

# INDIAN AFFAIRS MANUAL

Part 22

Acquisition Management

Chapter 4

Procurement of Training from Commercial Vendors

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**1.1 Purpose.** This chapter establishes the policy and procedures for the procurement of training from commercial vendors. This includes but is not limited to traveling expenses related to sending an employee to a training course, traveling expenses related to bringing instructors to deliver a training course, and purchasing propriety materials for instructional purposes (i.e., textbooks, manuals, etc.). This policy **does not** include purchases for coaching, facilitation, and training from government agencies, including the Department of the Interior (DOI).

This chapter also provides the requirements for Indian Affairs (IA) personnel to be designated as a Senior Training Ordering Official and Training Ordering Official to purchase training from commercial vendors for employees within IA.

**1.2 Scope.** This policy applies all IA headquarters, field, and program staff under the authority of the Assistant Secretary – Indian Affairs (AS-IA), including the programs and offices under the AS-IA, the Bureau of Indian Affairs (BIA), Bureau of Indian Education (BIE), and Bureau of Trust Funds Administration (BTFA).

**1.3 Policy.** It is IA's policy that all training purchases are subject to the Buy Indian Act. Any deviations from the Buy Indian Act must be processed in accordance with the procedures in 22 IAM 8. Only Contracting Officers and individuals who are specifically appointed as Training Ordering Officials and Senior Training Ordering Officials are authorized to purchase training using the procedures described in this chapter.

**1.4 Authority.**

## **A. Statutes and Regulations.**

- 1) 5 CFR 410, Training
- 2) Federal Acquisition Regulation (FAR) 2.101, Definitions
- 3) FAR 4.601, Contract Reporting Definitions
- 4) FAR 4.606, Reporting Data
- 5) FAR 13.104, Promoting Competition

## **B. Guidance.**

- 1) DOI-AAAP-0052, Purchase of Training at DOI
- 2) DOI-AAP-0156 v2, Purchase Card Program Policy

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3) 22 IAM 8, Buy Indian Act Compliance

4) 27 IAM 16, Miscellaneous Obligations

## 1.5 Responsibilities.

- A. **Head of the Contracting Activity (HCA)** is responsible for appointing Training Ordering Officials and Senior Training Ordering Officials, and designating the IA Bureau Coordinator.
- B. **Bureau Coordinator** is the Bureau Acquisition Career Coordinator, and is responsible for administering the Training Ordering Official and Senior Training Ordering Official program within IA.
- C. **Training Director** is responsible for recommending final approval or disapproval of the Training Ordering Official or Senior Training Ordering Official application(s), and is IA's representative on the Interior Training Director Council.
- D. **Contracting Officer (CO)** is responsible for entering into, administering, and/or terminating contracts and making related determinations and findings. The CO is authorized to purchase training above \$50,000.
- E. **Senior Training Ordering Official** is appointed by the HCA, and has the authority to purchase training up to \$50,000.
- F. **Training Ordering Official** is appointed by the HCA to purchase training up to \$25,000.
- G. **Government Purchase Cardholder** is an IA employee authorized to use the Government Purchase card to make purchases (including training) up to the Micro-Purchase Threshold.
- H. **Supervisors** are responsible for approving Training Ordering Official and Senior Training Ordering Official appointment requests submitted by employees for whom they supervise.
- I. **Certifying Funds Official** is the individual in the respective program office who has the authority to certify that funds are available for a miscellaneous obligation (MO), and ensures the MO for training complies with the requirements of this chapter.

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## 1.6 Standards, Requirements, and Procedures.

### A. Standards for Appointment of Training Ordering Officials and Senior Training Ordering Officials

- 1) Training Ordering Officials and Senior Training Ordering Officials must be nominated by their supervisor.
- 2) Training Ordering Officials and Senior Training Ordering Officials must meet the training qualifications in DOI-AAAP-0052 before applying for appointment.
- 3) After meeting training qualifications, Training Ordering Officials and Senior Training Ordering Officials must be recommended by the Training Director, then will apply to and be appointed by the HCA using the application form(s) and procedures in DOI-AAAP-0052. Certification as a Training Ordering Official or Senior Training Ordering Official appointments must be renewed every three years.

### B. Procedures to Authorize Training Requests

- 1) All employee requests, or recommendations 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 type of training and cost (e.g., email, SF-182, or DOI Talent) as described in section 1.6 (C)(1) of this policy.
- 2) The person authorizing the purchase of training (e.g., Training Ordering Officials) cannot be the same person processing the obligation in the Financial and Business Management System (FBMS).
- 3) Prior to authorizing the purchase of training, any terms and conditions the vendor requests the Government accept must be reviewed. If the vendor has terms and conditions that are not consistent with standard Government terms and conditions, the purchase cardholder, Training Ordering Official, or Senior Training Ordering Official, must consult with a Contracting Officer or the Solicitor's Office prior to authorizing the purchase.

### C. Procedures to Purchase Training

- 1) Purchasing individual and group training is separate from authorizing training although in some cases, the purchase may involve using 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

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be calculated (e.g. in the case of group training) should be resolved in consultation with a Contracting Officer.

All training in IA will be purchased using the mechanism, process, and procedures summarized in the table below:

<b>Amount of Training Transaction</b>	<b>Who has the authority to procure training?</b>	<b>What is the appropriate method of purchase?</b>	<b>What is the required purchase approval documentation?</b>
All training at or below the micro-purchase threshold	Purchase cardholder*	Purchase card is preferred method of purchase*	Approved charge card statement with supporting documentation in accordance with DOI-AAAP-0156; or  If completed as miscellaneous obligation, SF-182 approved by Training Ordering Official or individual with higher level procurement authority.
Training up to and including \$25,000	Training Ordering Official*	Miscellaneous Obligation*	SF-182 approved by Training Ordering Official or individual with higher level procurement authority
Training up to and including \$50,000	Senior Training Ordering Official*	Miscellaneous Obligation*	SF-182 approved by Senior Training Ordering Official or Contracting Officer and Record of Training Purchase.
All training above \$50,000	Contracting Officer	Purchase Order in FBMS	The appropriate Standard Form under the FAR.

\*If an individual with a higher-level procurement authority purchases the training, another appropriate process (i.e. miscellaneous obligation or contract action) may be used in accordance with DOI-AAAP-0052.

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- 2) If a miscellaneous obligation is used as the purchase method, the Certifying Funds Official must ensure the training request and documentation complies with the requirements of this chapter before processing payment.

### D. Limitations.

Training Ordering Officials and Senior Training Ordering Officials are **not authorized** to purchase training under any of these situations:

- 1) Training is not commercially available at a firm-fixed price.
- 2) Any situation that involves negotiating the price of the training, except when accepting a discount from established prices.
- 3) Any contract for developing or creating training materials or courses unless procured through DOI University.
- 4) Any modification or tailoring of commercially available training if the changes increase the price of the training.

### Approval

**JASON FREIHAGE**

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