

UNITED STATES OFFICE OF PERSONNEL MANAGEMENT



Customer Service Guide

**Center for Contracting, Facilities,
and Administrative Services**

A New Day for the Civil Service

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1.0 INTRODUCTION

The Office of Personnel Management (OPM), Management Services Division (MSD), Center for Contracting, Facilities, and Administrative Services (CCFAS), Contracting Group (CG) is located at 1900 E Street, NW, Room 1342, Washington, DC 20415. CCFAS/CG supports acquisition requirements over \$3,000 for OPM Headquarters Offices and all acquisition requirements over \$100,000 for all OPM Offices.

2.0 PURPOSE

This guide provides OPM customers with information to assist in the preparation and submission of a comprehensive and workable procurement package. It is intended for use as a handy reference for the preparation of procurement requests. If properly used, it will save both technical and contracting offices considerable time and administrative expense.

3.0 POINTS OF CONTACT

Ronald C. Flom, Senior Procurement Executive, OSDDBU and Competition Advocate	202-606-3207
Tina B. McGuire, Deputy Associate Director, CCFAS	202-606-2200
Vacant, Director, CCFAS/CG	202-606-4591
Chris L. Atkins, Supervisor, IT Team	202-606-8666
Antoinette M. Campbell, Supervisor, Services Team	202-606-4806
Joy Christie, Supervisor, Investigations Team	202-606-4215
George W. Leininger, Supervisor, Policy Team/Small Business Technical Advisor	202-606-1598
Cheryl D. Allen, Contracting Officer, ISP	202-606-2054
Vernon C. Cooper, Contracting Officer, CTS	202-606-4356
Dennis P. Harrison, Contracting Officer, GoLearn	202-606-4116
Lois A. Jones, Contracting Officer, EHRI	202-606-4629
William N. Patterson, Contracting Officer, RSM	202-606-1384
R. Alan Miller, Associate General Counsel	202-606-1700

4.0 CUSTOMER SERVICE STANDARDS

To ensure we meet your expectations, it is very important you include us in the beginning of the conceptual/action planning process, regardless of the dollar value of your requirement. Our goal is to be a business partner with you throughout the procurement process from the inception of your request until the contract is completed. We call this cradle to grave. You do not need to wait until you receive a hard copy of the funding document before you begin communicating with us. Call us and one of our Contract Specialists will contact you within three (3) business days. We can then provide recommendations/guidance on what might be the best approach, e.g. best value, oral presentations, source selection plan development, incentives, oversight, milestones, etc.

Our Contract Specialists will work closely with you to ensure we satisfy your requirements and meet the applicable timeframes set forth in our attached Procurement Administrative Lead Time (PALT) Guidelines ([see Attachment 1](#)). Our goal is to complete all requirements within the

timeframes set forth in our PALT guidelines. PALT does not begin until the CCFAS/CG receives a complete acquisition package.

NOTE: You should receive an e-mail notifying you of the Contract Specialist procuring the requested supply/service within **one (1) business day** after we accept your procurement package in CCFAS/CG. If you do not receive notification, please contact the Supervisor, IT Team or the Supervisor, Services Team.

4.1 Requirements up to \$3,000 (Micropurchases)

The Governmentwide commercial purchase card is the preferred method to purchase and pay for micro-purchases. Purchases at or below the micro-purchase threshold may be conducted using any of the methods described in Federal Acquisition Regulation (FAR) Subpart 13.3, provided the purchaser is authorized and trained, pursuant to OPM procedures described in the attached OPM Contracting Policy Number 13.301 – OPM Purchase Card Program ([see Attachment 2](#)), to use those methods.

4.2 Paperless Distribution of Awarded Purchase Orders, Contracts, Modifications, and their Contractual Documents

We prefer a paperless environment to electronically distribute all awarded purchase orders, contracts, modifications, and other contractual documents to the e-mail address(s) of your choice within **one (1) business day** after the Contracting Officer (CO) approves the document. To accomplish this, we require an e-mail address with your procurement package. We can provide a paper copy upon request.

NOTE: We will also provide scanned/signed awarded purchase orders, contract, modification, and other contractual documents to the contractors via e-mail.

5.0 CUSTOMER FEEDBACK

Following the completion of our contracting support, we will ask you to complete a Contracting Group Customer Satisfaction Survey ([see Attachment 3](#)) so we can get immediate feedback from you regarding the quality of services you received.

