known as a PV, referencing the MO originally established. This will initiate payment.

JAMES H. BRADLEY
Deputy Administrator
Administrative and Financial Management

Exhibit

Exhibit 1

FFIS REE VENDOR COORDINATORS

Office/Area	Vendor Coordinator	Email Address
REE	Angelia Fleming Loggie	Angelia.FlemingLoggie@ars.usda.gov
AFM, APD	Kathy Newton Shelia Tucker	kathy.newton@ars.usda.gov sheila.tucker@ars.usda.gov
AFM, FMD	Jeanette Powers Mary Lewis	jeanette.powers@ars.usda.gov mlewis@ars.usda.gov
AFM, FD	Regina Herchak	regina.herchak@ars.usda.gov
NAL	Elizabeth Jackson	ejackson@nal.usda.gov
BA	Angela Wingert Teresa Wertz Nancy Gatdula	Angela.Wingert@ars.usda.gov Teresa.Wertz@ars.usda.gov Nancy.Gatdula@ars.usda.gov
MSA	Linda Robinson Huron Virden	linda.robinson@ars.usda.gov huron.virden@ars.usda.gov
MWA	LaShay Brown Robert Miller	lbrown@mwa.ars.usda.gov millerr@mwa.ars.usda.gov
NAA	Eileen Dolfman Joyce Hamilton	eileen.dolfman@ars.usda.gov joyce.hamilton@ars.usda.gov
NPA	Linda Sundstrom	linda.sundstrom@ars.usda.gov
PWA	Debby Cummings Lisa Jackson-Beitia	dcumming@pw.ars.usda.gov lbeitia@pw.ars.usda.gov
SAA	Vali Jean Farmer	valjean.farmer@ars.usda.gov
SPA	Anduin Jaster Freida Williams	ajaster@spa.ars.usda.gov fwilliams@spa.ars.usda.gov
ERS	Michael Moffett	mmoffett@ers.usda.gov
NASS	Dien Nguyen	dnguyen@nass.usda.gov
CSREES	Allison Opicka	Allison.opicka@ars.usda.gov