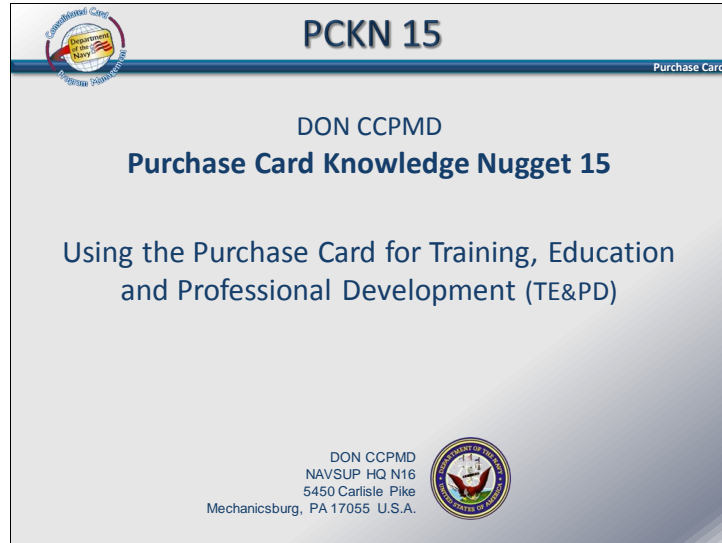


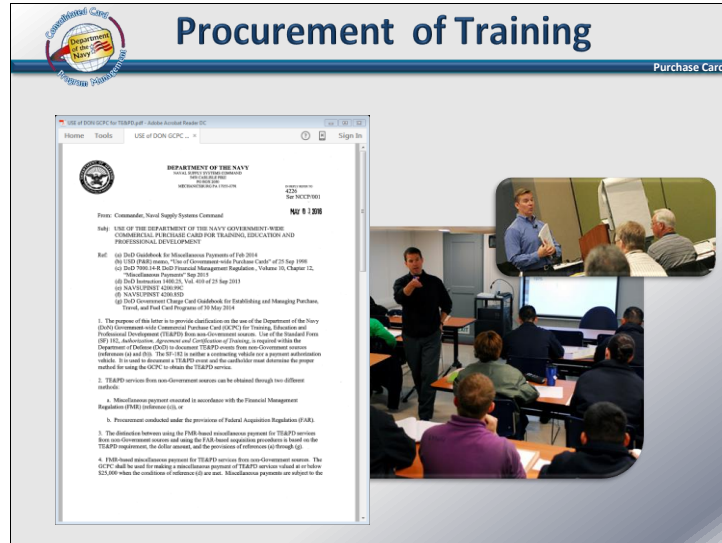
DON CCPMD Purchase Card Knowledge Nugget
PCKN 15 - Training Education & Professional Development



This DON Consolidated Card Program Management Division Purchase Card Knowledge Nugget will review the Department of Defense and Department of the Navy Policy for Using the Purchase Card for Training, Education, and Professional Development from non-Government sources.

DON CCPMD Purchase Card Knowledge Nugget

PCKN 15 - Training Education & Professional Development



A letter from NAVSUP dated May 3, 2016 explains how to use the Purchase Card to obtain Training, Education and Professional Development services from non-Government sources.

We will look at how and when to use the two primary processes used to obtain training, they are known as Financial Management Regulation or FMR and Federal Acquisition Regulation or FAR.

The FMR method utilizes the Purchase Card for an approved Miscellaneous Payment in accordance with Financial Management Regulation.

The FAR method uses the acquisition procedure outlined in the Federal Acquisition Regulation.

This approach includes using the Purchase Card for Micro-Purchases as well as a Method of Payment.

This training presents several scenarios to provide you with examples of the correct procedure to obtain training.

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Before we move forward here are some acronyms and their definitions that we will be using. Some you may be familiar with, so I won't read the whole list but want to point out the ones we will use frequently.

GPC is the Government Purchase Card, most of the time we will refer to this as Purchase Card,


FAR is the Federal Acquisition Regulation,

FMR is the Financial Management Regulation,

And MPT is the Micro-Purchase Threshold.

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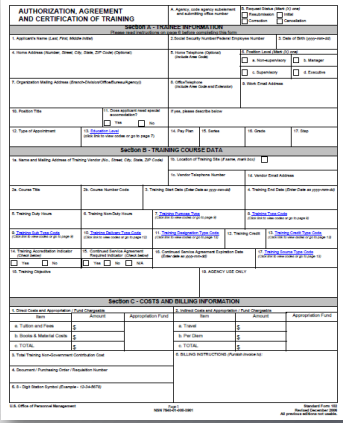


DOD Policy

Purchase Card

Use SF-182 to
document training
from non-Government
sources

*Source: DODI 1400.25,
Volume 410*




SF-182

Let's start with the SF 182.

The SF-182 is the Office of Personnel Management form.

The Department of Defense requires the form to document Training, Education, and Professional Development events from non-Government sources.

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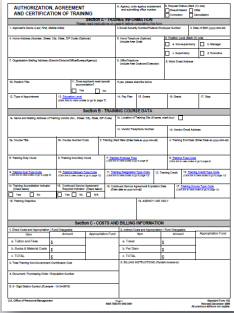


SF 182

Purchase Card

Authorization, Agreement, and Certification of Training


- Document the Training, Education and Professional Development event
- **Cardholder must determine** how to use the GPC to obtain the service



SF-182

The SF-182 is used to document a training event and the Cardholder must determine the proper method for using the Purchase Card to obtain the service.

