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Chapter 4 CONTRACTING ACTIVITIES

4.01 Introduction

This chapter provides the administrative procedures and guidelines for Vocational Rehabilitation and Employment (VR&E) employees who use contracting to provide services to Veterans participating in the Department of Veterans Affairs (VA) VR&E Program.

4.02 References and Resources

Laws: Prompt Payment Act

Regulations: Federal Acquisition Regulations (FAR)
VA Acquisition Regulations (VAAR)

Forms: VA Form (VAF) 90-2237, Request, Turn-In and Receipt for Property or Services
Standard Form (SF) 1449, Solicitation/Contract/Order for Commercial Items

Websites: <http://www.va.gov/SecurityInvestigationsCenter>
<https://vaww.portal2.va.gov/sites/SPLNCIOR05/vba/VBA%20Acquisition%20Community/VBA%20Acquisition%20Customer/SitePages/Home.aspx>
http://www.vba.va.gov/bln/vre/epss/VetSuccess_JST/default.html
<http://vbaw.vba.va.gov/bl/20/cfo/MLAC/CAATSTRNGMANUALS.htm>

4.03 Background

The Veterans Benefits Administration (VBA) is charged with providing assistance through VR&E services to Veterans who have service-connected disabilities. Contractor assistance may be needed to supplement and complement services typically provided by VR&E staff.

a. Contracting Processes

VR&E contracting activities involve two distinct processes:

- The first, implemented at a national level, is referred to as the VetSuccess contracts.
- The latter is conducted through local procurement of VR&E services

identified in the VetSuccess contracts when the contracting requirement does not exceed \$25,000 annually or for services not included in the VetSuccess contracts.

b. Veterans Benefits Administration (VBA) Acquisition Workforce

The VBA acquisition workforce, formerly under the VBA Office of Field Operations (OFO), was realigned on March 24, 2013, to report to the Head of the Contracting Activity (HCA)/VBA Acquisition Director through subordinate Supervisory Contract Specialists. The VBA Acquisition Director is responsible for overseeing and coordinating all VBA acquisition activities by VBA Contracting Officers (CO) to ensure timely and compliant contract awards in support of VBA missions. VR&E staff must consult with the local VBA CO on issues related to making purchases over the micro-purchase threshold.

c. Micro-purchases

A micro-purchase is an acquisition of supplies or services using simplified acquisition procedures where the amount of the total requirement does not exceed the micro-purchase threshold set by Federal Acquisition Regulation (FAR). VR&E staff must be aware of the following micro-purchase limits:

1. The standard micro-purchase threshold is currently \$3,500 per transaction unless subject to the Davis-Bacon Act or Service Contract Act.
2. For acquisition of construction subject to the Davis-Bacon Act, the threshold is \$2,000 per transaction.
3. For acquisition of services subject to the Service Contract Act, the threshold is \$2,500 per transaction.

The government purchase card should be used by VR&E staff for purchases under the micro-purchase threshold whenever an item cannot be purchased from a facility bookstore. The cardholder must comply with single purchase limits and must not split purchases. Refer to M28R.V.B.5 for more information on the proper use of the government purchase card. Refer to section 4.05.d for information on how to process a micro-purchase.

d. Acquisition Resources

1. VBA Acquisition SharePoint

The VBA Acquisition SharePoint is available to assist VBA Acquisition customers in executing timely and cost-effective solutions to contracting

issues. This site provides contact information and templates to assist in completing procurement packages. To access the SharePoint, go to <https://vawww.portal2.va.gov/sites/SPLNCIOR05/vba/VBA%20Acquisition%20Community/VBA%20Acquisition%20Customer/SitePages/Home.aspx>

2. Acquisition Tools

The following acquisition tools were developed to assist VR&E staff in understanding and following important processes:

- Appendix P, Acquisition Timeline
- Appendix S, Customer Guide to Requirements Writing
- Appendix X, Socio-economic Considerations
- Appendix AR, Technical Evaluation Team
- Appendix BN, After the Contract is Awarded
- Appendix BQ, Acquisition Glossary