6.0 UNAUTHORIZED COMMITMENTS

An unauthorized commitment occurs when an OPM employee, other than a Contracting Officer, leads a vendor to conclude an order has been placed for supplies or services, and the vendor proceeds with the work and/or delivery/performance of the supplies or services. An unauthorized commitment also occurs when an existing contract obligation is exceeded. Unauthorized commitments require a “ratification.” A ratification is the act of approving an unauthorized commitment by an official who has the authority to do so. FAR 1.602-3 – Ratification of Unauthorized Commitments and OPM Contracting Policy Number 1.602-3 – Ratification of Unauthorized Commitments ([see Attachment 4](#)) provide guidance regarding the ratification of unauthorized commitments.

To request the ratification of an unauthorized commitment, the affected organizations must prepare a memorandum requesting ratification. The supervisor of the employee who made the unauthorized commitment must sign the memorandum. The memorandum must be submitted to the Director of the Contracting Group for disposition, and must include the items stated on page 4 of OPM Contracting Policy Number 1.602-3.

The Senior Procurement Executive (SPE) has the authority to ratify an unauthorized commitment. This authority is further delegated to the Director of the Contracting Group for unauthorized commitments of \$100,000 or less. For unauthorized commitments exceeding \$250,000, the SPE will coordinate the ratification with OPM's Office of General Counsel. As indicated in OPM Contracting Policy Number 1.602-3, ratification requests may be disapproved for several reasons as noted in the Policy.

7.0 FISCAL YEAR REQUISITION SUBMISSION DEADLINES

The SPE will issue cutoffs dates no later than the third quarter for receipt of procurement actions to ensure all current end-of-year funds are obligated and all of succeeding fiscal year contracts "subject to availability of funds," are awarded by the end of the current fiscal year. This notice is applicable to all activities that submit procurement actions to CCFAS/CG.

NOTE: We will make every effort to process all requirements, time permitting. We will process acquisition packages that you submit after normal cut-off dates based upon priority and end of fiscal year time constraints. You should make every effort to submit acquisition packages within the established cut-off dates in order to ensure timely processing of requirements and obligation of funding.

8.0 ACQUISITION PACKAGES

Please ensure acquisition packages are complete and clearly define your requirements. A complete/workable acquisition package allows us to provide immediate service to our customer and saves you from expending time and resources on costly re-work. You must prepare and receive approval for an acquisition package before the CO initiates a purchase action. You must submit all acquisition packages electronically via AcqTrack. We may return incomplete acquisition packages to the initiator (customer) for correction.

An acquisition package may consist of a Simplified Acquisition Request (SAR). See [Attachment 5](#) for the Simplified Acquisition Checklist. See [Attachment 6](#) for the SAR template. The SAR is used for contracting requirements between \$3,000 and \$100,000. You must describe the requirement and state other pertinent information regarding the requirement on the SAR.

See [Attachment 7](#) for an Acquisition Package Request Submission Checklist for requirements over \$100,000.

8.1 Capital Investment Committee

The purpose of the OPM Capital Investment Committee (CIC) is to ensure all key OPM investment decisions are cost-effective, consistent with the Agency's Strategic Plan, fully

justified and supported by appropriate analyses, and implemented as approved. The CIC establishes criteria to evaluate investment requests, conducts follow-up reviews, and determines whether investments are achieving their expected results. Members of the CIC include the following: Director, Deputy Director, Chief of Staff, Executive Director/Senior Counselor to the Director, Chief Financial Officer (Chair), and Associate Director, Management Services Division.

The CIC reviews all investments of \$250,000 or more, all high risk or high visibility investments of any value, and all rent requirements. The Program Office is responsible for obtaining CIC approval prior to the submission of Acquisition Plans for approval. See [Attachment 8a](#), [Attachment 8b](#) and [Attachment 8c](#) for CIC Guidelines for Investment Review, CIC Committee Review Form, and CIC Requirements for Investment Proposals.

8.2 Acquisition Plans

Requirements over \$100,000 require a formal acquisition plan in the format specified at FAR 6.303-2. See [Attachment 9a](#), [Attachment 9b](#) and [Attachment 9c](#) for the Acquisition Plan templates. For actions over \$250,000, the Acquisition Plan must state that an action was approved by the CIC and the approval date. Include this statement in the first paragraph of the cover memo. Acquisitions over \$250,000 must be approved by the Director or Deputy Director. Acquisitions over \$100,000 but under \$250,000 must be approved by the Senior Procurement Executive. Acquisition Plans over \$250,000 will be submitted electronically via the Document Management System (DMS) for approval.