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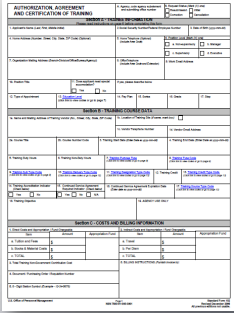


SF 182

Purchase Card

Authorization, Agreement, and Certification of Training

- Document the Training, Education and Professional Development event
- **Cardholder must determine** how to use the GPC to obtain the service
- **NOT** a contracting vehicle




SF-182

The SF 182 is neither a contracting vehicle

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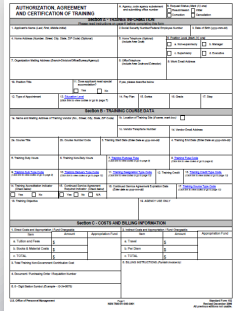


SF 182

Purchase Card

Authorization, Agreement, and Certification of Training

- Document the Training, Education and Professional Development event
- **Cardholder must determine** how to use the GPC to obtain the service
- **NOT** a contracting vehicle
- **NOT** a payment authorization

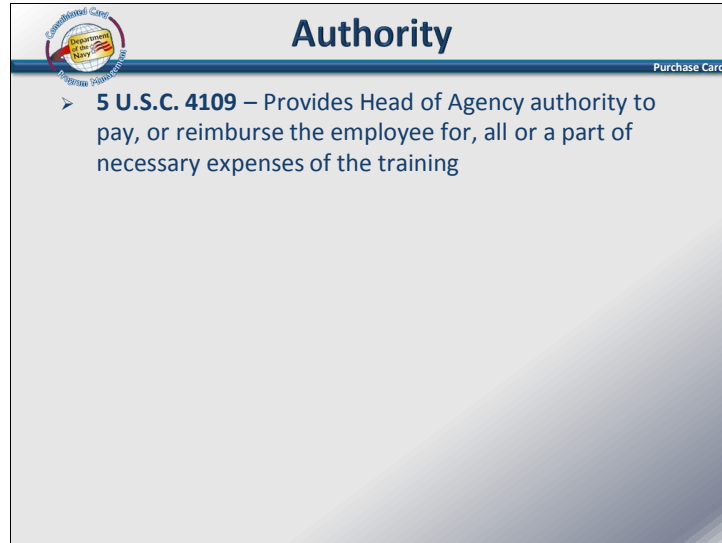


SF-182

Nor is it a payment authorization vehicle.

The SF 182 only authorizes the attendance to the training - it does not authorize the use of the GPC.

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Authority


5 U.S.C. 4109 – Provides Head of Agency authority to pay, or reimburse the employee for, all or a part of necessary expenses of the training

Using a Purchase Card to pay for training can be complicated.

This is because the authority governing the use of the card is found in multiple instructions and regulations and the correct procedure for use is predicated on the conditions of the training event.

Let's start with Code 5 U.S.C. 4109, which gives the head of an agency the authority to pay for training and makes Training, Education and Professional Development services a valid expense of the US Government.

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Authority


Purchase Card

- **5 U.S.C. 4109** – Provides Head of Agency authority to pay, or reimburse the employee for, all or a part of necessary expenses of the training
- **FMR Volume 10, Chapter 12** – Provides authority for Miscellaneous Payments of TE&PD both as a direct reimbursement to employee and payment to non-Government sources

The FMR provides authority for making Miscellaneous Payments for valid expenses of the Government that are not subject to the Competition in Contracting Act.

It is important to note that the FMR provides procedures for making a Miscellaneous Payment for Training, Education & Professional Development as a reimbursement to the employee. However; the preference is to make the payment directly to the non-Government source that provides the service.

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Authority


Purchase Card

- **5 U.S.C. 4109** – Provides Head of Agency authority to pay, or reimburse the employee for, all or a part of necessary expenses of the training
- **FMR Volume 10, Chapter 12** – Provides authority for Miscellaneous Payments of TE&PD both as a direct reimbursement to employee and payment to non-Government sources
- **DOD Instruction 1400.25, Volume 410** – Provides policy and conditions to make a Miscellaneous Payment for TE&PD services directly to a non-Government source

The FMR refers to DOD Instruction 1400.25, Volume 410 to provide direction regarding how to make the payment directly to the service provider.

This same instruction requires that specific conditions be met in order to use the Purchase Card for Training, Education & Professional Development as a Miscellaneous Payment.