4.04 The VetSuccess Contracts

The VetSuccess contracts are a firm-fixed-price, indefinite-quantity/indefinite-delivery, multiple-award contract vehicle awarded per regional office (RO) that are managed by the Strategic Acquisition Center – Frederick (SAC-F). The VetSuccess contracts are awarded at the national level. The task orders are awarded and administered by the VBA Acquisition Workforce.

a. Type of Services Available

Services available under the VetSuccess contracts include the following:

- Initial evaluation
- Case management
- Employment services
- Educational and vocational counseling
- Discrete services to include evaluations for independent living, life-skills coaching, job coaching, and site analysis

b. Service Groups

The VetSuccess contracts are organized into five Service Groups. Each Service Group has multiple Contract Line Item Numbers (CLINs) and uses one Budget Object Code (BOC) under three fund types, as outlined in the following table:

Service Group	BOC	Fund Type	CLINS
A: Initial Assessment/Evaluation	2504	General Operating Expense (GOE)	1A1 to 5A5B
B: Case Management/ Rehabilitation Services	2505	GOE	1B1 to 4B4
C: Employment Services	2506	GOE	1C1 to 3C3
D: Educational Vocational Counseling	4192	Educational Vocational Funds (Ed/Voc)	1D1 to 2D2
E: Discrete Services	4147	Readjustment Benefits Account (RB)	1E1 to 4E4
F: Travel CLIN	Same as for the Service Referred	As required by referred service	0004B4 to 4004B4

Allocated funding must be obligated by task orders through the VBA Acquisition Workforce until the end of the base or option year (refer to Appendix BD, VetSuccess Contract Funds). A task order obligates funds to cover a contractor-provided service for a specific time period. It should set a specific amount of money sufficient to cover services needed. Refer to M28R.V.B.1 for more information on cost approval/concurrence levels, fund types, and BOC.

c. Roles and Responsibilities

During the administration of the VetSuccess task orders, either the VR&E Officer or the Assistant VR&E Officer serves as a Contracting Officer's Representative (COR). Refer to Appendix BQ, Acquisition Glossary for description of the duties of a Contracting Officer and COR.

Primary duties of the Administrative Contracting Officer (ACO), COR, VR&E staff, Voucher Auditor, and Contractor are listed as follows:

1. National Contracting Officer

The National Contracting Officer has the following duties:

- Awards contracts.
- Executes changes to contracts.
- Issues final decisions involving matters in dispute that could be litigated.

2. Administrative Contracting Officer (ACO)

The ACO has the following duties:

- Awards all task orders to authorize the start of performance.
- Monitors task orders to ensure compliance with terms of the contract and task order.
- Issues task order modifications that identify services to be performed within the scope of the contract and obligate funds to cover services.
- Resolves any questions or issues that arise during task order performance.

3. Contracting Officer's Representative (COR)/Alternate Contracting Officer's Representative (ACOR)

(a) COR Duties

The COR/ACOR has the following duties:

- (1) Monitors and documents the contractor's performance (within scope of authority) to ensure compliance with technical requirements of the contract or task order as defined in the COR

delegation letter.

- (2) Notifies contractor of any unfavorable background investigation results. Refer to the VA Security and Investigations Center site at the following link for more information on background investigations: <http://www.va.gov/SecurityInvestigationsCenter>
- (3) Issues client referrals.
- (4) Accepts or rejects performance.
- (5) Interprets technical requirements.
- (6) Reviews and certifies invoices above the Approving Official level.
- (7) Reviews and approves travel in accordance with contract or task order terms.
- (8) Participates in meetings to discuss contract performance.

NOTE: ACORs are issued the same delegation as the COR.

(b) COR Limitations

It should be noted that even though the COR has the authority to issue technical interpretations, he/she must not alter contract language. A COR must not take any action that would do any of the following:

- Alter the performance standards.
- Increase the price.
- Otherwise modify the contractual language.

