



SEP 25 2015

GSA Office of Governmentwide Policy

MEMORANDUM FOR PBS HEADS OF CONTRACTING ACTIVITY

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SENIOR PROCUREMENT EXECUTIVE

SUBJECT: Implementation of the GSA Leasing Certification Program

1. What is the purpose of this memorandum?

The purpose of this memorandum is to provide policy and implementation guidance for the deployment of the General Services Administration (GSA) Leasing Certification Program (LCP). This memorandum implements changes to the GSA Contracting Officer Warrant Program (COWP) for Leasing Warrants and becomes effective October 1, 2015. It replaces all previously issued guidance pertaining to GSA's leasing warrants.

2. Why is GSA deploying a Leasing Certification Program (LCP)?

- a. On May 7, 2014, the Office of Federal Procurement Policy (OFPP) issued a memorandum that revised the Federal Acquisition Certification in Contracting (FAC-C), effective October 1, 2014. The memo implemented new FAC-C requirements for GSA's Acquisition Workforce and required that all contracting professionals, regardless of series, hold FAC-C certification pursuant to agency policy.

- b. Under my authority as Senior Procurement Executive (SPE) to establish agency policy in this matter, I have determined that it would not be cost-effective to require leasing contracting officers (LCOs) to attain the FAC-C. Therefore, in collaboration with the Public Buildings Service (PBS), Office of Leasing, my office has developed an alternate certification program. This program leverages current leasing training requirements along with selected project management and acquisition training to implement a GSA alternative certification program for Leasing Contracting Officers. This program will be known as the Leasing Certification Program (LCP). GSA's COWP will require completion of the LCP for warrant issuance.

3. Who does this policy apply to?

- a. GSA personnel - The GSA LCP becomes effective October 1, 2015, and applies to all GSA leasing contracting officers (LCOs), regardless of series.
- b. Non-GSA personnel – When other agencies are using a GSA delegation of authority for leasing, this requirement may also apply. In accordance with [GSA Bulletin FMR C-2](#), Delegations of Lease Acquisition Authority, paragraph 4 (c), *“The authority to lease granted by a delegation may only be exercised by a warranted realty contracting officer fully meeting the experience and training requirements of the Contracting Officer Warrant Program, as specified in section 501.603 of the General Services Administration Acquisition Manual (GSAM) and further revised by GSA Acquisition Letter V-06-06, Supplement Number 1, dated September 3, 2008, and Supplement Number 3, dated May 30, 2013, as these requirements may be revised from time to time.”* The direct link is provided here: [http://www.gsa.gov/portal/mediald/190251/fileName/FMR Bulletin C-2 in Federal Register pdf 2014-08645.action](http://www.gsa.gov/portal/mediald/190251/fileName/FMR_Bulletin_C-2_in_Federal_Register_pdf_2014-08645.action).

4. What is the policy?

The new LCP aligns closely with the previous leasing training requirements. For details, see the attached GSA Leasing Certification Program curricula. For additional information including the Acquisition Career Management Guide to the Leasing Certification Program and other implementation information, please visit the Acquisition Portal on GSA's InSite page and select Career Management or [click here](#) to be immediately redirected. The direct link is provided here:

<https://insite.gsa.gov/portal/content/698026>.

- a. OFPP requires that, effective October 1, 2014, all contracting professionals with an unlimited warrant, must attain FAC-C Level III certification. Without an approved alternative certification program in place, FAC-C is the standard for all contracting officers. In GSA, the SPE has determined that a specialized certification program for leasing contracting officers would be more applicable.
- b. OFPP provided for two years for the attainment for the FAC-C Level III for personnel not previously required to be certified. GSA has obtained a one-year extension from OFPP, in order to allow all LCOs to be certified at the appropriate level no later than September 30, 2017.
- c. OFPP requires that all contracting officers, regardless of series, attain the applicable level of FAC-C which requires a baccalaureate degree and/or 24 semester hours of business at Level I or Level II. OFPP requires both a baccalaureate degree and 24 semester hours of business for Level III. For the

GSA Leasing Certification Program, the education requirement is a baccalaureate degree or 24 semester hours of business credits. Additionally, as SPE, I authorize all LCOs with warrants issued prior to September 30, 2015 to be grandfathered into the education portion of the certification requirement.