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Authority

Purchase Card

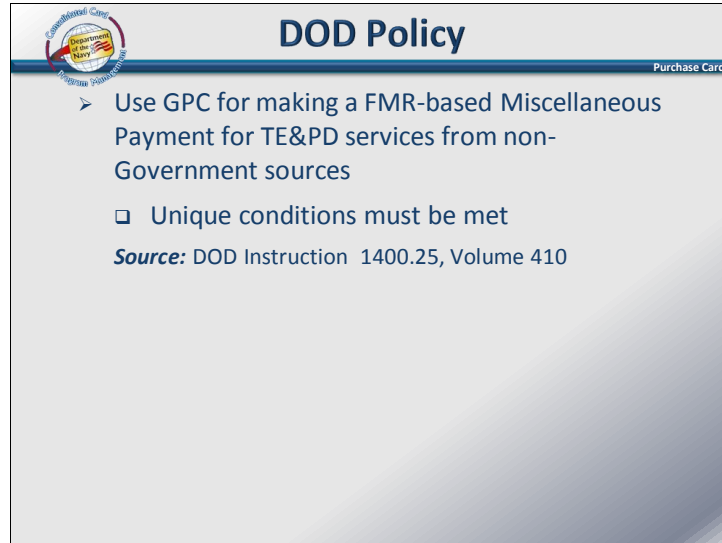
- **5 U.S.C. 4109** – Provides Head of Agency authority to pay, or reimburse the employee for, all or a part of necessary expenses of the training
- **FMR Volume 10, Chapter 12** – Provides authority for Miscellaneous Payments of TE&PD both as a direct reimbursement to employee and payment to non-Government sources
- **DOD Instruction 1400.25, Volume 410** – Provides policy and conditions to make a Miscellaneous Payment for TE&PD services directly to a non-Government source
- **FAR Part 13** – Provides authority for Simplified Acquisition and Micro-Purchase of services

If these conditions are not met, then the service is subject to the Competition in Contracting Act and the Cardholder must use FAR Part 13 procedures to acquire the service.

The FAR contains both Micro-Purchase and simplified acquisition procedures.

NAVSUPINST 4200.99 series further amplifies the FAR and its applicability within the Department of the Navy.

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DOD Policy


- Use GPC for making a FMR-based Miscellaneous Payment for TE&PD services from non-Government sources
 - ❑ Unique conditions must be met

Source: DOD Instruction 1400.25, Volume 410

DOD policy is to use the Government Purchase Card to make FMR-based Miscellaneous Payments for Training, Education and Professional Development services from non-Government sources.

Because the preference is to pay the vendor or educational institution directly as opposed to reimbursing the employee, the FMR refers to this DOD Instruction.

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DOD Policy

Purchase Card

- Use GPC for making a FMR-based Miscellaneous Payment for TE&PD services from non-Government sources
 - ❑ Unique conditions must be met

Source: DOD Instruction 1400.25, Volume 410
- Use the GPC for a FAR-based acquisition when the TE&PD event does not meet all the FMR conditions
 - ❑ Up to current Micro-Purchase Threshold
 - ❑ As Method of Payment on a contract


Source: FAR Part 13 & DFARS Subpart 213

Again – the DOD Instruction has unique conditions which must be met in order to make the Miscellaneous Payment.

When these conditions are not met due to the nature of the Training, Education & Professional Development event, then the Cardholder must use a FAR-based process such as a Micro-Purchase of services or a Method of Payment on a contract.

Next – let's look at the unique conditions that must be met in order to make a Miscellaneous Payment.

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Miscellaneous Payment

Purchase Card

Use the GPC for Miscellaneous Payment of TE&PD from a non-Government source, in concert with an approved SF 182, up to \$25,000, **ALL** three of the conditions must be met without exception:

Condition One:

Cardholder has the proper delegated authority and is trained to make a Miscellaneous Payment for TE&PD services

The first of three conditions is fairly straight forward.


The Cardholder must have specific authority for Training, Education & Professional Development Miscellaneous Payments, sometimes listed as SF 182 authority in their Letter of Delegation.

Additionally the Cardholder must be trained to make a Miscellaneous Payment for the TE&PD services.

This training satisfies that requirement.

Let's take a look at the second of the three FMR conditions.

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Miscellaneous Payment

Purchase Card

Use the GPC for Miscellaneous Payment of TE&PD from a non-Government source, in concert with an approved SF 182, up to \$25,000, **ALL** three of the conditions must be met without exception:

Condition Two:

The TE&PD event is for a **regularly scheduled, off-the-shelf** TE&PD service **available to the general public** and **priced the same for everyone in the same category**, i.e., price per student, course, service, or training space

The second of the three conditions requires some clarification.

What does the policy mean by “Regularly Scheduled” “off-the-shelf” or “priced the same for everyone”?

Let’s take a closer look at these terms starting with “Regularly Scheduled.” In general terms this means that the TE&PD event can be found in an established offering, whether in print or on-line.

The event does not have to be held on a scheduled date and time if the training provider makes it available at any time, such as an on-line course.


An “off-the-self TE&PD service available to the general public” is defined as a commercially available TE&PD event or a planned series of the same event, activity, service, or material requiring no modification prior to use. Such training may occur on or off federal property and may include non-federal employees.

“Priced the same for everyone in the same category”, means it is priced the same per student, course, service, or training space. In other words, the same event is offered at an equal price to all customers.

Lastly, as a reminder of DOD policy, if the Government has a need for tailored training or tailored training materials, the requirement must be placed on a Government contract by a warranted Contracting Officer.

A Cardholder must NEVER sign any vendor written terms and conditions that would financially bind the Government without proper authority.

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Miscellaneous Payment

Purchase Card

Use the GPC for Miscellaneous Payment of TE&PD from a non-Government source, in concert with an approved SF 182, up to \$25,000, **ALL** three of the conditions must be met without exception:

Condition Three:

For purchases exceeding the Micro-Purchase Threshold but not exceeding \$25,000 (excluding travel and per diem of student), a price comparison is completed to determine price reasonableness, and the source selection is justified and documented

The last condition has a few points that also require some clarification.

