



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

SEP 21 2010

Department of the Interior Acquisition Policy Release (DIAPR) 2010 - 24

Subject: Procurement of Training

1. **Purpose:** This Policy Letter revises Department of the Interior-wide policy allowing non-procurement personnel to purchase commercially available off-the-shelf training using the Standard Form 182, Authorization, Agreement, and Certification of Training (SF-182).
2. **Effective Date:** Effective upon issuance.
3. **Expiration Date:** This DIAPR cancels DIAPR 1997-4, *Department of the Interior Contracting Officers Warrant Manual*, amends DIAPR 2010-09, *Department of the Interior Contracting Officer Certificate of Appointment Program Manual*, and supplements DIAPR 2008-8, *Entering Accurate Procurement Data Reporting to the Federal Procurement Data System – Next Generation (FPDS-NG)*. This DIAPR remains in effect until cancelled or superseded.
4. **Background and Explanation:**
 - a. In accordance with DIAPR 1997- 4, training coordinators with the Department of the Interior (DOI) and its bureaus and offices have been allowed to purchase commercially available off-the-shelf training up to \$25,000 via the use of the SF-182 as delegated by the Bureau Procurement Chief.
 - b. The DOI Certificate of Appointment (COA) Manual, DIAPR 2010-09, requires that non-contracting personnel must have a Federal Acquisition Certification – Contracting (FAC-C) certification and a Level 1A COA in order to make purchases through the use of the charge card above the micro-purchase level (\$3,000).
 - c. The Office of Personnel Management (OPM) Training Policy Handbook states that agencies may use the SF-182 to procure and certify payment of training through government or non-government facilities. The form is certified by training officers and supervisors instead of a Contracting Officer under negotiated procedures.
 - d. The OPM Training Policy Handbook additionally states that the SF-182 may also be used for requesting, approving, and certifying payment for attendance at meetings, conferences, seminars, and symposia where the primary purpose is to train employees to meet a performance improvement related need. This form is *not* used to purchase general supplies, training equipment, or non-training services.

5. Action Required:

- a. The SF-182 may be used by training officers (non-warranted personnel) in accordance with the OPM Training Policy Handbook and as reflected in the DOI COA Manual, to procure training via the use of the SF-182 up to the simplified acquisition threshold of \$150,000, under the following conditions to enroll students, obligate funds, and authorize payment for tuition:
- The training cost of a single training event, program, or instructional service does not exceed the simplified acquisition ceiling established in the Federal Acquisition Regulation;
 - The cost is of a fixed nature; i.e., price per student or price per course, program or service; and,
 - The program, course, or instructional service is off-the-shelf, and no modification or development resulting in increased cost to the Government is needed to meet the organization's needs.
- b. The purchase of training for any coursework requiring course development or off-the-shelf courses exceeding the simplified acquisition threshold must be acquired by a Contracting Officer with the requisite warrant authority.
- c. Payment for training services, through the use of the Government charge card by non-warranted personnel is limited to the micro-purchase threshold of \$3,000.
- d. Procurement of training via the use of the SF-182 is not required to be entered into FPDS-NG. Purchases made by a Contracting Officer must be entered into the FPDS-NG system.
- e. The SF-182 may also be used for requesting, approving, and certifying payment for attendance at meetings, conferences, seminars, and symposia where the primary purpose is to train employees to meet a performance improvement related need. This form is *not* used to purchase general supplies, training equipment, or non-training services.

6. Information Contact: Questions regarding this DIAPR should be directed to Melodee Stith, Associate Director, Acquisition and Financial Assistance at 202-208-5830 or by e-mail at melodee_stith@ios.doi.gov.



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