- d. Training and experience requirements will not be grandfathered.
- e. Waivers from the LCP certification will only be granted for exceptional and compelling reasons. A Head of Contracting Activity (HCA) must provide a written justification, including the reason for and proposed conditions of the waiver, and a plan to complete the requirements, through the National Leasing Office and the Agency's Certification Manager (ACM) to the SPE.
- f. Recognizing that many LCOs have received extensive training already, the ACM has established implementation guidance that includes reciprocity information and additional information that will assist the workforce in preparing for certification. For additional information, please review the ACM Guide to the Leasing Certification Program.
- g. OFPP policy requires that all personnel with FAC-C attain 80 Continuous Learning Points (CLPs) every two years. GSA's LCP synchronizes with FAC-C by also requiring 80 eligible CLPs every two years. See the [Continuous Learning page](#) on the Acquisition Portal for guidance on attaining CLPs. The direct link is provided here: <https://insite.gsa.gov/portal/content/649346>.
- h. All contracting professionals, regardless of whether they hold a warrant, are required to be registered in the Federal Acquisition Institute Training Application System (FAITAS).

Key Questions:

5. Is my current warrant valid?

Yes. To maintain the warrant, LCOs will be required to complete training in accordance with the schedule set forth below and consistent with COWP requirements at GSAM 501.603.

6. What are the warrant thresholds and implementation dates?

All LCOs, regardless of warrant threshold, must attain LCP Level I no later than June 30, 2016. In addition, LCOs with higher warrant thresholds must attain the appropriate LCP level according to the implementation schedule below.

Leasing Contracting Program Warrant Thresholds	Certification Requirements	Implementation Due Date
Level I - Basic Warrant	LCP Level I	June 30, 2016
Level II - Simplified Warrant	LCP Level I	June 30, 2016
Level II - Intermediate Warrant	LCP Level II	December 31, 2016
Level IV - Senior Unlimited Warrant	LCP Level III	September 30, 2017

7. How will GSA monitor the progress of the LCP?

HCAs, in conjunction with the PBS Office of Leasing, are responsible for ensuring completion of required training. To assist them, the Office of Acquisition Policy within the Office of Governmentwide Policy will facilitate implementation of this certification program.

8. How will FAITAS be used to support the Leasing Certification Program?

- a. The GSA LCP as well as continuous learning points will be managed in FAITAS.
- b. Consistent with the FAITAS Warrant Module activation, leasing warrants will be managed in FAITAS.

9. Where can I go for additional information?

- a. For additional information, please visit the GSA Leasing Certification page on the GSA Acquisition Portal on GSA's InSite or [click here](#) to be immediately directed to the Leasing Certification Page. The direct link is provided here:
<https://insite.gsa.gov/portal/content/698026>.
- b. For guidance on implementing this policy, please first contact your [FAITAS Bureau Certification Manager \(BCM\)](#). The direct link is provided here:
<https://insite.gsa.gov/portal/content/662174>
- c. For guidance on the leasing warrant program, please contact Ms. Denise Broskey (Denise.Broskey@gsa.gov) Director, Center for Lease Acquisition Program Execution, PBS Office of Leasing.

Attachment A – Leasing Certification Program – Level I

GSA Leasing Certification Program (LCP) Level I			
Type of Assignment	Contracting Officer Duties		
Leasing Contracting Officer	Preparation for, negotiation of, award and monitor lease compliance for leasing agreements.		
Prerequisite Requirements	N/A		
Other Certification	Requirement	Training Hours	Delivery Method*
	FAC-COR Level I Certification ⁱ	10	
Leasing Training	FCN 406 Lease Acquisition Training (LAT) ⁱⁱ	40	Classroom
	FCN 407 Real Estate Law or FCN 411 Federal Real Property Lease Law ⁱⁱ	40	Classroom
	GSA ONLY - Leasing Pricing Training ^{iv} (Not applicable for delegated agencies)	2.5	Online
Project Management Training	Project Management ^v	24	
Acquisition Training	CON 100 Shaping Smart Business Arrangements or FCN 101 Contracting Basics	20	Online
	FAC 043 Ethics and Procurement Integrity for the Acquisition Workforce	1	Online
	FAC 031 Small Business Programs	2.5	Online
	HBS 428 Negotiating	2	Online
	CLC 047 Contract Negotiation Techniques	2	Online
	FAC 038 How to Integrate Green into Procurement	2	Online
	CLC 004 Market Research	3	Online
	CLC 065 Suspension and Debarment	1	Online
Professional Skills Training	HBS 408 Customer Focus	2	Online
Comparison	LCP	152 Total (approximately 10 classroom days)	
	FAC-C	221 Total (19.5 classroom days)	
Education	Baccalaureate degree from an accredited institution or 24 semester hours of business credits		
Experience	One year of real property leasing experience commensurate with the GS-1170 qualifications standard.		

The footnote explanations are provided after the Level III certification.