(c) COR Training Requirements

A COR is required to successfully complete 40 hours of Continuous Learning Points (CLPs) every two years. Federal Acquisition Certification (FAC) – COR training is available online through the Federal Acquisition Institute Training Application System (FAITAS). FAC-COR certification consists of competency-based core training, specific training to achieve certification and ongoing continuous learning to maintain certification.

Refer to Appendix Z, FAC-COR Recertification for more information.

3. VR&E Staff

VR&E staff has the following duties:

- (a) Determines if there is a need for a contract service and, if there is a need, prepare a referral for COR approval.
- (b) Provides the contractor with case information.
- (c) Verifies that the contractor-provided services are compliant with VR&E standards.
- (d) Conducts a quality assurance review of the contractor reports and related data to ensure compliance with contract standards.
- (e) Assists the COR in determining if an invoice is approved.

NOTE: A Vocational Rehabilitation Counselor (VRC) or Employment Coordinator (EC) may make referrals even if he/she is not designated as COR.

4. Voucher Auditor

The Voucher Auditor has the following duties:

- (a) Approves payment of VetSuccess contracting invoices in the Centralized Administrative Accounting Transaction System (CAATS) as the Finance Approver and submits the invoice to the Administrative and Loan Accounting Center (ALAC) for payment in the Financial Management System (FMS). Refer to Appendix BQ, Acquisition Glossary for a definition of ALAC.
- (b) Approves or rejects the invoice within three business days of finance approver receipt of the invoice in CAATS.
- (c) Enters payment information into Corporate WINRS (CWINRS) for all Fiscal Year (FY) 2011 and FY 2012 contract service transactions.
- (d) Notifies COR/ACO regarding obligation levels (i.e., increase or decrease of funding).
- (e) Adheres to the Prompt Payment Act requirements for timely payment

of invoices.

5. Contractor

The range of a contractor's role will vary based on each Service Group. The contractor has the following duties:

- Manages referral administrative activities.
- Conducts initial vocational assessments.
- Provides case management services.
- Provides employment services.
- Conducts educational/vocational counseling.
- Provides discrete services.

Refer to Appendix BG, VetSuccess Contractor Information, for a list of active VetSuccess contracts. VetSuccess contractors are encouraged to utilize the VR&E VetSuccess Contractor Job Support Tools portal. The VR&E VetSuccess Contractor Job Support Tools portal provides access to all VetSuccess Contractor Job Support Tools. These tools include the VetSuccess Contractor Gateway and other tools that are available to assist VetSuccess contractors in the performance of their duties and tasks. The portal can be accessed at the following link:

http://www.vba.va.gov/bln/vre/epss/VetSuccess_JST/default.html

d. Procedures

1. Client Referrals

When a VR&E staff member determines there is a need for contract services, a VR&E Contract Referral must be initiated for each individual in CAATS and must be approved by the COR/ACOR against an issued task order. The local ACO issues task orders for a Not-To-Exceed (NTE) amount to cover the anticipated need for services.

Specific referrals against task orders must specify the exact service to be provided for each case and will utilize the NTE amount identified in the task order. This means that the referral must specify the service to be provided for each individual by indicating the Service Group and services required by Line Item Number and price. Once the referral is issued, the

contractor may then perform work under the contract as specified. Each referral request must include the following:

- Task order and referral tracking number issued by VA.
- Individual's name and last 4 digits of the Social Security Number (SSN).
- Benefit chapter.
- Name of provider.
- Description of the work to be performed.
- Identification of period of performance and required due dates.
- Date, total cost authorized, and proper cost code.
- Fiscal year, if payment is to be charged to prior year obligation.
- Authorizing VA signature.

2. Contractor Timeliness

VR&E staff must consider timeliness during quality assurance of the deliverable. Timeliness must also be considered if the deliverable has not been performed by the contractor and the case is returned because the Veteran did not report. Once services begin, contractor participation and attendance at appointments is important to ensure the delivery of services in a timely manner. If a Veteran does not show up for a meeting, the contractor should make more than one attempt to contact the Veteran. If a Veteran misses multiple appointments with a contractor, VR&E staff must review documentation and use professional judgment to verify that the contractor has made sufficient contact attempts.