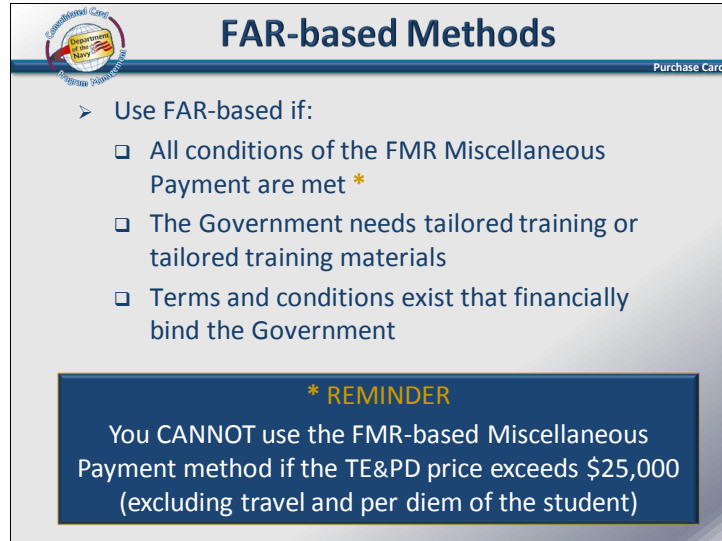
When purchasing Training, Education & Professional Development using the FMR Miscellaneous Payment process, AND the cost is between current Micro-Purchase Threshold and \$25,000, there is a requirement to do a price comparison and the source selection is to be documented.

Because the price reasonableness determination and documentation is a requirement from the DOD Instruction in Personnel Management, and because the Instruction does not provide a definition or an outline of a process; this requirement is subject to reasonable interpretation and does NOT require FAR based competition practices.

This requirement can be satisfied by simply documenting the decision making process in sufficient detail so the documentation can defend the decision in which the Government paid a fair and reasonable price.

Remember, part of the price reasonableness determination is for the TE&PD service to be available to general public and priced the same for everyone in the same category. Ask yourself – if I were paying for this from personal funds, would I be satisfied that the cost is fair and reasonable?

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The slide is titled "FAR-based Methods" and includes a logo for the Department of the Army Professional Development. It lists three conditions for using FAR-based methods, followed by a reminder box.

FAR-based Methods

Use FAR-based if:

- ❑ All conditions of the FMR Miscellaneous Payment are met *
- ❑ The Government needs tailored training or tailored training materials
- ❑ Terms and conditions exist that financially bind the Government

*** REMINDER**

You CANNOT use the FMR-based Miscellaneous Payment method if the TE&PD price exceeds \$25,000 (excluding travel and per diem of the student)

To use FAR-based methods you must consider the next three points:

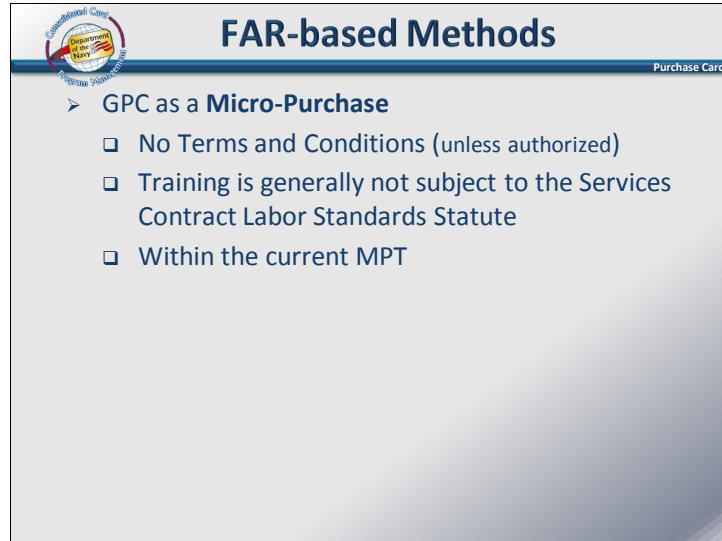
First - Have you met all conditions for using FMR Miscellaneous Payment?

Second – Does the Government need tailored training or tailored training materials?

And third - Are there terms and conditions that will financially bind the Government?
Then your second option is to use the Government Purchase Card through FAR-based methods.

Just a reminder - You CANNOT use the FMR-based Miscellaneous Payment method if the TE&PD price exceeds \$25,000 (excluding travel and per diem for the student)

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The slide is titled "FAR-based Methods" and features a logo in the top left corner for the Department of Defense, Office of the Inspector General. The text on the slide is as follows:

- GPC as a **Micro-Purchase**
 - ❑ No Terms and Conditions (unless authorized)
 - ❑ Training is generally not subject to the Services Contract Labor Standards Statute
 - ❑ Within the current MPT


One FAR-based method is a Micro-Purchase with the Purchase Card.

Remember, when making a Micro-Purchase for training, all the FAR rules apply.

This means you must adhere to Micro-Purchase Thresholds or limits specified in your Letter of Delegation and there can be no Terms and Conditions (without proper authority) associated with the procurement.

