



GSA Office of the Chief Acquisition Officer

GSA Acquisition Letter V-09-07  
Supplement 1

JUL 23 2009

MEMORANDUM FOR ALL GSA CONTRACTING ACTIVITIES

FROM:

RODNEY P. LANTIER   
ACTING SENIOR PROCUREMENT EXECUTIVE (V)

SUBJECT:

GSA Temporary Waiver Policy and Process for GS 1102  
Contracting Series at Grade 13 and above

1. **Purpose.** This Supplement clarifies that Acquisition Letter V-09-02, "Posting of Justification and Approval Documents", issued May 8, 2009 remains in effect.

2. **Background.** Acquisition Letter V-09-02 issued on July 13, 2009, was inadvertently numbered identically to Acquisition Letter V-09-02 issued on May 8, 2009.

On July 15, 2009, Acquisition Letter V-09-07 was issued. This Acquisition Letter replaced V-09-02 but did not indicate that the Acquisition Letter being replaced was the version dated July 13, 2009.

3. **Effective Date.** Immediately.

4. **Termination Date.** Acquisition Letter V-09-07 and this Supplement remain in effect until revoked or terminated.



GSA Office of the Chief Acquisition Officer

GSA ACQUISITION LETTER V-09-07

JUL 15 2009

MEMORANDUM FOR ALL GSA CONTRACTING ACTIVITIES

FROM: DAVID A. DRABKIN   
ACTING CHIEF ACQUISITION OFFICER (V)

SUBJECT: GSA Temporary Waiver Policy and Process for GS  
1102 Contracting Series at Grades 13 and above.

**1. Purpose:** This Acquisition Letter details GSA's policy on and process for requesting and approving temporary waivers of the mandatory training and education requirements when seeking to place candidates into positions into the Contract Series, GS -1102 at grades 13 and above.

**2. Background:** On January 1, 2000, the Office of Personnel Management (OPM) issued an updated qualification standard for positions in the Contracting Series, GS-1102. This qualification standard grants an agency's Senior Procurement Executive (SPE) authority to waive any or all of the qualification requirements for GS – 1102 positions at and above the GS-13 level. GSA's SPE's authority falls under the Office of the Chief Acquisition Officer (OCAO) and as such will be the final approving authority on any temporary waiver requests.

**3. Effective Date:** Date of Issue.

**4. Termination Date:** This Acquisition Letter remains in effect until revoked or terminated and replaces the previously issued Acquisition Letter V-09-02 in its entirety.

**5. Applicability:** This Acquisition Letter applies to all current and incoming GSA employees in the GS-1102 series.

**6. GSA Waiver Policy and Process:** Current and incoming GSA GS – 1102 employees seeking hiring placement into positions at grades 13 and above are eligible for temporary waiver consideration if they do not meet the OPM qualification standards for the Contract Series, GS -1102 at grades 13 and above listed below:

- I. Completion of all mandatory training prescribed by the Head of an agency for progression to GS – 13 or higher level contracting positions, including at least 4-years experience in contracting or related positions. At least 1 year of that experience must have been specialized experience at or equivalent to work at the next lower level of the position, and must have provided the knowledge, skills, and abilities to perform successfully the work of the position.
- II. A four year course of study leading to a bachelor's degree, which includes or is supplemented by at least 24 semester hours in any combination of the following fields: accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, or organization and management

GSA's policy is to grant a temporary class waiver allowing the hiring of GSA's acquisition workforce members in the GS 1102, Contracting Series at grades 13 and above that have not completed all of the mandatory training required under the Office of Personnel Management (OPM) 1102-qualification standards to be hired. This temporary class waiver is initially granted for a two-year period while an affected acquisition workforce member works to complete the required mandatory training. This temporary class waiver does not affect the education requirements as established under OPM's qualification standard for positions in the GS 1102, Contracting Series. Current GSA 1102 employees who are considered to have met the standard for positions, which they occupied before January 1, 2000, may be granted temporary class waivers related to the mandatory training requirements.

Recent hires from the private sector that currently hold any of the following National Contract Management Association (NCMA) certifications listed below and meet the mandatory education requirements are also eligible for temporary class waiver related to the mandatory training requirements,:

- I. Certified Federal Contract Manager (CFCM) or
- II. Certified Professional Contract Manager (CPCM)

The class waiver status applied to the mandatory training requirements does not extend or apply to mandatory education requirements. All members of GSA's acquisition workforce in the GS 1102 Contracting Series at grades 13 and above must meet the mandatory educational requirements.

Temporary class training or standard education waivers granted may not exceed a period of two (2) years, during which time the employee is required to have completed and met all of the mandatory training and/or education requirements. Failure to meet all training and education requirements within the specified two (2) year timeframe may result in reassignment or possible reduction in grade.

Employees will be required to acknowledge these potential consequences along with the two (2) year timeframe in a signed Condition of Employment Form (see Attachment A) as well as an Individual Development Plan (IDP) developed in consultation with their supervisor. The IDP agreement must identify the missing training and/or educational courses. The employee's supervisor is required to monitor the employee's progress at completing the requirements as a part of the IDP.

The temporary class training and standard education waiver policy as described does not affect the requirements of GSA's Contracting Officer Warrant Program (COWP). All contracting officer warrant applicants must meet the mandatory educational, training and certification requirements for the appropriate warrant level.

Employees and applicants will only be granted temporary education waivers as an exception, not a rule. For vacancy selections, it is expected that selecting officials will hire in accordance with the full requirements of OPM's 1102-qualification standard, particularly when fully qualified applicants exist for consideration.