The following table describes timeliness-related performance requirements as outlined in the VetSuccess contracts:

Service	Performance Standard for Timeliness
Service Group A: Initial Evaluation	Reports must be delivered within 30 days of referral.
Service Group A: Vocational Testing	Test results must be delivered within seven (7) calendar days of testing.
Service Group B: Case Management	Reports are due within seven (7) calendar days of each face-to-face visit, with summary reports required every 30 days and at conclusion of case management services.
Service Group C: Job Readiness Assessment	The report must be delivered within 7 calendar days of initial appointment.
Service Group C: Job Readiness and Job Placement Services	The report must be delivered within 7 calendar days of initial appointment and every 14 calendar days thereafter.
Service Group C: Follow-up services	Twice-monthly progress reports must be delivered to the VA by the 15th and 30th of each month (15th and 28th in February). A final summary report must also be submitted at the conclusion of services to be received within 15 days. Meetings with Veterans must occur as specified in the stages outlined above, with job readiness services continuing throughout as needed.
Service Group D: Initial Educational and Vocational Assessment	A complete initial Educational and Vocational assessment must be delivered in the form of a written report to the VR&E Officer within 30 calendar days after date of the referral for services.

Service	Performance Standard for Timeliness
Service Group D: Educational and Vocational Career Counseling	The contractor must deliver a report of contact within seven days after the completed Educational and Vocational counseling service. If the deliverable date cannot be met due to an issue with the individual receiving services, the contractor must contact the VA counselor prior to that deadline to request an extension. If additional counseling sessions are needed, the contractor must staff the needs with VA as expeditiously as possible to discuss additional referrals needed to ensure prompt service provision.
Service Group E: Discrete Services	Reports for flat-rate packages are due within 30 calendar days of referral. Reports for hourly packages are due within seven calendar days of the conclusion of each ten (10) hours of billing or each 30 calendar days post referral, whichever date is earliest.

3. Quality Assurance

Quality Assurance (QA) is the inspection of the deliverable. VR&E staff must review all documents when reports are received to determine adequacy. The feedback mechanism for acceptance or rejection of the deliverable and additional work needed to complete deliverables is the QA Form (refer to Appendix O, VA Forms).

The QA Form outlines the fundamental quality standards for deliverables in a specific service group and must be completed for each deliverable received. VR&E staff must utilize the QA Form as a quality review instrument to ensure reports and forms submitted by the contractor are in compliance with contract requirements and assess the overall quality of deliverables. VR&E staff should note that for case management, two deliverables may be received for the month, but only one QA Form is required to cover the full month.

If submissions are acceptable, the contractor will be instructed to submit invoices for services rendered through written communication per the QA Form. If reports and other documents are deficient, VR&E staff will inform the contractor of areas requiring improvement or modification using the QA Form. The signed and completed QA Form must be sent to the contractor and ACO via email, and a copy of the form must be saved

in the COR's contract file within five business days of receipt of the deliverable.

The CAATS Quality and Assurance status must also be updated to indicate if the deliverable report was received in a timely manner, and whether it was accepted or rejected (requiring corrections by the contractor). If the QA status is not updated in CAATS, the system will not allow the contractor to submit the invoice to VR&E and an error message will be received.

4. Invoicing Contracts through CAATSs

Invoicing for VetSuccess contracts is processed through CAATS, which is maintained by ALAC and eliminates the need to record referrals and payments in CWINRS. The CAATS application is a web-based system that allows for electronic input and approval of transactions, provides an electronic audit trail, streamlines document and transaction processing, and produces transaction activity reports.

CAATS also provides fund controls for an RO so that referrals cannot exceed the allotted fund limit. It converts hard-copy invoices that are created by contractors into electronic invoices and interfaces with internal sites to be certified and approved by VA. Invoices will not be accepted in CAATS until VR&E staff certifies acceptable performance of deliverables using the appropriate QA Form.

