

8-4. Purchase Training Examples

a. In accordance with current acquisition and financial management policy, the SF 182 authority is authorized for use only under the following conditions:

- 1) SF 182s are granted to individual employees; and
- 2) The individual employees will attend a regularly scheduled, off-the-shelf course that is available to the public and priced the same for everyone in the same category (e.g., price per student) and requires no tailoring; and
- 3) The GPC is being used to pay the training provider directly instead of reimbursing the employee.

b. If a course is being purchased (e.g., group training), the SF 182 authority does not apply and should not be used. The purchase is a FAR-based acquisition that generally needs to be sent to the supporting contracting office for action. Exceptions that allow action by a CH include the following:

- 1) The course is priced below the applicable MPT and does not require the CH to agree to terms and conditions other than price and delivery. The purchase can be made following micro-purchase procedures; or
- 2) The course is available under indefinite delivery contracts not requiring the GPC Ordering Official CH to agree to terms and conditions other than price and delivery.

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

1) **Situation 1.** Five individuals each have an approved SF 182 authorizing them to attend leadership training. The cost of the training is \$5,800 per student (seat). *The training will take place off the installation.* The training is for attendance at a regularly scheduled, off-the-shelf course that is available to the public and priced the same for everyone in the same category (e.g., price per student) and requires no tailoring.

Resolution: The training institution should invoice \$5,800 for each approved student. In accordance with DoD FMR Volume 10, Chapter 12, Section 120323, "to minimize the need for reimbursing the employee, the preference is to pay the training provider directly." Even though the total price the Government would otherwise be obligated to pay to reimburse all attendees directly is \$29,000, the CH may use their GPC for each of these payments because none individually exceeds the \$25,000 SF 182 payment threshold. When the Government has recurring requirements for the same course the contracting office should be consulted to determine if a contract-based solution should be used to ensure the Government receives the best pricing. GPC SF 182 training payment authority may only be used to pay vendors directly for training approved on an SF 182 that would otherwise be directly reimbursed to an individual; the price of any one SF 182-based GPC transaction may not exceed \$25,000.

2) **Situation 2.** The requiring activity has a requirement to provide a retirement training course; up to 30 individuals can attend. *The training will take place off the installation.* The estimated cost for the retirement training is \$11,000 for the course.

Resolution: The activity is purchasing a course (group training), which is considered a service and a FAR-based action. Taking the training off the installation is not a relevant factor for considering if the GPC can be used in this situation. This service is professional, and subject to the applicable

services MPT of \$10,000. Since the total price is above the MPT, the request must be submitted to the contracting office for action.

3) **Situation 3.** The requiring activity is requesting a (regularly scheduled, COTS, priced the same for everyone, no tailoring) existing leadership training course for 15 students for a total cost of \$6,000. *The training will take place at the installation.*

Resolution: The activity is purchasing a course (group training), which is considered a service and a FAR-based action. The SF 182 is not applicable for this situation and cannot be used for this purchase requirement. This service is professional; therefore, the purchase is subject to the applicable services MPT of \$10,000. A CH authorized to make micro-purchases on the open market can make the purchase as long as it does not require agreement to terms and conditions other than price and delivery. Open market micro-purchases are limited to the MPT (\$10,000 or when in direct support of an Emergency-type Operation, one of the higher MPTs could apply). Alternatively, if a fixed-price indefinite delivery contract does not require the CH to agree to any terms and conditions, a CH with Ordering Official authority could make the purchase.

4) **Situation 4.** The requiring activity is requesting specialized forklift training at a Government facility. A forklift operator from a local sales and repair shop will be conducting the class. The quote includes a SOW and an outline of agency-specific topics to cover. The estimated cost of the training is \$5,000.

Resolution: The GPC cannot be used. The vendor is offering tailored training, which is considered a service and a FAR-based action. The applicable services MPT is \$2,500, because the instructor is an OSHA-certified forklift operator. This occupation falls under the services subject to 41 USC Chapter 67, Service Contract Labor Standards. The request should be directed to the contracting office.

5) **Situation 5.** Three individuals each have an approved SF 182 authorizing them to attend leadership training. The cost of the training is \$2,000 per student (seat). *The training is to be held virtually.* The training is for attendance at a regularly scheduled, off-the-shelf course that is available to the public and priced the same for everyone in the same category (e.g., price per student) and requires no tailoring.

Resolution: The training institution should invoice \$2,000 for each approved student. In accordance with DoD FMR Volume 10, Chapter 12, Section 120323, "to minimize the need for reimbursing the employee, the preference is to pay the training provider directly." The CH may use their training GPC for each of these payments because none individually exceeds the \$25,000 SF 182 payment threshold. When the Government has recurring requirements for the same course the contracting office should be consulted to determine if a contract-based solution should be used to ensure the Government receives the best pricing.

Parent topic: [Chapter 8 - Education, Training and Tuition Assistance](#)