Attachment A - Leasing Certification Program – Level II

GSA Leasing Certification Program (LCP) Level II				
Type of Assignment		Contracting Officer Duties		
Leasing Contracting Officer		Preparation for, negotiation of, award and monitor lease compliance for leasing agreements.		
Prerequisite Requirements		All Level I Certification Requirements		
Other Certification		Requirement	Training Hours	Delivery Method*
		FAC-COR Level II Certification ⁱ	40	
Leasing Training		FCN 408 Cost and Price Analysis of Lease Proposals ⁱⁱ	40	Classroom
		FCN 409 Techniques of Negotiating Real Property Leases ⁱⁱ	40	Classroom
		Construction Fundamentals ⁱⁱⁱ	16	As Applicable
		GSA ONLY Introduction to Reimbursable Services Training ^{iv} (<i>Not Applicable for delegated agency personnel</i>)	.5	Online
Project Management Training		Project Management ^v	24	
Acquisition Training		Federal Budgeting Fundamentals ⁱⁱⁱ	24	Classroom
		CLM 016 Cost Estimating	8	Online
		FAC 021 Price Analysis	8	Online
		HBS 426 Marketing Essentials	2	Online
		FAC 026 Cost Analysis	8	Online
		CLC 056 Analyzing Costs	17	Online
Professional Skills Training		Leadership ⁱⁱⁱ	16	As Applicable
Comparison	LCP	243.5 Total (<i>approximately 13 classroom days</i>)		
	FAC-C	301 Total (<i>29 classroom days</i>)		
Education		Baccalaureate degree from an accredited institution or 24 semester hours of business credits		
Experience		Two years of real property leasing experience commensurate with the GS-1170 qualifications standard.		

The footnote explanations are provided after the Level III certification.

Attachment A - Leasing Certification Program Level III

GSA Leasing Certification Program (LCP) Level III				
Type of Assignment		Contracting Officer Duties		
Leasing Contracting Officer		Preparation for, negotiation of, award and monitor lease compliance for leasing agreements.		
Prerequisite Requirements		All Level II Certification Requirements		
Other Certification		Requirement	Training Hours	
		Delivery Method*		
		N/A	N/A	
Leasing Training		FCN 410 Real Estate Appraisal Principles ⁱⁱ	32	Classroom
		Construction Fundamentals ⁱⁱⁱ	8	As Applicable
		Real Estate Finance and Marketing Fundamentals ⁱⁱⁱ	24	As Applicable
Project Management Training		Project Management ^v	32	As Applicable
Acquisition Training		N/A	N/A	
Professional Skills Training		Leadership ⁱⁱⁱ	32	As Applicable
		CLC 045 Partnering	2	Online
		HBS 306 Leading Teams with Emotional Intelligence High Bandwidth	3	Online
		CLC 044 Alternative Disputes Resolution	4	Online
		HBS 440 Team Leadership	2	Online
		HBS 407 Crisis Management	2	Online
Comparison	LCP	141 (approximately 4 classroom days)		
	FAC-C	Varies 101-154 (Min. 10 classroom days)		
Education		Baccalaureate degree from an accredited institution or 24 semester hours of business credits		
Experience		Four years of real property leasing experience commensurate with the GS-1170 qualifications standard.		

Footnotes for Level I, II, and III:

i - FAC-COR Certification (COR – Level I – minimum 8 hours) (COR – Level II – minimum 40 training hours) as posted in the Options on the [GSA Acquisition Portal](#). The direct link is <https://insite.gsa.gov/portal/content/650802>.

ii - The FCN notation that accompanies the core leasing curricula is referencing the same COWP leasing courses previously required by GSA. FCN = Federal Contracting. If you have completed the respective COWP courses, please use the FAITAS Equivalency Request to update your FAITAS training history with this class. Please refer to the ACM Guide to the Leasing Certification Program for additional information.

iii - A list of options for this requirement is maintained collaboratively between the ACM and PBS Office of Leasing and is posted on the Acquisition Portal for BCMs to reference when processing requests for certification. For Construction Fundamentals, Federal Budgeting Fundamentals, Real Estate Finance and Marketing Fundamentals, and Leadership, there are several options available to satisfy these requirements. Please review the sample listing as posted on the [LCP page of the GSA Acquisition Portal](#). The direct link is provided here: <https://insite.gsa.gov/portal/content/698026>.

iv - The GSA-Only training is available in the GSA Online University. After completion the pdf of the certificate must be downloaded and uploaded into FAITAS with the LCP certification request.

v – For the Project Management requirement- Any of the FAC-P/PM curricula *or other applicable program and/or project management training may be used to satisfy this requirement*. The attainment of FAC-P/PM certification is not required as part of this program. A list of options for consideration for this requirement is maintained collaboratively between the ACM and PBS Office of Leasing and is posted on the Acquisition Portal for BCMs to reference when processing requests for certification.

**The method of training delivery may vary based on information obtained from the training provider.*