8.3 Adequate Description of the Requirement

You must describe the supplies/services in a manner that will encourage maximum competition (this includes rental and maintenance of Information Technology (IT) equipment) and eliminate any restrictive features, which limit acceptable quotes to one contractor's product. Methods of describing requirements include:

a. Purchase Description.

A purchase description is the most common preferred method of describing simplified acquisition requirements. An adequate purchase description should set forth the essential physical and functional characteristics of the supplies/services required. It should not be unduly restrictive and must not specify a product peculiar to one manufacturer (e.g., by manufacturer brand name and part number (P/N only)) unless it is essential to the Government's requirement; and other similar products lack the particular feature necessary to meet the Government's minimum requirements. A purchase description should include the following characteristics, as necessary, to describe the Government's minimum requirement:

- (1) Common generic identification of the item
- (2) Kind of material
- (3) Electrical data, if any

- (4) Dimensions, size, or capacity, (minimums and maximums)
- (5) Principles of operation
- (6) Environmental conditions
- (7) Intended use and essential operating conditions
- (8) Equipment with which the item is to be used
- (9) End item application
- (10) Original Equipment Manufacturer's Part Number, if applicable, other pertinent information that further describes the item, material, or service required.

b. Brand Name or Equal.

Brand name or equal descriptions must also set forth those salient physical, functional, or other characteristics of the brand name product, which are essential to the Government's needs. The customer must provide these characteristics in the acquisition package. If such information is not included, we must return the acquisition package to the customer for more information/cancellation. Any contractor who submits a quotation on an "equal product" is required to clearly identify the item by brand name (e.g., catalog, description, etc.) which shows that the offered product meets the salient physical, functional, and essential characteristics required. This data is then furnished to the customer who must determine if the offered product is in fact equal to the brand name specified. If the product is not equal, the customer will submit a written determination explaining why the "or equal" product is not acceptable. If you must use a brand name or other manufacturer-specific item identifier, you must prepare a Justification for Other Than Full and Open Competition. See [Attachment 10](#) for OPM Contracting Policy Number 11.105 – Brand Name Item Descriptions for additional guidance on the special requirements associated with buying an item peculiar to just one manufacturer.

c. Statement of Objectives (SOO)/Performance Work Statement (PWS).

Properly describing what the customer needs is one of the greatest challenges for both the customer and CCFAS/CG. The SOO and PWS are probably the most critical elements of any contract since they form the basis for the price, delivery or performance, and quality of the contract product or outcome. Yet this is probably the area least understood by customers and the cause of the greatest misunderstanding between contracting personnel and their customers. If the requested requirement is for certain services, the acquisition should be a performance-based acquisition (PBA). FAR 2.101 defines PBA as "an acquisition structured around the results to be achieved as opposed to the manner by which the work is to be performed." Contact your Contracting Officer or Contract Specialist to determine if your acquisition for services should be performance-based. The acquisition package should include a detailed SOO or PWS, which should include a description of the work to be done and where and when it is to be done. The contractor will perform only work described in the SOO/PWS. The acquisition package should also include a Quality Assurance

Surveillance Plan (QASP) to establish measurable performance standards, assess contractor performance on the basis of these standards, describe how the agency will conduct quality, and incentivize contractor performance. See [Attachment 11](#) for OPM Contracting Policy Number 37.6 – Performance-Based Acquisition for OPM-specific guidance on using performance-based procedures in acquisitions.

8.4 Quantity and Unit of Issue

The CO will normally purchase the exact quantity stipulated on the acquisition package. However, when an upward adjustment in quantity is desirable in order to obtain the most economical buy, or where it is otherwise advantageous, the CO may make the adjustment if it does not exceed funding restrictions annotated on the face of the requisition or contact the acquisition package originator for authority to adjust the requested quantity.

8.5 Delivery Information

Required delivery information will include a required delivery date or period of performance, place of delivery, if partials will be accepted, and priority designator, if appropriate.

8.6 Unique Requirements

Include any unique requirements such as marking or packing as necessary.