Training is generally considered a professional service that is not subject to the Services Contract Labor Standards Statute, so the purchase limit is concurrence with the current the Micro-Purchase Threshold for training.

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FAR-based Methods

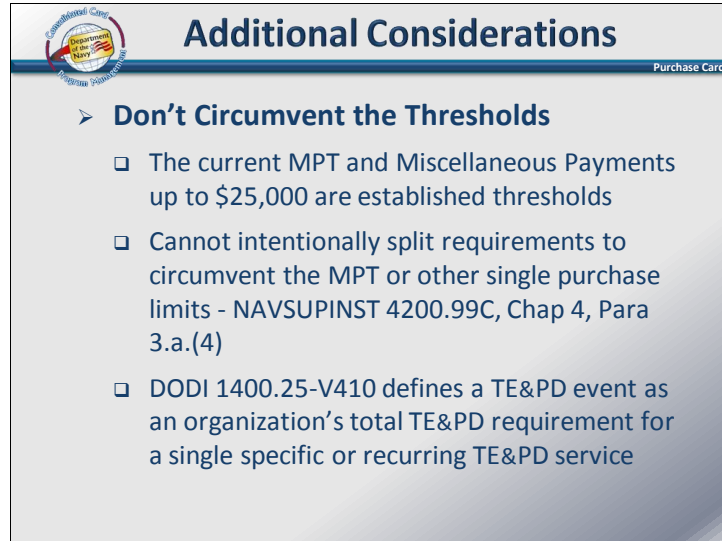
Purchase Card


- GPC as a **Micro-Purchase**
 - ❑ No Terms and Conditions (unless authorized)
 - ❑ Training is generally not subject to the Services Contract Labor Standards Statute
 - ❑ Within the current MPT
- GPC as a **Method of Payment**
 - ❑ On an established contracting vehicle
 - ❑ Any training requiring specific Government Terms or Conditions OR if Government has a need for tailored training or tailored training materials, is referred to a Contracting Officer

You should send the requirement to Contracting when the cost exceeds the Micro-Purchase Threshold, if it requires specific Government terms and conditions that financially bind the Government, or if the training is tailored to meet the needs of the Federal Government.

In these instances, the Government Purchase Card may be used as a Method of Payment in conjunction with a contracting vehicle.

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A presentation slide titled "Additional Considerations" with a "Purchase Card" label in the top right corner. It features a logo on the left and a bulleted list of three items. The list items are: 1. The current MPT and Miscellaneous Payments up to \$25,000 are established thresholds. 2. Cannot intentionally split requirements to circumvent the MPT or other single purchase limits - NAVSUPINST 4200.99C, Chap 4, Para 3.a.(4). 3. DODI 1400.25-V410 defines a TE&PD event as an organization's total TE&PD requirement for a single specific or recurring TE&PD service.

 **Additional Considerations** Purchase Card

➤ **Don't Circumvent the Thresholds**

- ❑ The current MPT and Miscellaneous Payments up to \$25,000 are established thresholds
- ❑ Cannot intentionally split requirements to circumvent the MPT or other single purchase limits - NAVSUPINST 4200.99C, Chap 4, Para 3.a.(4)
- ❑ DODI 1400.25-V410 defines a TE&PD event as an organization's total TE&PD requirement for a single specific or recurring TE&PD service

Before reviewing the material presented thus far; here are some additional considerations when using the GPC to obtain TE&PD services.


Both the current Micro-Purchase Threshold as well as the FMR Miscellaneous Payment authority up to \$25,000 is established thresholds.

A split purchase occurs when a Cardholder splits a known requirement at the time of the purchase into several transactions so they can circumvent their authorized dollar thresholds in order to use the Purchase Card or to avoid sending the requirement to Contracting.

DOD Instruction defines a TE&PD event for the purpose of determining if the requirement can be obtained within the threshold.

Let's take a look at an example of a Training Education & Professional Development event.

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Additional Considerations

Purchase Card

For Example:

An organization plans to send 10 people per month for 12 months to a course that is available to the general public and priced the same for everyone in the same category. The price is \$1,000 per student and the total price of the TE&PD event is \$120,000.

For Example:

An organization plans to send 10 people per month for 12 months to a course that is available to the general public and priced the same for everyone in the same category. The price is \$1,000 per student and the total price of the TE&PD event is \$120,000.


So what is the requirement?

Is it multiple \$1,000 requirements for each individual?

Is it one requirement for \$12,000 for one month or is it the total of all requirements?

Does it matter if these are all different employees attending the training or if it is different lines of accounting?

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Additional Considerations

Purchase Card

Example:

An organization plans to send 10 people per month for 12 months to a course that is available to the general public and priced the same for everyone in the same category. The price is \$1,000 per student and the total price of the TE&PD event is \$120,000.

