8-1. SF 182 Training Payments (Non-FAR based training actions)

- a. **References**. 5 USC 4109 gives the head of an agency the authority to pay for training and makes Training, Education and Professional Development (TE&PD) services a valid expense of the U.S. Government. DoD 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. DoDI 1400.25, Volume 410 provides policy and conditions to make a Miscellaneous Payment for TE&PD services directly to a non-Government source. This same instruction requires specific conditions to be met in order to use the GPC. FAR 13 provides authority for Simplified Acquisition and micropurchase of services. DoD policy is to use the GPC to make FMR-based Miscellaneous Payments for TE&PD 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. 5 USC 4109 authorizes the head of an agency, under the regulations prescribed in 5 USC 4118(a)(8), to reimburse employees for necessary training expenses (e.g., tuition and matriculation fees; library and laboratory services; purchase or rental of books, materials, and supplies; and other services or facilities directly related to employee training). See DoDI 1400.25 Volume 410 for additional information regarding the appropriate use.
- b. **SF 182**. The SF 182 (Authorization, Agreement, and Certification of Training) is the authorized and required training obligating document. GPC payments for commercial-off-the-shelf (COTS) training must be accompanied by an SF 182 or approved equivalent. Authorized training may be provided by Government or non-Government sources. Each student attending training must complete an SF 182. A single SF 182 must not be used for a group of individuals to attend training. CHs must include the signed SF 182 or equivalent and a copy of the training certificate or proof of completion in their file documentation. See Army Publications for the current version of the SF 182.
- c. The GPC will be the method of payment for all commercial training requirements using the SF 182, valued at or below \$25,000, in lieu of an employee reimbursement by miscellaneous payments in accordance with the DoD FMR Volume 10, Chapter 12, Section 3.23, and DoDI 1400.25, Volume 410. The SF 182 is not a FAR-based transaction. As such, the MPT for services does not apply to these types of transactions. DoD has made a determination and uses the GPC to purchase training authorized by use of a single SF 182 to a cap of \$25,000 per transaction.
- d. The GPC will be used by CHs (primarily TE&PD Educational Office personnel) to pay for COTS training and education up to a single purchase limit of \$25,000. See AFARS 5113.270-90(g).

Individual Slots in Existing Training Course. Each slot purchased may be considered its own transaction, even when paid together. Each student must have an approved SF 182. Each slot must be below \$25,000 per student. CHs may purchase each slot as a separate transaction or may combine the slots into a single transaction for the total amount. To be considered COTS, training from non-Government sources must meet the following criteria:

- 1) **Regularly scheduled.** The TE&PD event can be found in an established offering, whether in print or online. 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 online course.
- 2) **Off-the-shelf TE&PD service available to the general public.** The service is 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.

3) **Priced the same for everyone in the same category.** The service 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.

Parent topic: Chapter 8 - Education, Training and Tuition Assistance