8.7 Developing an Independent Government Estimate

- a. As our customer, you are responsible for providing an Independent Government Estimate (IGE) with submission of your acquisition package. The IGE is one basis for determining fair and reasonableness of prices offered by vendors. You must also establish the validity of your IGE.
 - (1) The complexity of the IGE depends upon the dollar value and type of contracting action requested.
 - (2) For supplies under the simplified acquisition threshold (\$100,000), the IGE is generally the unit price per item contained on the acquisition package. These estimated prices might be obtained from catalogs, price lists, brochures, or records of previous purchases. The current estimated price should be adjusted for differences in the items purchase (if similar but not identical), inflation, or quantities purchased. Catalogs, brochures, or price lists should be completely identified.
 - (3) Most service requirements will be negotiated and a narrative explaining the method and information used in preparing the estimate is required. The IGE should be provided in the same detail as though the government were going to compete for the contract. The IGE for all service requirements over

\$2,500 - \$100,000 should have a simple price breakdown. However, the larger service requirements (over \$100,000) will require a more formalized breakdown to include labor categories, labor burden, general and administrative (G&A), profit, materials, etc.

- (4) Each acquisition of supplies or services that has an anticipated dollar value exceeding \$3,000 and not exceeding \$100,000 are reserved exclusively for small business concerns and shall be set aside (some exceptions apply). Contact the CO for further guidance. Items to consider include:
 - (a) The biggest expense in service contracts is generally labor. The most important part of the IGE is a break down of labor by type and estimated hours.
 - (b) Indirect labor costs include FICA (Social Security) at 7.65 percent, federal and state unemployment insurance, worker's compensation insurance, and any fringe benefits contained in Department of Labor wage determinations.
 - (c) Identify supplies and equipment by line item that a contractor would need to perform the contract.
 - (d) Identify other miscellaneous expenses that might be needed in order for a contractor to perform the contract (other direct costs, i.e., travel).
 - (e) State the amount included in the estimate for overhead and G&A expenses. How did you determine the amount used?
- (5) Always treat an IGE as procurement sensitive information, mark and guard it as:

Official Use Only – Procurement Sensitive.

8.8 Funding

Each acquisition package will contain adequate funding to support the requirement. This is usually shown by approved accounting and appropriation data and dollar amount. Generally, funds must be available at the time the contract action is started, but there are some exceptions (requests that are "Subject to the Availability of Funds" (SAF)).

The most common SAF exceptions are:

- a. For a contract action which starts the following fiscal year and for which action must be initiated prior to funds becoming available.
- b. Indefinite delivery/indefinite quantity and requirements type contracts where funds are cited on individual delivery orders.
- c. Funds must be cited in an amount estimated to be adequate for the purchase. This generally involves historical data on the cost or an informal market survey

by the customer. In more complex acquisitions, a detailed Independent Government Estimate (IGE) may be required of the customer. CCFAS/CG can assist the customer in estimating the cost of a purchase or in preparing an IGE.

8.9 Purchase Requests Containing Restrictions as to Availability of Cited Funds

If the acquisition package contains a cut off date for obligation of the cited funds, we will make every effort to schedule procurement actions to meet the established deadline. However, meeting the established deadline does not relieve the Contracting Office of compliance with established procurement policies including adequate competition and fair and reasonable pricing. We will report any known or anticipated delays, which may prevent the obligation of funds by the deadline date, in a timely manner to the customer. When the purchase price will exceed the monetary ceiling amount of the acquisition package, we will not initiate any obligation action unless additional funds are authorized and obtained. These funds may be authorized and obtained by any of the following methods:

- a. When a requisition is used, an increase or a de-obligation of unused funds must be via a memorandum for file. An increase may be requested and authorized by electronic mail.
- b. Authorization may be obtained by telephone, but **must** be confirmed in writing.

8.10 Government Commercial Purchase Card as Method of Payment

When the organizational governmentwide commercial purchase card will be used as the method of payment, you will list the customer's name and telephone number on the requisition.

8.11 Approvals and/or Signatures

Acquisition packages should include all necessary justifications and signatures approving the requirement. Other approvals that might be documented include items such as sole source justifications.

8.12 Inspection and Acceptance

Supplies obtained using simplified acquisition procedures are normally inspected and accepted at destination. The requiring activity should note any special inspection and acceptance procedures deemed necessary on the acquisition package.

8.13 Points of Contact

The requiring activity **must** list the points of contact's name, telephone number and e-mail address on the acquisition package in case additional information is required.

8.14 Options

The requiring activity should identify any known requirement that may be suitable for award as a basic contract with subsequent option years on the acquisition package. This allows the CO to include options in purchase orders or contracts when it is in the Government's best interest.