The VR&E Service Group Module in CAATS contains four submodules:

- Referral/Task Order
- Invoice/Payments
- Reports
- Manual WINRS (WM) Payment Voucher Transactions

Contractors use an external website to input invoices that will interface into CAATS – VR&E Service Group-Invoice/ Payment sub-module. Please refer to CAATS Volume 3 – Benefits – VR&E Manual for detailed instructions by accessing the following link:

<http://vbaw.vba.va.gov/bl/20/cfo/MLAC/CAATSTRNGMANUALS.htm>

CAATS user accounts will be assigned to configurable roles to enable various functions in the system. The user is assigned the role he/she is

permitted to perform, as appropriate. The assigned roles are as follows:

- Initiator (VR&E staff)
- VR&E Approver (the VR&E Officer or designee)
- Initiator/VR&E Approver (in some stations VR&E staff may have both roles, but not on the same referral)
- Finance Approver (Support Services Division [SSD] staff approve invoices for payment)

Since users with dual access (Initiator & VR&E Approver role) must not approve a referral order or invoice they submitted, CAATS will not allow the user to perform both actions on a referral or invoice so that a separation of duties is properly enforced.

5. CAATS Process Flow

The CAATS general process flow is as follows:

- (a) Referrals are created by VR&E staff and approved by the COR in the Referral/Task Order sub-module.
- (b) The contractor performs the required services and forwards the deliverable to VR&E staff.
- (c) VR&E staff perform QA on the services provided by the contractor and notify the COR of acceptance.
- (d) The COR indicates in CAATS that the QA is complete and the deliverable is accepted.
- (e) The contractor then creates an invoice on the external website referencing the valid referral number. However, the invoices will not be able to interface with the CAATS application unless the following apply:
 - A valid referral is in the system.
 - The QA (performed outside of the system) has been met.
 - The referral order is in Form Generated status.

- The contractor has billed the correct amount.
- (f) Once accepted by CAATS, the invoice will be displayed in the VR&E Service Group – Invoice/Payment sub-module in Working status.
- (g) The first VR&E representative (initiator) will submit the invoice for approval.
- (h) The second VR&E representative (approver) will either approve or reject the invoice.
- (i) If it is approved, the voucher auditor (finance reviewer) will either approve or reject the invoice.
- (j) After the voucher auditor approves the invoice, the system will generate a WM payment transaction based on the data from the Invoice/Payment sub-module.

6. Payments

Contractors may not submit invoices until VR&E staff certify acceptable performance of deliverables. VA must make payments within 30 calendar days of receipt of the contractor's invoice or acceptance of goods or services. Otherwise, starting on the 31st day, the Government is liable for interest penalties that are compounded monthly. Refer to M28R.V.B.7 for more information about Prompt Payment.

Payments come in several forms under the VetSuccess contracts, depending on the Service Group as listed in the following table:

Service Group	Payment Process
A: Initial Assessment/Evaluation	Fixed Payment: Flat-rate package
B: Case Management/Rehabilitative Services	Fixed Payment: Monthly package
C: Employment Services	Time-and-Material
D: Educational/Vocational Counseling	Fixed Payment: Flat-rate package
E: Discrete Services	Time-and-Material

7. Contractor Performance Assessment Reporting System (CPARS)

At the end of the year, performance assessments are reviewed and used for the preparation of CPARS. Reports are then forwarded to the contractors who have 30 days to review and comment on the information. The CPARS assesses a contractor's performance, both positive and negative, and provides a record on a given contract during a specified period of time. Each assessment must be based on objective data, or measurable data when objective data is not available, that is supportable by program and contract management data. Refer to Appendix BQ, Acquisition Glossary for information on the CPARS.

Disagreements on assessments are handled through the Agency's CPARS Reviewing Official, who is the Contracting Officer.

