8-6. Training Purchase Examples

The following examples demonstrate how to apply the above guidance in purchasing situations:

a.

Situation 1

. Five individuals each have an approved SF 182 authorizing them to attend

in-person

leadership training. The cost of the training is $

6

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00 per student (seat). The training will take place

off

the installation. The details of the training session, including date and location, are advertised on the vendor’s website.

Resolution

. The CH may use the GPC because he/she is paying for individual slots in an existing COTS course. Even though the total price is $

30

,000, the CH may use the GPC because each student’s slot is within the $25,000 SF 182 payment limit. The training institution should invoice $

6

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0

00 for each approved student.

b.

Situation 2

. Three individuals each have an approved SF 182 authorizing them to attend conflict resolution training. The cost of the training is $2,000 per student (seat). The training is to be held virtually and is open to the public. The date of the class is advertised on the vendor’s website.

Resolution

. The CH may use the GPC because he/she is paying for individual slots in an existing COTS course. The cost per slot is within the $25,000 SF 182 payment limit. The training institution may either invoice per student (three $2,000 transactions) or per total cost (one $6,000 transaction).

c.

Situation 3

. The

requiring

activity is requesting a COTS training course for 15 students for a total cost of $

8

,000. The course description is listed on the vendor’s website

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he

activity

is asking the vendor to teach the course on the installation at a particular date and time.

Resolution.

The CH may use the GPC because the total

purchase

cost is within the applicable services MPT. The activity is purchasing an entire COTS course (group training), which is considered a service and a FAR-based action. Because

training

is considered a professional service, the applicable purchase limit is $10,000. Cardholders authorized to make micro-purchases can make the purchase if the vendor does not require agreement to terms and conditions other than price and delivery.

Alternately

, if the course is available on an existing contract or BPA, a CH with Contract Ordering Official authority could make the purchase.

d.

Situation 4

. The

requiring

activity is seeking to procure a virtual COTS retirement training course for up to 30 individuals. The estimated total cost of the retirement training is $

12

,000.

Resolution.

The CH cannot purchase with the GPC because

the total cost

exceeds the applicable services MPT. The activity is purchasing an entire COTS course (group training), which is considered a service and a FAR-based action.

Because training is considered a professional service, the applicable purchase limit is $10,000.

The CH should direct the request to the contracting office for action.

Alternately

, if the course is available on an existing contract or BPA, a CH with Contract Ordering Official authority could make the purchase.

e.

Situation 5

. The

requiring

activity is seeking a vendor to provide specialized training on an Army vehicle. The government has outlined the course requirements in a statement of work, and the vendor is creating a new course

according to the government’s request.

Resolution

. The CH cannot purchase with the GPC because the course is considered tailored training. The CH must send the request to the contracting office for action. If desired, the GPC may be used as the method of payment on the awarded contract.

Parent topic: CHAPTER 8 - EDUCATION, TRAINING AND TUITION ASSISTANCE