8.15 Purchase Authority

The customer must have more than just money in order to make a purchase. A customer must also have the authority for the supplies or services they want to acquire. To use an obvious example, even though a customer may have sufficient funds to purchase a car, very few customers will ever have the authority to purchase a car.

Customers generally know through experience whether or not they are authorized to purchase certain supplies or services and have internal procedures established for submitting requests for contracts. Generally, requests go through the channels appropriate to the supply or service. It is beyond the scope of this guide to attempt an exhaustive listing of the procedures and channels for all supplies and services that may be requested. The point is, do your homework as a customer. Ensure you have the authority and approval required and go through the appropriate channels to request a contract. If you have a question, contact the CO.

9.0 SMALL BUSINESS PROGRAM

It is the policy of the Government and OPM to provide maximum practicable opportunities in its acquisitions to small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns. Such concerns must also have the maximum practicable opportunity to participate as subcontractors in the contracts awarded by any executive agency, consistent with efficient contract performance.

The Small Business Administration (SBA) counsels and assists small business concerns and assists contracting personnel to ensure a fair proportion of contracts for supplies and services are placed with small business. The CCFAS/CG Policy Team is responsible for effectively implementing the small business programs, including achieving program goals. They are to ensure contracting and technical personnel maintain knowledge of small business program requirements and take all reasonable action to increase participation in their activities' contracting processes by these businesses.

The agency Small Business Technical Advisor (SBTA) is appointed and acts in accordance with the agency's regulations. The SBTA will make recommendations in accordance with agency procedures as to whether a particular acquisition should be awarded under FAR Subpart 19.5 as a small business set-aside; under Subpart 19.8 as a Section 8(a) award; or under Subpart 19.13 as a HUBZone set-aside.

The Office of Small and Disadvantaged Business Utilization (OSDBU) is appointed and serves as OPM's advocate responsible for the use of all designated small business categories within the Federal acquisition process. The OSDBU is tasked with ensuring OPM complies with federal laws, regulations, and policies to include small business as sources for supplies and services. The OSDBU is also responsible for OPM's subcontracting program.

10.0 REQUIRED SOURCES OF SUPPLY

Government sources of supply must be used to satisfy requirements for supplies and services prior to initiating any acquisition action through contracting. FAR 8.002 states except as required by FAR 8.003, or as otherwise provided by law, agencies will satisfy requirements for supplies and services from or through the sources and publications listed below in descending order of priority.

a. Supplies.

- (1) Agency inventories.
- (2) Excess from other agencies.
- (3) Federal Prison Industries, Inc.
- (4) Supplies which are on the Procurement List maintained by the Committee for Purchase From People Who Are Blind or Severely Disabled.
- (5) Wholesale supply sources, such as stock programs of the General Services Administration (GSA) (see 41 CFR 101-26.3), the Defense Logistics Agency (see 41 CFR 101-26.6), the Department of Veterans Affairs (see 41 CFR 101-26.704), and military inventory control points.
- (6) Mandatory Federal Supply Schedules.
- (7) Optional use Federal Supply Schedules.
- (8) Commercial sources (including educational and nonprofit institutions).

b. Services.

- (1) Services which are on the Procurement List maintained by the Committee for Purchase From People Who Are Blind or Severely Disabled.
- (2) Mandatory Federal Supply Schedules.
- (3) Optional use Federal Supply Schedules.
- (4) Federal Prison Industries, Inc. or commercial sources (including educational and nonprofit institutions).

c. Sources.

Sources other than those listed above may be used as prescribed in 41 CFR 101-26.301 and in unusual and compelling urgency as prescribed in FAR 6.302-2 and in 41 CFR 101-25.101-5.

d. Statutory Obligations.

The statutory obligation for Government agencies to satisfy their requirements for supplies or services available from the Committee for Purchase From People Who Are Blind or

Severely Disabled also applies when contractors purchase the supplies or services for Government use.

FAR 8.0003 states that agencies will satisfy requirements for the following supplies or services from or through specified sources, as applicable:

- (1) Public utility services;
- (2) Printing and related supplies;
- (3) Leased motor vehicles;
- (4) Strategic and critical materials (e.g., metals and ores) from inventories exceeding Defense National Stockpile requirements. Detailed information is available from the:

Defense National Stockpile Center
8725 John J. Kingman Road, Suite 3229,
Fort Belvoir, VA 22060-6223; and
- (5) Helium.