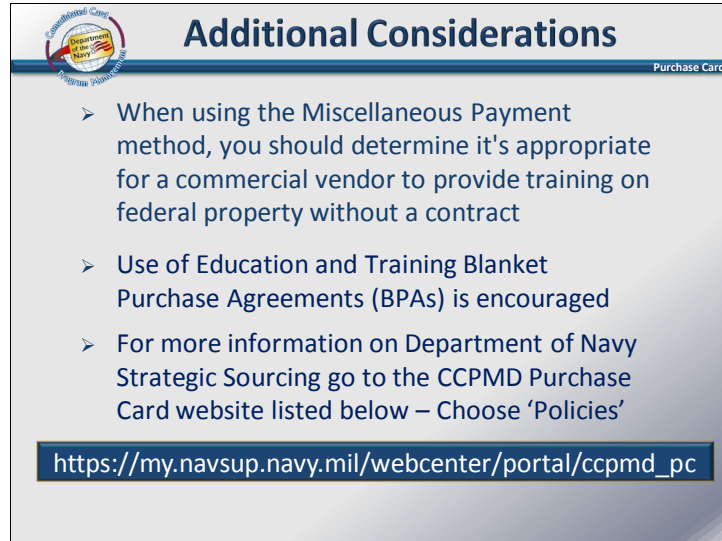
Solution:

An educational service agreement or other similar contracting vehicle must be awarded by a Contracting Officer to facilitate the ordering agreement.

Remember, \$25,000 is an established threshold for the Cardholder and by definition; the TE&PD event is the total for a single specific or recurring TE&PD service.

The solution here is this recurring TE&PD event is \$120,000 and must go to Contracting.

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The slide features a header with the DON logo on the left and the title 'Additional Considerations' in bold. Below the title, there are three bullet points. At the bottom, a dark blue box contains a URL. The text 'Purchase Card' is visible in the top right corner of the slide frame.

- When using the Miscellaneous Payment method, you should determine it's appropriate for a commercial vendor to provide training on federal property without a contract
- Use of Education and Training Blanket Purchase Agreements (BPAs) is encouraged
- For more information on Department of Navy Strategic Sourcing go to the CCPMD Purchase Card website listed below – Choose 'Policies'


https://my.navsup.navy.mil/webcenter/portal/ccpmd_pc

Also, if the TE&PD event is obtained as a Miscellaneous Payment and is being held on federal property, contact your local legal office to verify it's appropriate to allow a commercial vendor to provide their service on federal property without a contract.

There may be liability issues associated with the training or terms and conditions associated with a vendor using Government facilities or equipment. For example, a commercial vendor might be subject to liability issues while providing “hands-on” fork lift training while on federal property.

Finally, DON has established BPAs for Education and Training. Use of these BPAs is highly encouraged when the GPC is used as a Method of Payment. More information on BPA's can be found on the CCPMD website under Policies.

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Payment Type Review

Purchase Card

We discussed the FMR Miscellaneous Payment method and the FAR-based method for Micro-Purchases or Method of Payment to obtain training. Here is a chart of these three methods.

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔	→		FMR-based
Method of Payment	↔		→	FAR-based

Let's take a minute to review; we discussed the FMR Miscellaneous Payment method and the FAR-based method for Micro-Purchases for Method of Payment.

Here is a visual chart of these three methods to obtain training.

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Payment Type Review				
FMR Miscellaneous Payment				
	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
→ Miscellaneous Payment	↔			FMR-based
Method of Payment	↔			FAR-based

On the second row you will see that the FMR Miscellaneous Payment can be used up to \$25,000.


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Payment Type Review				
FAR-based Options				
	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔			FMR-based
Method of Payment	↔			FAR-based

The first and third rows depict the FAR-based options which include Micro-Purchase Threshold or Method of Payment against an established contract.

Each of these procurement methods has different dollar thresholds.

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Payment Type Summary				
 Purchase Card				
<ul style="list-style-type: none">➤ Micro-Purchase➤ Miscellaneous Payment if unique conditions are met➤ Method of Payment on established contract				
	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔	→		FMR-based
Method of Payment	↔		→	FAR-based


The notes shown here above the chart clearly outline that Miscellaneous Payments for training have unique conditions for use.


If the conditions are not met then you can proceed to use the Purchase Card with one of these FAR-based procedures.

If the requirement is above the Micro-Purchase Threshold (MPT) and does not meet the unique conditions or is above \$25K, then the requirement must go to Contracting.

The Government Purchase Card can also be used as a Method of Payment on an established contract.

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 **Practical Application** Purchase Card




	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔	↔		FMR-based
Method of Payment	↔		↔	FAR-based

So what is the best way to apply this training?

We are going to present five examples to illustrate when to use FAR versus FMR based training.

After each example, look at the chart to decide which process you should use.

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Example #1

Purchase Card

Requirement costing \$11,000 for a vendor to provide CPR training to be held on base. The training is available via the provider's online course catalog.

Which process should you use?

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔	↔		FMR-based
Method of Payment	↔		↔	FAR-based

Example #1


As a Cardholder, you receive a requirement for a vendor to provide CPR training to be held on base.

The total cost for the training event is \$11,000. The training vendor offers this training event in their on-line course catalog.

This sounds like a legitimate requirement and the question is which process should the Cardholder use?

Select the row that you believe applies to this situation.

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Solution #1

Purchase Card

Use FMR-based Miscellaneous Payment

- Available to the general public
- Cost is less than \$25K
- Complete price comparison
- Consult Legal Office

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
 Miscellaneous Payment	↔	↔		FMR-based
Method of Payment	↔		↔	FAR-based

If you chose Miscellaneous Payment, you are correct.

This TE&PD event is a regularly scheduled, off-the-shelf training available to the general public, and priced the same for everyone in the same category.

