



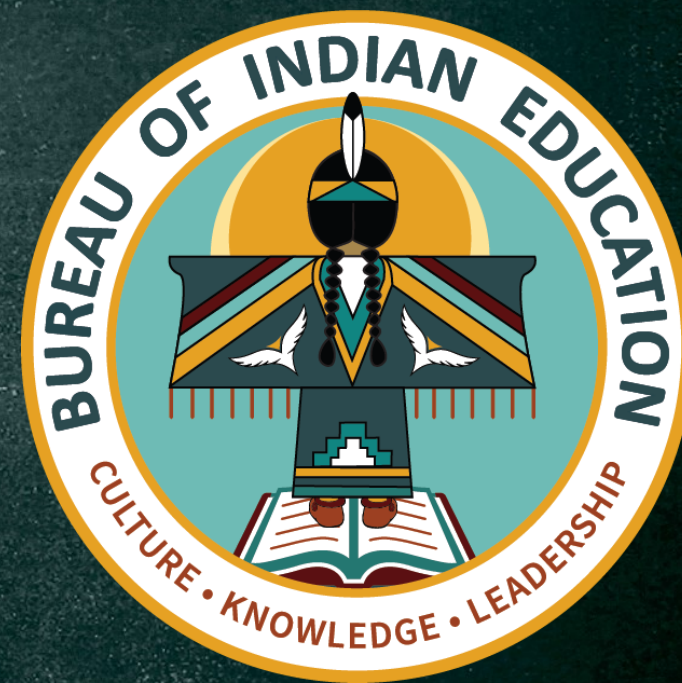
U.S. Department of the Interior
Bureau of Indian Education

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PRINCIPAL LEADERSHIP ACADEMY

AUGUST 2022

School Operations
Division of Acquisitions Presentation



PURCHASE OF TRAINING

PRESENTERS:
LASHONDRA WYNN, PROCUREMENT ANALYST
RYAN GEFFRE, CHIEF CONTRACTING OFFICER



PURPOSE

To provide an overview on DOI-AAAP-0052 which establishes the Department of Interior (DOI) policy on the purchase of training from commercial vendors; it includes implementation of qualification and certification standards for officials who purchase training.



SCOPE

➤ This policy applies to the purchase of training from **commercial vendors** by DOI bureaus and offices. This includes but is not limited to:

- Paying to send employees to training courses
- Paying to bring instructors to DOI to deliver courses
- Purchasing proprietary materials for instructional purposes, such as textbooks, manuals, and other course material

NOTE: Coaching, facilitation, and training that is purchased from government agencies (including DOI) are outside of the scope of this policy.



SCOPE CONTINUED...

- This policy outlines the following:
 - Which individuals have the authority to authorize training
 - Which individuals have the authority to obligate funds for procuring training
 - The appropriate process and/or form to use for both transactions



PURCHASING TRAINING

- The SF-182 authorizes employees to take training and documents the financial obligation or funds for procuring training.
- Each of these two functions MUST be performed by an individual who has authority to perform the function.
- In some case the same individual may have the authority to perform both functions. In other cases, it may be multiple individuals.
- The person who obligates the funds must have procurement authority, regardless of the dollar amount of the transaction.

Note: The SF-182 is not an appropriate form for documenting procurement obligations in all cases.



PURCHASING TRAINING

- The process of purchasing training, to include group training, is separate from the authorization of training, although in some cases, the purchase may involve the same form.
- The dollar amount of the transaction determines who has the authority to obligate funding for the transaction and the mechanism, process, and procedures that must be followed to purchase the training.
- Specific questions regarding how the total amount should be calculated (e.g., in the case of group training) should be resolved in consultation with a Contracting Officer.
- The person authorizing the purchase of training (e.g., Contracting Officers) may not be the one processing the obligation in FBMS; however, no obligatory transaction may be completed in FBMS without the express approval of an employee authorized to purchase training in accordance with the policy.



AUTHORIZING TRAINING REQUESTS

All requests for an employee to attend training must be authorized in writing by the employee's supervisor. The format for the authorization can vary depending on the training, e.g., email, SF-182, or DOI Talent.