You must obtain approval from the CCFAS/Facilities Services Group prior to purchasing some equipment and furniture. You must obtain approval from the CCFAS/Publications Management Group prior to purchasing any printing services. You must use the OCIO approval database prior to purchasing IT equipment. Contact the CO to determine when these approvals are required.

11.0 GOVERNMENT PURCHASE CARD PROGRAM

All individuals serving as cardholders and approving officials are delegated purchasing authority by the OPM Senior Procurement Executive. All cardholders and approving officials are required to complete training prior to receiving a purchase card. See OPM Contracting Policy Number 13.301 – OPM Purchase Card Program ([Attachment 2](#)) for complete information regarding the OPM Purchase Card Program.

12.0 COMPETITION REQUIREMENTS

Competition is not required in micro-purchases (purchases under \$3,000 using the purchase card), although "rotation of sources" is required. However, micro-purchases are the only type of contract where competition need not be considered. Soliciting small businesses is encouraged.

In passing the Competition in Contracting Act, it was the intent of Congress to promote "full and open competition." This means 1) that opportunities for Government business be advertised as widely as practicable; 2) that adequate time is allowed for preparation and submission of offers; and (3) all responsible sources are permitted to compete for Government contracts. This

means competition may not be limited to one or a few sources; requirements specified by brand name only; or an extremely short time-frame allowed for response by offerors without written justification and approval. A “Justification for Other than Full and Open Competition”, or JOFOC, varies in the depth of detail required. The level of review and approval required depends on the dollar value, but it is designed to explain in writing the circumstances justifying other than full and open competition.

12.1 Full and Open Competition

Full and open competition occurs when there are no restrictions placed on who may make an offer on a solicitation. The solicitation notice is placed on the web, for viewing by the public, at <http://www.fbo.gov>.

12.2 Set-Asides

Depending on the item, it may be decided that the acquisition will be restricted to only small businesses, 8(a) contractors, or another business category. In this case, the public notice states that only those designated business types may submit an offer on the solicitation. When determining whether to set aside an acquisition, the following should be considered: Small Business Set-Aside: FAR 19.502-2(a) automatically reserves all acquisitions between \$3,000 and \$100,000 exclusively for small business concerns. These requirements will be set aside unless the CO decides there is not a reasonable expectation of obtaining offers from two or more responsible small business concerns that are competitive in terms of market prices, quality, and delivery.

Please consult with the CO or Small Business Technical Advisor (SBTA).

13.0 OPEN MARKET REQUIREMENTS

All open market requirements estimated at over \$10,000 are required to be publicly posted on the CCFAS/CG bulletin board for 10 days and if over \$25,000, to be published in the FedBizOpps (<http://www.fbo.gov>) for at least 15 calendar days prior to the issuance of a solicitation unless an exception at FAR 5.202 applies to the proposed purchase, except that for commercial items, the CO may (see FAR 5.203) –

- a. Establish a shorter period for issuance of the solicitation; or
- b. Use the combined synopsis and solicitation procedure prescribed in FAR 12.603.

The CO is not required to submit the notice required by 5.201 when the CO determines the proposed contract action is made under the conditions described in FAR 6.302-2 if unusual and compelling urgency precludes competition to the maximum extent practical and the Government would be seriously injured if the agency complies with the time periods specified in FAR 5.203 or, for purchases conducted using simplified acquisition procedures at FAR 12.603. Such determination to use FAR 6.302-2 requires a justification (FAR 6.303-2) and approval (FAR 6.304).

14.0 SOLE SOURCE REQUIREMENTS

If your SAT or acquisition plan limits the availability of the item or service to one source (sole source), the request must be accompanied by a full justification explaining why the item or service is the only one that will meet the Government's needs and a requisition. This sole source statement must be attached to the requisition. Sole source requirements under \$100,000 may be justified on the SAT. Some sole source requirements over \$100,000 require a Justification for Other than Full and Open Competition (JOFOC) ([see Attachment 12](#)) for a JOFOC template). Contact the CO to determine when a JOFOC is required.