4.05 Local Contracts

a. Stations with VetSuccess Contracts

All VR&E contracts for services that are available under the VetSuccess contracts must be awarded to a contract awardee unless a VetSuccess contractor is not available to provide a service from one of the five Service Groups. In this situation, the VR&E Officer may procure the same services

offered by the VetSuccess contracts locally with the support of the VBA CO. If the cost of the contract is over \$25,000, the RO Director must submit a request for a waiver to contract locally for the needed services to the Director of VR&E Service. The request must explain why this need cannot be met under the awarded VetSuccess contracts. Responses to waiver requests will be provided within 10 business days.

b. Stations without VetSuccess Contracts

If a station without VetSuccess contracts has a need for contract services, the VR&E Officer may procure the same services offered by the VetSuccess contracts locally with the support of the VBA CO. If the cost of the contract is over \$25,000, the RO Director must submit a request for a waiver to contract locally for the needed services to the Director of VR&E Service. Responses to waiver requests will be provided within 10 business days.

c. Services Not Available through the VetSuccess Contracts

1. Tutorial Assistance

Tutorial assistance is not available through the VetSuccess contracts and may be procured locally. A Veteran may be provided individualized tutorial assistance if it is determined that special assistance beyond that ordinarily given by the facility to students pursuing the same or a similar subject is needed to correct a deficiency.

VA Form 28-1903, Contract for Training and Employment, (See Appendix O, VA Forms) must be used for a tutor contract and must have the concurrence of the VR&E Officer. The CWINRS FMS Vendorizing Sheet (See KMP, Job Aids) must also be completed by the tutor to establish him/her as a vendor in FMS for payment purposes. Refer to M28R.V.B.3 for more information on vendorizing.

In accordance with title 48 of the Code of Federal Regulations (CFR) section 2.101, the assistance of a Contracting Officer must be used if the amount of the tutor contract is over \$2,500. A tutor contract may be awarded by the VR&E Officer provided it is under the micro-purchase threshold of \$2,500.

VR&E staff must enter contract information correctly in CWINRS to reflect the contract award, referrals and payments. CAATS will not be used for these local contracts. A government purchase card may be used as long as the total amount does not exceed \$2,500 and the tutor accepts the government purchase card. The assistance of a VBA CO must be used if

the total amount of tutorial assistance is over \$2,500 or if the tutor does not accept the government purchase card. Since it will be rare that a private tutor will accept the government purchase card, the assistance of a VBA CO will be necessary in most cases. When using the assistance of a VBA CO, the VRC must notify the tutor of the requirement to register in SAM.gov and that vendorization will be initiated by the VBA CO after the registration is complete.

Upon completion of the tutorial services, the VRC must provide an email confirmation that services have been received along with copies of invoice(s) to the VBA CO who awarded the contract. Refer to M28R.V.B.5 for more information on the proper use of the government purchase card.

NOTE: A relative of the Veteran may not provide tutorial assistance. A relative is a person related to the Veteran by blood or marriage, such as spouse, parent, child, brother, sister, uncle, aunt, niece, or nephew.

2. Independent Living (IL) Construction

IL construction projects are not available through the VetSuccess contracts and should be procured with the assistance of a VBA CO if the Veteran is found ineligible for needed special equipment under other programs and benefits administered by VA, such as the Specially Adapted Housing (SAH) Grant and the Home Improvements and Structural Alterations (HISA) Grant. If the individual is eligible under other programs and benefits administered by VA, then the IL construction must be approved under that program before VR&E can provide any assistance and the grant funding a portion of the total project must be clearly defined. Please note that the requirements related to SAH/SHA and HISA grants must be separate from contracts of IL construction provided by VR&E.

Additionally, a waiver is required to contract locally for IL construction services when the contract is over \$15,000. It is the responsibility of the case manager to ensure that criteria and guidelines outlined in M28R.IV.C.9 are properly implemented prior to requesting procurement of IL construction.

The IL construction process requires extensive coordination with other VA programs, as well as outside sources. Locally, each VR&E office will identify outside sources and points of contacts through the assistance of a VBA CO to coordinate services. The procurement process for obtaining IL construction as outlined in this section is a two-step process. The case

manager must work closely with the VBA CO to complete the steps listed below to ensure the process is completed accurately and within regulations set forth in Federal and VA Acquisition Regulations.

