

## 8-3. FAR-based Training Actions

FAR-based training actions are subject to the applicable services MPT. They are not considered SF 182 payments, and the \$25,000 limit does not apply. The following paragraphs identify the types of training requests that are considered FAR-based actions:

a. **Buying an Existing (Not Tailored) Imported Course.** In this case, the purchase is for the entire COTS course, and the MPT applies to the dollar value of the all-inclusive total cost of the course (instructor time, materials, etc.). Depending on the subject matter of the training, these courses may be considered “professional services.” No SF 182 is needed for individuals.

1) **Example #1.** You are buying a 1-day Myers-Briggs seminar for 35 employees at a total cost of \$9,500. The GPC can be used as a PROCUREMENT and PAYMENT mechanism because it falls within the \$10,000 MPT.

2) **Example #2.** You are buying a 3-day mid-career retirement course for 150 participants held at the agency’s headquarters. The cost of the course is \$30,000. Do not take the \$30,000 and divide by 150 participants to arrive at a price per student (\$200) and think you can simply pay for 150 separate slots and split those payments against your SPL. The MPT must be applied to the aggregate cost in this case, or \$30,000. In this case, the cost exceeds the MPT and the cardholder’s SPL and must be purchased via other formal means (i.e., Contracting Office / Contracting Officer). The GPC cannot be used for procuring the course but may be used as a PAYMENT mechanism within the SPL of the CH and agency policy.

b. **Subscriptions for Group Training Services.** Subscriptions for access to on-demand training are considered a supply. Cardholders can use the GPC to pay for subscriptions up to the supply MPT.

In this case, the purchase is a subscription for access to on-demand training, and the MPT applies to the dollar value of the total cost of the subscription. Subscription services for groups or organizations typically set a threshold or limit to the number of employees who can access training services via the subscription for the flat subscription cost; the costs are not pro-rated or adjusted by the number of actual employees that actually access the training.

1) **Example.** You are buying a subscription to a training vendor’s on-demand training site for a cost of \$9,000. Up to 300 employees can access on-demand training under the subscription and the cost is not pro-rated based on actual use. The purchase could be made with the purchase card because it falls within the \$10,000 MPT.

c. **Tailored Training.** The GPC cannot be used to purchase tailored training.

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