- a. The justification must demonstrate that only one source and no other type of supplies/services will satisfy the minimum needs of the Government. Some reasons are:
 - (1) Specifications/drawings contain proprietary or restricted use legends,
 - (2) It is necessary that the item/part be acquired from the one source that is compatible and interchangeable with existing equipment, or
 - (3) The work is so specialized that cost to train new vendor will be excessive.
- b. It is insufficient to simply state that the contractor is unique. The unique characteristics must be set forth, the unique expertise must be described, or the unique equipment or facilities or proprietary data be explained in detail.
- c. A statement that a contractor has the best capability or offers the lowest price or is the only qualified source is not justification for sole source. A presentation that claims the recommended source is most highly qualified to perform but does not establish why other sources cannot perform is unacceptable. Your statement must convincingly establish why other sources can't perform.
- d. Incumbency does not always justify sole source.
- e. Administrative delay, lack of adequate advance planning or lack of an approved funding document does not create an urgency that justifies sole source.
 - (1) Timeframe does not justify a sole source. If time is a factor the following data must be explained;
 - (2) Provide the date by which the supplies/services must be delivered;
 - (3) Indicate how that date was determined and its significance; and
 - (4) Indicate the impact of delay beyond that date in terms of program schedules, milestones, etc. Again uniqueness and timeframe must not be confused and inappropriately interchanged.

15.0 URGENT ACQUISITION PACKAGES

Urgent acquisition packages are for supplies or services that will result in work stoppage or where mission essential and normal processing time would result in injury to the government.

CCFAS/CG will work urgent requirements that are identified by the customer and documented with a valid urgency impact statement immediately upon receipt. Describe the compelling nature of the urgency, how the Government will be seriously injured, and what the financial implications might be. Urgent requirements can be submitted via AcqTrack, hand-carried, faxed or e-mailed. Requiring activities should call CCFAS/CG to confirm receipt. Once we receive the requirement, we will immediately begin processing the requirement. Good two-way communication is key to a successful transaction.

16.0 RENEWAL OF RENTAL/LEASE/MAINTENANCE AGREEMENTS

At the end of each fiscal year, numerous agreements expire and require renewal on October 1st. In addition, many new requests are submitted. To ensure placement of purchase/delivery orders or a contract in a timely manner, activities are urged to submit their acquisition packages by the date established by the CCFAS/CG. All requirements submitted after that date risk untimely processing. These documents should cite next fiscal year funds with the statement "Subject to Availability of Funds." Requiring activities should ensure all procurement packages for renewal and new rental/lease/maintenance agreements contain adequate information. Provided below is a checklist of required documentation:

- a. Point of contact information – name, telephone number and e-mail address.
- b. Purchase/delivery order number for services during last fiscal year.
- c. Physical location of equipment (building number, street address, room number, name of activity, etc.).
- d. Period of performance.
- e. Place of performance of maintenance or service (building number, street address, room number, name of activity, etc.).
- f. Model number(s), serial number(s), manufacturer's name and if government-owned equipment the acquisition cost of each piece.
- g. Complete statement of work describing maintenance and/or rental services required.
- h. Complete line of accounting for next fiscal year, including cost code and fund code.
- i. If the acquisition cost of Government-owned equipment exceeds \$25,000, provide the name and telephone number of property administrator.
- j. If sole source, fully justify sole source documentation if one company can only perform the services.

- k. If the services are for lease of equipment, a lease versus purchase analysis is required.

NOTE: Government personnel not authorized to commit funds on behalf of the Government should be cautious to not create an "unauthorized commitment." Only warranted COs can commit the Government. Acquisition packages sent to CCFAS/CG should be followed-up by the customer to ensure a purchase/delivery order or contract has been awarded. Customers should not automatically assume a contract award or an order was made if they have not received a cancellation or rejection status from CCFAS/CG.

17.0 RENT/LEASE NOT JUSTIFIED

If you are requesting rent/lease of an item that can be purchased, you must show the calculations justifying your decision. Show the calculations for the rent/lease option and then show the total ownership cost of buying the items. Include the maintenance and other ownership costs in the "purchase scenario" for the entire useful life of the item. Note there could be a salvage value to the Government even after the end of the item's useful life. Based on the calculations, justify your decision to rent/lease rather than purchase.

18.0 INFORMATION TECHNOLOGY REQUIREMENTS

The CCFAS/CG IT Team will support OPM enterprise-wide buying capability for common use information technology and commercial items.

19.0 REJECTION/CANCELLATION POLICY

In order to keep SAT or acquisition plan cancellations to a minimum, it is the policy of CCFAS/CG to work with programs from the beginning of the acquisition. We will review your requirements immediately upon receipt. We will ask customers to provide missing data or corrections to a requisition after receipt by CCFAS/CG, but prior to acceptance by CCFAS/CG as a complete package with an agreed upon deadline for resubmission. If the revised package is not provided within the time frame specified, the package will be returned to the originator.