This includes a commercially available TE&PD event requiring no modification whether such training occurs on or off federal property or whether it includes non-federal employees.


The assumption is the Cardholder has proper delegated authority and is trained to make miscellaneous payments.

Also, since this purchase exceeds the Micro-Purchase Threshold, but does not exceed \$25,000, a price comparison must be completed to determine price reasonableness, and source selection must be justified and documented.

Finally, you may wish to consult with your local legal office to ensure that it's appropriate for a commercial vendor to provide training on federal property without a contract, and if there are any terms and conditions that may financially bind the Government.

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Example #2

Purchase Card

An approved SF 182 and a GPC request for an employee to attend a graduate school course costing \$6,000. This cost excludes the employee's travel and per diem.

Which process should you use?

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔	→		FMR-based
Method of Payment	↔		→	FAR-based

Example #2 is a little more straight forward.


An approved SF 182 and a GPC request to send one employee to a graduate school course costing \$6,000. This cost excludes the employee's travel and per diem.

We can see that the training event exceeds the Micro-Purchase Threshold so we know this option cannot be used.

We can also see that the cost excludes the travel and per diem of the employee attending the course.

Select the correct means to pay for the graduate course.

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Solution #2

Purchase Card

Making an FMR Miscellaneous Payment is correct!

We are sending the employee to the training at an established course

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
 Miscellaneous Payment	↔			FMR-based
Method of Payment	↔		↔	FAR-based

Yes, making an FMR Miscellaneous Payment is correct!

In this scenario we are sending the employee to training at an established course. You can use the Government Purchase Card to pay for the Training, Education and Professional Development up to \$25,000.


The employee will use their Government Travel Charge Card for their travel and per diem expenses.

One item to remember is that the FMR preference for Miscellaneous Payments is to pay the non-Government source directly before making a reimbursement to the employee.

And again, the assumption is the Cardholder has proper delegated authority and is trained to make miscellaneous payments.

Also, since this purchase exceeds the Micro-Purchase Threshold, but does not exceed \$25,000, a price comparison must be completed to determine price reasonableness, and source selection must be justified and documented.

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Example #3

Purchase Card

You receive a request for three employees to each take a \$2,500 on-line course on MS Excel. The employees will take the training at their work stations on base during work duty hours.

Which procurement vehicle?


	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔	↔		FMR-based
Method of Payment	↔	↔	↔	FAR-based

Example #3 represents a very common requirement.

Three students are to be trained at \$2,500 each for an on-line course on MS Excel. The students will take the training at their work stations on base during work duty hours.


Which procurement vehicle should be used?

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 **Solution #3** Purchase Card

**Again, the correct choice is
Miscellaneous Payment**

This requirement meets all the
conditions of the FMR

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
 Miscellaneous Payment	↔	↔	↔	FMR-based
Method of Payment	↔		↔	FAR-based

Yes, Miscellaneous Payment is the correct choice. This requirement meets all the conditions of the FMR.


MS Excel courses are certainly commercially off-the-shelf available training and online courses are available to the general public.

Both Government employees and the general public can access this same training event.

The assumption is the Cardholder has proper delegated authority and is trained to make miscellaneous payments.

Also, since this is considered a single training event/requirement totaling \$7,500 and exceeds the Micro-Purchase Threshold, but does not exceed \$25,000, a price comparison sheet must be completed to determine price reasonableness, and source selection must be justified and documented.

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Example #4

Purchase Card

You have a single Training Requirement for two military and three DOD civilian employees to attend a “Combating Violence in the Workplace” seminar. The total cost is \$11,500 which includes a discount for military attendees.

Which procurement vehicle should be used?

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔	↔		FMR-based
Method of Payment	↔	↔	↔	FAR-based


This is **Example #4**.

You have a single Training Requirement for two military and three DOD civilian employees to attend a “Combating violence in the workplace” seminar.

The total cost is \$11,500 which includes a discount for military attendees.


Which procurement vehicle should be used?

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 **Solution #4** Purchase Card

Method of Payment is the procurement vehicle you should use

Training is priced differently and is above the MPT

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔	→		FMR-based
 Method of Payment	↔		→	FAR-based


Yes, Method of Payment is the correct answer.

Like everything else in procurement, definitions of terms and specific procedures are key in utilizing all forms of procurement.

A discount for military attendees, although from an initial glance is good stewardship of tax dollars, does not meet the FMR requirement that the training must be priced the same for everyone.

Because the requirement does not meet the FMR conditions and is above the Micro-Purchase Threshold, the Purchase Card can only be used as a Method of Payment.

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Example #5

Purchase Card

The Government has a requirement for 20 employees to attend FERS/CSRS retirement training at a cost of \$4,200 to be provided by a commercial vendor on base.

Which procurement vehicle should be used?

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
Miscellaneous Payment	↔	→		FMR-based
Method of Payment	↔		→	FAR-based


Example #5 is our final scenario.

The Government has a requirement for 20 employees to attend FERS (Federal Employees Retirement System) /CSRS (Civil Service Retirement System) retirement training to be provided by a commercial vendor on base.

This is an existing, already developed course, advertised in the vendor's course catalog.

Which vehicle should be used?