- Requests for under \$10k are the discretion of management
- Requests over \$10k must include an approved SF-182



AT OR BELOW \$10K

- **Individual with authority to purchase training:** Any purchase card holder or individual with higher level procurement authority.
- **Required processes and procedures:** Award to any selected vendor at a fair and reasonable price. Methods to determine whether price is fair and reasonable are as follows:
 - Market Research
 - Comparison of proposed prices with prices found reasonable previously
 - Current price lists, catalogs or advertisements (inclusion of the aforementioned does not, in and of itself, establish fair and reasonableness)
 - Comparison with similar items in a related industry
 - Personal knowledge of the item being purchased
 - Comparison to an Independent Government Estimate
 - Any other reasonable basis
- **Purchase approval documentation:** Approved charge card purchase request with supporting documentation.



\$10K - 25K

- **Individual with authority to purchase training:** Training ordering official or individual with higher level procurement authority.
- **Required processes and procedures:** Award to any selected vendor at a fair and reasonable price. (See slide 9 for methods to determine fair and reasonableness).
- **Purchase approval documentation:** SF-182 approved by Training Ordering Official or individual with higher level authority (e.g. Contracting Officer).
- **Purchase method:** A miscellaneous obligation with the signed SF-182 attached as the authorizing documentation.



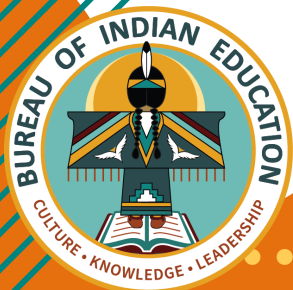
\$25K - 50K

- **Individual with authority to purchase training:** Senior Training Ordering Official or an individual with a higher-level procurement authority.
- **Required processes and procedures:** Award to the best-value vendor after consideration of at least three sources; ensure consideration of small business sources to maximum extent practicable; maintain document of the process by using the record of training purchase template (add snippet of purchase template).
- **Purchase approval documentation:** SF-182 approved by Senior Training Ordering Official or Contracting Officer and record of training purchase.
- **Purchase method:** A miscellaneous obligation with the signed SF-182 and record of training purchase attached as the authorizing documentation.



ABOVE \$50K

- **Individual with authority to purchase training:** Contracting Officer.
- **Required processes and procedures:** The Federal Acquisition Regulation (FAR) must be followed in its entirety.
- **Purchase approval documentation:** The appropriate standard form under the FAR.
- **Purchase method:** Use the purchase order transaction type in FBMS.



LIMITATIONS ON AUTHORITY (TERMS AND CONDITIONS)

Prior to authorizing any purchase of training, any terms and conditions the vendor requests the government accept must be reviewed. If they are not consistent with standard Government terms and conditions, the Contracting Officer or the Solicitor's Office must be consulted prior to authorizing the obligation.



UNAUTHORIZED TRAINING

- Training not commercially available at a firm fixed price
- Training requiring negotiations except for accepting a discount
- Training materials or courses being developed or created
- Any training that requires modification or tailoring and increases the price

These training requests must be sent to Contracting via a purchase request (PR) in FBMS.



SF-182 APPROVAL PROCESS

- 1) Requiring office fills out the SF-182, obtains supervisory approval
- 2) Requiring office sends the SF-182, training quote, supplemental training information to BIE Finance
 - Include financial analyst & bie_miscobligations@bia.gov
- 3) Finance will work with the school on questions and finalizing the SF-182
- 4) Finance submits the SF-182 to BIE Acquisitions for Review and approval
 - Send to BIE_SF182Approvals@bie.edu
- 5) A Contracting Officer will review and approve (if appropriate) in the training officer's signature block and return the SF-182 to finance to complete the obligation
- 6) Finance will provide an approved copy back to the requiring office



Points of Contact

1st line POCs: Financial Analyst assigned to school/program

Include bie_miscobligations@bia.gov

SF-182 Approvals or to Ask a Contracting Officer a Question

Email: BIE_SF182Approvals@bie.edu

Inbox is only used for receiving final approval from an individual with higher level procurement authority. All documents and other approvals must be received prior to submitting to this inbox.

Designated Contracting Officers to review and approve SF182s

Raelynn Her Many Horses

Raelynn.Hermanyhorses@bie.edu

Contracting Officer

Natasha Bitsoi

Natasha.Bitsoi@bie.edu

Contracting Officer

2nd Line POCs: Contracting Leadership

Darren Nutter

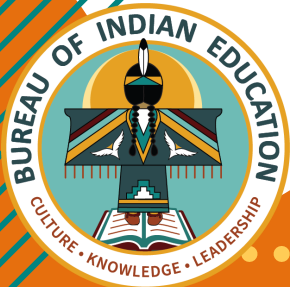
Darren.Nutter@bie.edu

Lead CO (Goods & Services)

Ryan Geffre

Ryan.Geffre@bie.edu

Chief Contracting Officer



QUESTIONS?