In the event that document errors or purchase questions are detected after acceptance by CCFAS/CG, we will request the customer provide the missing information. The deadline for submission of missing data for these requisitions will be as agreed upon. If the missing data is not provided within the time frame specified, we will return the package to the originator.

20.0 INTERAGENCY AND INTRA-AGENCY AGREEMENTS

An Interagency Agreement is an agreement between two Agencies where one Agency purchases supplies or services from another Agency. An Intra-agency Agreement is an agreement between two offices within OPM where one office within OPM purchases supplies or services from another office within OPM. The Economy Act authorizes Agencies to enter into

mutual agreements to obtain supplies or services by interagency acquisition (see FAR Subpart 17.5). These Interagency Agreements require a Determination and Finding signed by the CO. Other justification for Interagency Agreements may be found within special appropriation language. See [Attachment 13a](#), [Attachment 13b](#), [Attachment 13c](#) and [Attachment 13d](#) for Work Instructions for processing Interagency and Intra-Agency Agreements when OPM is the buyer, OPM Interagency Agreement Form – Sample – OPM 1616-E, and OPM Intra-Agency Agreement Form – Sample – OPM 1616-A.

You must obtain CIC approval for Interagency and Intra-Agency Agreements over \$250,000. You must prepare an Acquisition Plan for Interagency and Intra-Agency Agreements over \$250,000. If you have an approved Acquisition Plan for recurring Interagency and Intra-Agency Agreements over \$250,000, you do not need to prepare a new Acquisition Plan and can use the approved Acquisition Plan.

21.0 CONTRACTING OFFICER'S REPRESENTATIVE DESIGNATION, DUTIES, AND RESPONSIBILITIES

Under FAR 1.602, the CO may delegate (after receiving the nomination from the requiring activity) the responsibility for administration to a qualified Contracting Officer's Representative (COR). The COR is the requiring activity's technical expert responsible for monitoring the performance of the contract. COR duties usually include receiving the briefings and deliverables, signing the receiving reports and monitoring the contractor's performance to protect the Government's interest. See [Attachment 14](#) for a Designation of Contracting Officer's Representative Memorandum, which states the duties and responsibilities for a COR.

The CO appoints the COR at the time of award, but it is preferable that the proposed COR be part of the planning process from the beginning. The COR **must** be a Government employee. The CO will make sure this individual possesses qualifications and experience commensurate with the authority the individual will exercise.

The COR's records are part of the official contract files and must be sent to the CO for retirement with the official contract files upon completion of the contract or otherwise destroyed at the behest of the CO.

22.0 THE DO'S AND DON'TS OF CONTRACTING

a. The Do's Of Contracting.

Actions you can take to assist in minimizing acquisition lead-time include:

- (1) Present all of the facts up front and completely.
- (2) Coordinate with CCFAS/CG early about your acquisition requirement.
- (3) Provide all of the required documents with your acquisition packages.
- (4) Rely on contracting professionals to use the most efficient and cost effective means available under the law with your understanding and cooperation.

- (5) Use Small Business Programs whenever possible.

b. The Don'ts of Contracting.

Actions customers must avoid while involved in the acquisition process include:

- (1) Talking with potential contractors about ongoing or upcoming acquisitions.
- (2) Contacting contractors to negotiate prices or delivery.
- (3) Providing information on Government estimates to contractors or anyone else who does not have a need to know.
- (4) Telling contractors about their competitor's bid or proposal.
- (5) Making statements, which may be taken as a commitment by the Government.
- (6) Permitting or instructing a contractor to change a contract.
- (7) Modifying the scope of effort prescribed in an existing contract.
- (8) Splitting requirements to stay under a certain dollar amount so it can be purchased using the Governmentwide commercial purchase card or using Simplified Acquisition Procedures.
- (9) Signing letters of intent to purchase.
- (10) Requesting or accepting a loaned piece of equipment, free sample, extra work, or free demonstrations without contacting CCFAS/CG.
- (11) Restricting purchase descriptions to fit the products of a particular contractor.

23.0 OFFICE OF THE GENERAL COUNSEL SUPPORT

The Office of the General Counsel (OGC) provides legal advice to CCFAS/CG. The legal advisors in OGC have extensive experience in Government contract law. They are an integral part of an acquisition team and are involved in every stage of most large acquisitions.



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