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Solution #5

Purchase Card

Use FMR-based Miscellaneous Payment
This TE&PD event is an off-the-shelf service, requiring no modification, and the cost is less than \$25,000

	MPT	\$25K	Contract Limits	
Micro Purchase	↔			FAR-based
 Miscellaneous Payment	↔			FMR-based
Method of Payment	↔		→	FAR-based

Miscellaneous Payment is the correct answer.

This TE&PD event is a regularly scheduled, off-the-shelf training available to all and priced the same for everyone in the same category.

This includes a commercially available TE&PD event requiring no modification whether such training occurs on or off federal property or whether it includes non-federal employees.

The assumption is the Cardholder has proper delegated authority and is trained to make miscellaneous payments.

Also, you may wish to consult with your local legal office to ensure that it's appropriate for a commercial vendor to provide training on federal property without a contract, and if there are any terms and conditions that may financially bind the Government.

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As we have seen, the correct use of the Government Purchase Card to obtain training services is predicated on the conditions of the training event.

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The first method to use the FMR-based Miscellaneous Payment procedures assuming that all special conditions we previously discussed are met.

These conditions include that the Training, Education and Professional Development cost does not exceed \$25,000, and the TE&PD event is a regularly scheduled, off-the-shelf training available to the general public and priced the same for everyone in the same category.

Don't forget that for TE&PD events exceeding the Micro-Purchase Threshold but not exceeding \$25,000 (excluding travel and per diem of student), a price comparison is completed to determine price reasonableness, and source selection has been justified and documented.

This Knowledge Nugget also satisfies the DOD Instruction requirement for the Cardholder to be trained to make a Miscellaneous Payment for TE&PD services.

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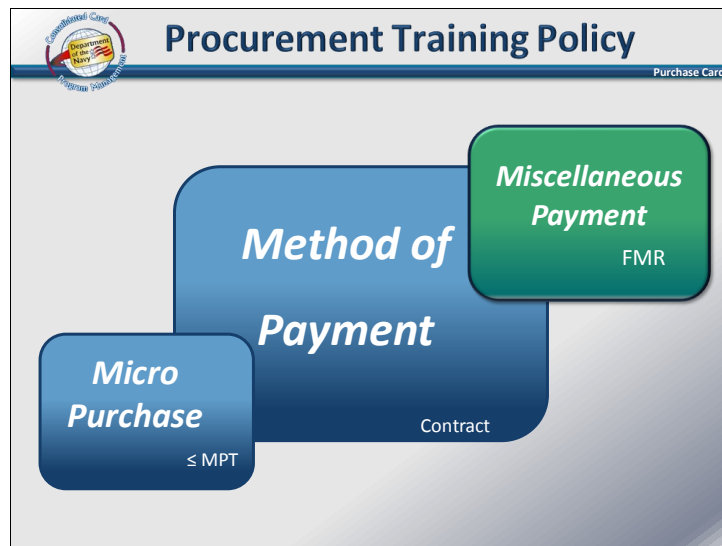


The second method is to use the FAR-based process which consists of Micro-Purchase procedures and Method Payment on an established contract.

Remember that when making a Micro-Purchase of TE&PD services from non-Government sources, the Micro-Purchase Threshold applies as well as all Proper Purchase rules outlined in both the FAR and the NAVSUPINST 4200.99 series.

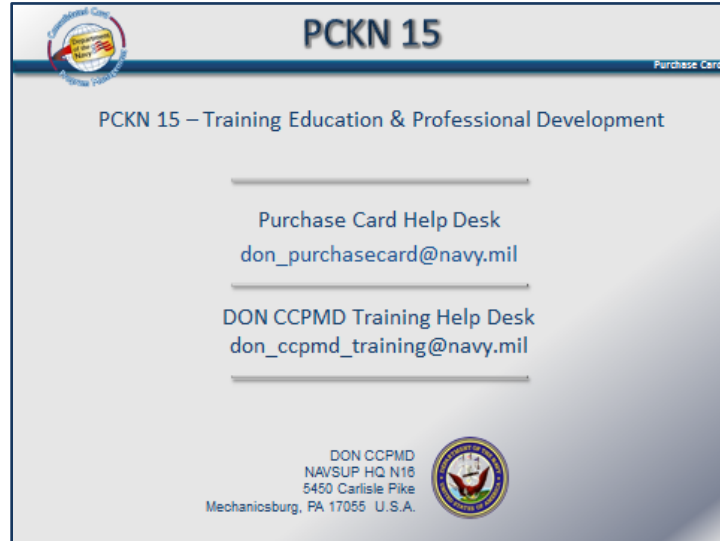
This also means you must adhere to Micro-Purchase Thresholds or the limits specified in your Letter of Delegation and that you cannot sign Terms and Conditions if you do not have the proper authority.

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If the requirement is above the MPT, forward the requirement to a warranted Contracting officer in order to use the Government Purchase Card as a Method of Payment in conjunction with a contracting vehicle.

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This concludes our training on the Use of the Purchase Card for Training, Education and Professional Development.

Use the email addresses above to contact the Purchase Card team or the CCPMD Training Help Desk with any question or comments.

To register your course completion and get your certificate, copy and paste this link into your browser and follow the instructions.

[https://my.navsup.navy.mil/apps/ops\\$training.CCPMD itf new?p course id=222](https://my.navsup.navy.mil/apps/ops$training.CCPMD%20itf%20new?p_course_id=222)