(a) Step One

Initiate a project with the Area Supervisory Contracting Officer via email by requesting the assignment of a VBA CO. The Area Supervisor will assign a VBA CO who will then schedule an acquisition planning meeting with the case manager. The project will be reviewed and an acquisition strategy will be formulated. The VBA CO and case manager will discuss the intent and scope of the IL Construction Project, status of available grant programs, the acquisition schedule, and specific steps needed to successfully complete the project in question. Depending on the project details, Construction Management Services (CMS) may be necessary; however, not all projects will require CMS.

NOTE: Although CMS is not required, the services performed by CMS are required.

Typical CMS services/deliverables may include the following:

- Statement of objectives or detailed description of the work required for obtaining quotes from construction contractors.
- Construction cost estimates.
- Material and workmanship inspection services.
- Procurement phase services (i.e., addressing pre-proposal Request For Information [RFI], reviewing contractor quotes, assisting with price/cost analysis, etc.).
- CMS (i.e., submittal and RFI management, schedule coordination, progress payment application review, labor and safety compliance inspections, etc.).

If CMS are determined necessary for a project, the case manager must submit the following items to the VBA CO:

- A VA Form 2237 to confirm funding is available.
- VA Handbook 6500.6, Appendix A Checklist (please ensure the

Information Security Officer [ISO] and Privacy Officer have reviewed the complete requirement and sign before sending to contracting).

- A Performance Work Statement using the template provided by the VBA CO that describes the services required of the CMS contractor.

Once a completed acquisition package is submitted to the VBA CO, the VBA CO will proceed with the procurement process. If the CMS is less than \$2,000, VR&E may be requested to pay CMS via government purchase card. If the CMS is greater than \$2,000, the assigned VBA CO will issue a contract to the CMS firm.

(b) Step Two (Completed after IL Plan approval)

If the project is approved and funded for IL construction, submit a procurement request for construction to the Area Supervisory Contracting Officer.

The procurement request must include the following:

- VAF 90-2237 for \$5,000 to ensure that funding is available.
- Copy of VR&E Approval of IL Construction Project.
- Description of the work to be performed, including the place of performance (Veteran's address).
- The CMS report(s), if applicable.
- VA Handbook 6500.6, Appendix A Checklist - ensure the ISO and Privacy Officer have reviewed the complete construction project and signed before sending the form to contracting).

Once a complete acquisition package is submitted to the VBA CO, the VBA CO will proceed with the procurement process. If the construction bids are less than \$2,000, VR&E may be requested to pay via government purchase card. If the construction bids are greater than \$2,000, the assigned VBA CO will issue a contract to a construction contractor.

(c) Roles and Responsibilities for IL Construction Process:

(1) Case Manager

The case manager's roles and responsibilities are as follows:

- Acts as the Veteran's liaison with the CMS Contractor and VBA CO for the entire IL Construction Process.
- Attends all site visits.
- Ensures procedures for supplies are within guidelines of M28R.V.A.4.
- In collaboration with the VBA CO, provides information to the CMS Contractor.

(2) VBA CO

- In collaboration with the case manager, provides information to the CMS Contractor.
- Manages contract.
- Facilitates communication between case manager and CMS contractor.
- Coordinates final site visit to sign off on project via the case manager.
- Ensures that the project moves forward according to contract schedule.

NOTE: Procurements of Architectural/Engineering services are not permitted.