CONTRACTING OFFICER REPRESENTATIVES



COR LEVELS

- **COR Level I**
 - 8 Hours of Training
 - This level of COR is generally appropriate for simple, low-risk contract vehicles, such as supply contracts and orders. This level does not require a subject matter expertise (SME) in the field generally.
 - Examples: Wireless Service, Copier Maintenance, Utilities, supply orders, etc.
- **COR Level II**
 - 40 Hours of Training and 1 year of COR Experience
 - This level of COR is generally appropriate for contract vehicles of moderate to high complexity and risk, including both supply and service contracts. Requires a level SME.
 - Examples: Special Ed, IT, Construction, Facilities, etc.
- **COR Level III**
 - 60 Hours of Training and 2 Years of COR Experience
 - Level III CORs are the most experienced CORs within an agency and should be assigned to the most complex, critical risk, and mission critical contracts within the agency. These CORs are often called upon to perform significant program management activities and should be trained accordingly. Requires a level of SME and PM.
 - Examples: Major operational contracts (eLMS, NASIS, etc.), major construction contracts, etc.
- Refer to <https://www.fai.gov/certification/fac-cor/contracting-fac/fac-cor-certification-requirements> for COR training requirements and other information.



BIE COR GOALS

- All BOS K-12 schools should have the following:
 - At least 1 COR level 1
 - COR level 2s specific to their requests and areas of specialty (i.e. facilities work, IT work, Special education services, etc.)
- BIE Offices and Programs
 - COR level 1s adequate to support their office
 - COR level 2s and 3s sufficient to meet specific requirements and areas of specialty
- Current Levels
 - BOS = Only 14 schools have a certified COR 1 (25% of total)
 - BOS = Only 3 schools have a certified COR 2 (5% of total)



POINTS OF CONTACT

- Interested in becoming a COR?
 - Email Ashlyn Sloan at Ashlyn.Sloan@bie.edu and identify if you are interested in taking level I or II
 - Through CSOD, one can take a free, self-paced, online level 1 course
- Already taken COR training but not certified?
 - 1st – Create an account DAU, Cornerstone OnDemand (CSOD)
 - <https://id.dau.edu/login/login.htm>
 - 2nd – Upload training certificates, resume if applicable, other requested info
 - 3rd – Submit application for review/approval
 - Questions? Contact Daryl Brooks at Daryl.Brooks@bia.gov
- Not sure what level of COR you should pursue?
 - Contact your school's assigned Contracting Officer or LaShondra Wynn to discuss further.



COR RESOURCES

- ☐ FAI COR Toolkit - <https://www.fai.gov/resources/cor-toolkit>
- ☐ Acquisition Gateway - <https://hallways.cap.gsa.gov/app/#/doclib?document=8305>
- ☐ FAC-COR Competency Model
- ☐ Indian Affairs COR Academy - Coming soon
 - ☐ Will be a SharePoint site on the IA network (must be connected to VPN to access)
- ☐ A COR Guide to Responsibility - Quick Reference by Virtual Acquisition Office



QUESTIONS?



REMINDER

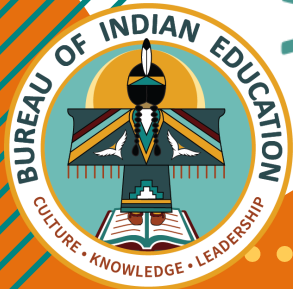
- All purchase request (PR) cutoff dates have passed
- Enter all new PRs in October, after FBMS blackout
- If your current PR is at risk of not being awarded before the end of the FY, you will be notified by someone in contracting



ACQUISITION POINTS OF CONTACT

- **1st line**
 - **Contact your school's Contract Specialist/Contracting Officer**
- **2ND line**
 - **Contact the Lead Contracting Officers**
 - **Goods & Services – Darren Nutter**
 - **Construction and A&E – Dawn Sekayumptewa**
- **COR, Policy, SFA, SB and other related questions?**
 - **Contact LaShondra Wynn, Procurement Analyst**





Mvto HiyHiy LemLmts Wado
DaWaEh Miigwech Wopila
Pinangigi Wimblahoho
Quyana Baasee AnaaBasee
Ahéhee HiriweTudahe
Pilamiya
Nya:Weh Aho
Thank You Tansi