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8-3. Entire COTS Course (Group Training)

a.

Cardholders may use the GPC to purchase an entire COTS course. In this category, the CH is coordinating with the vendor to schedule and pay for a group training session. For example, the CH is scheduling and purchasing a leadership course for up to 30 students.

b.

Group training is a FAR-based transaction and service subject to the MPT (not subject to SCLS). See FAR Part 2.101, Definition of a Micro Purchase.

Requirements exceeding the MPT

must

be directed to the supporting contracting office for action.

c.

To purchase a group training session, CHs will have one of the below designations in their appointment letter, as applicable:

1) **Micro-Purchase Cardholder.** 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.

2) **Contract Ordering Official Cardholder.** The course is available under established contracts (e.g., FSS, indefinite-delivery contracts, BPAs) that do not require the CH to agree to terms and conditions other than price and delivery. Cardholders may order a training course up to their delegated limit for this authority (\$25K or \$250K maximum). See Table 1-3 and paragraph 1-8.e.

d.

File Documentation

. Cardholders will include the following documentation in their purchase file:

1) Army Purchase Request & Approval (PR&A) or equivalent.

2) Invoice and/or receipt.

3) 889 Representation.

4) Proof of class completion (e.g., training certificates, sign-in roster, Section V of PR&A, TED Credit

Card Purchase report).

e.

SF 182

. The purchase of an entire group session is subject to the MPT even if each student has an SF 182.

The fact that each student has an SF 182 does not mean the CH is paying for individual slots.

f.

The following examples illustrate the proper application of the MPT for group training. See 8-6 for additional examples.

1) **Example 1.** A CH is buying a Myers-Briggs seminar for 35 employees at a total cost of \$9,500. The GPC may be used as both the procurement and payment mechanism because total cost is below the MPT.

2) **Example 2.** An organization is requesting a 3-day retirement course for 150 participants held at the installation. The total cost is \$30,000. The organization cannot divide the total cost by 150 to arrive at a price per student (\$200) and pay for 150 separate slots. The MPT must be applied to the aggregate cost, i.e., \$30,000. Because the total cost exceeds the MPT, the GPC cannot be used as the purchasing method. The request must be procured by a contract action. If desired, GPC may be used as the payment mechanism on the contract.

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