3. Supplies

Whenever possible, VR&E staff should obtain supplies from a facility bookstore. However, the government purchase card is the preferred method of payment when supplies are not available at a facility bookstore and the total amount of the purchase is under the micro-purchase threshold of \$3,500. The assistance of a VBA CO must be used if the total amount of supplies is over \$3,500, or if the vendor does not accept the government purchase card. It is the responsibility of the case manager to ensure that criteria and guidelines outlined in M28R.V.A.4 are properly

implemented prior to procuring supplies.

d. Processing a Request for Services, Supplies, or Independent Living (IL) Construction

1. How to Process a Micro-Purchase

The government purchase card should be used for all purchases under the micro-purchase threshold if the purchase cannot be made at a facility bookstore. The government purchase card is the preferred method of payment when the amount is under the micro-purchase threshold, and it must be used whenever the vendor will accept the card. Refer to M28R.V.B.5 for more information on the proper use of the government purchase card. VR&E staff should use vendors that accept the government purchase card. In cases where the vendor does not accept the government purchase card, VR&E staff members have no authority to make a micro-purchase. In this situation, only a Contracting Officer is authorized to make the micro-purchase and the steps on how to process a request for services, supplies, or IL construction over the micro-purchase threshold outlined below must be followed.

2. How to Process a Request for Services, IL Construction, or Supplies over the Micro-Purchase Threshold

Services, IL construction, and supplies procurement request packages have different requirements. To ensure VR&E staff members have the most recent information, when preparing requests refer to the checklists and templates found on the VBA Acquisition SharePoint.

All procurement request packages must be emailed directly to the Supervisory Contracting Officer for that regional office to initiate the request. The Supervisory Contracting Officer for a specific area can also be found on the Acquisition SharePoint. See section 4.03.d of this chapter for a link to the Acquisition SharePoint.

3. Contract Obligation and Payment

Contract obligations and payments must be recorded in CWINRS by VR&E staff. CAATS will not be used for these local contracts. Refer to the CWINRS User Guide, Chapter 8: Setup and Admin for more information on entering contract information in CWINRS.

4.06 Unauthorized Commitments

An unauthorized commitment is an agreement that is not binding solely because the Government representative who made it lacked the authority to enter into that agreement on behalf of the Government. It can also apply to the government purchase card in the event the holder exceeds his/her authority to make purchases or splits requirements. VR&E staff must verify the vendor accepts the government purchase card prior to making the purchase.

In the event of an unauthorized commitment, ratification is required before the vendor can be paid. Ratification is the act of approving an unauthorized commitment by an official who has the authority to do so. The decision to ratify an unauthorized commitment may be made in part based on the intent of the action. Unauthorized commitments can and should be avoided through proper planning, understanding one's limited authority, and communicating with the VBA CO.

Refer to Appendix BQ, Acquisition Glossary, for a definition of unauthorized commitments and ratification. Visit the Acquisition SharePoint for templates related to the ratification process. See section 4.03.d of this chapter for a link to the Acquisition SharePoint.

4.07 Foreign Cases

Contracting for case management services may be authorized for Veterans training outside the United States. Contracting activities are conducted in the same manner as those services provided to Veterans residing in the U.S. under the VetSuccess contracts.

The Pittsburgh RO is responsible for contracting services provided in Germany. The Honolulu RO is responsible for contracting services provided in American Samoa. See M28R.V.C.3 for more information on contracting services for foreign cases.

4.08 Oversight

Oversight of VR&E contracting activities is conducted through the established VR&E Site Visit Program (see M28R.VIII.A.3) at the national level, and the execution of a Systematic Analysis of Operations (SAO) – Contracting Activities (see M28R.VIII.A.5) at the RO level. The Management Quality Assurance Service (MQAS) may also conduct a review of contracting activities to ensure compliance with Federal, Department, and Administration policies and procedures. See Appendix BQ, Acquisition Glossary, for a definition of MQAS.

The VR&E Officer is responsible for ensuring that the office is compliant with the VR&E requirements and guidelines for submitting procurement packages to contracting activities, and maintaining the VR&E contract file. The contract file must be available for VR&E oversight purposes and must contain the following documentation:

- Copies of authorizations for services (referrals)
- COR delegation letter
- Quality assurance reports
- Past performance reports
- Executed contract to include signed SF-1449 and price list(s)
- Bilaterally and unilaterally signed modifications
- Contractor's invoices (copies) or a notice in the file of the electronic location of the invoices
- Supporting documents, i.e., proposals and request for VBA CO to process modifications