Only selecting officials may request temporary education waivers and must prepare a written justification that thoroughly establishes why an alternate applicant is the best choice to fill the job vacancy. The additional issues listed below must also be addressed in the justification:

- I. The applicant's demonstrated analytical and decision-making capabilities, job performance, qualifying experience, and any other pertinent details that reflect on the applicant's abilities;
- II. The applicant's actual work achievements, training, and educational accomplishments that clearly demonstrate the applicant's suitability for the position;
- III. The total number of applicants referred to the selecting official and the total number of referred applicants who fully met the qualification standard; and
- IV. An Individual Development Plan which describes how the candidate will meet the requirement within a two (2) year period.

The temporary education waiver request must be approved and signed at all levels within the selecting official's chain-of command, including a written concurrence by the appropriate head of the contracting activity of a Region, Service or Staff office. The request along with its justification and relevant supporting documentation should be submitted to GSA's Acquisition Career Manager who will conduct a review and make a final recommendation to GSA's Senior Procurement Executive.

Requests for extensions of temporary training class or education waivers are allowable but will be strictly limited to well-documented circumstances and must be submitted to GSA's Senior Procurement Executive for approval no later than 90 days prior to the end of the 2-year waiver date. Waiver extensions, if granted, will be valid only for an additional year. Only management officials in the supervisory chain of command for the employee may request waiver extensions; and the head of the contracting activity in a Region, Service, or Staff Office must concur on the extension request prior to forwarding it to GSA's Senior Procurement Executive for consideration.

#### Attachments

A. GSA CONDITION OF EMPLOYMENT FORM

B. OFFICE OF PERSONNEL MANAGEMENT GS-1102 CONTRACT  
SPECIALIST QUALIFICATION STANDARDS

**GENERAL SERVICES ADMINISTRATION**

**AGREEMENT TO CONDITION OF EMPLOYMENT BASED ON EMPLOYEE'S RECEIPT OF  
WAIVER OF TRAINING OR SEMESTER HOURS/COURSE WORK REQUIREMENTS FOR GS-  
1102 POSITION**

1. I, \_\_\_\_\_ (Name of Employee), understand that I have been granted a temporary waiver of training and/or education requirements to allow my placement in the position of \_\_\_\_\_ (position title, pay plan, series and grade) in the \_\_\_\_\_ (regional and organizational entity).
2. I acknowledge and agree that within \_\_\_\_\_ (timeframe) of being placed in this position, I must complete the training courses and/or educational semester hours or equivalent course work listed below or attached to satisfy the core training and/or education requirements associated with the position of \_\_\_\_\_, and that timeframe for completing this training or education begins on \_\_\_\_\_ (date) and will conclude on \_\_\_\_\_ (date).
  - 1.
  - 2.
  - 3.
  - 4.
  - 5.
  6. See attached list of course work.
3. I acknowledge and agree that I may submit a request for an extension of the temporary waiver through my immediate supervisory chain to the GSA Senior Procurement Executive. This request must describe the circumstances that preclude my meeting the training requirements or semester hours/educational course work requirement within the prescribed timeframe, which will be evaluated to reach an appropriate determination resulting in approval or disapproval of my request.
4. I further acknowledge and agree that failure on my part to complete the training requirements or semester hours/course work identified above within the \_\_\_\_\_ (timeframe) or extended timeframe, if approved, could result in my reassignment, demotion or separation, and that appropriate action in my case will be determined based on the specific circumstances leading to my inability to fulfill these requirements. NOTE: The terms of the condition of employment pertain only to failure on the part of the employee to complete the training or course work, not on any actions that might have been taken on the part of management that might have affected the employee's ability to meet the requirements within the timeframe.
5. I acknowledge and agree that if I am reassigned, demoted or removed due to my failure to meet the training requirements above, I knowingly and voluntarily waive my rights of appeal to the Merit Systems Protection Board and my right to file an administrative grievance or a grievance pursuant to the negotiated grievance procedure with the appropriate union.

\_\_\_\_\_  
(EMPLOYEE'S SIGNATURE)

\_\_\_\_\_  
(DATE)



**United States Office of Personnel Management**

**Operating Manual**

**Qualification Standards for  
General Schedule Positions**

**Individual Occupational Requirements for**

**GS-1102: Contract Specialist**

[ Q&As Available ]

*The text below is extracted verbatim from Section IV-B of the Operating Manual for Qualification Standards for General Schedule Positions (p.166-167), but contains minor edits to conform to web-page requirements.*

***This is an individual qualification standard developed by the Office of Federal Procurement Policy under the authority of 41 U.S.C. 433. It does not apply to Department of Defense positions.***

***Basic Requirements for GS-5 through GS-12***

A. A 4-year course of study leading to a bachelor's degree with a major in any field;

**OR**

B. At least 24 semester hours in any combination of the following fields: accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, or organization and management.

Applicants who meet the criteria for Superior Academic Achievement qualify for positions at the GS-7 level.

The following table shows the amounts of education and/or experience required to qualify for positions GS-7 through GS-12 covered by this standard.

GRADE	EDUCATION	OR	SPECIALIZED EXPERIENCE

<b>GS-7</b>	1 full academic year of graduate education or law school or superior academic achievement	1 year equivalent to at least GS-5
<b>GS-9</b>	2 full academic years of progressively higher level graduate education or masters or equivalent graduate degree or LL.B. or J.D.	1 year equivalent to at least GS-7
<b>GS-11</b>	3 full academic years of progressively higher level graduate education or Ph.D. or equivalent doctoral degree	1 year equivalent to at least GS-9
<b>GS-12 and above</b>	(No educational equivalent)	1 year equivalent to at least next lower grade level
<b>Equivalent combinations of education and experience are qualifying for all grade levels for which both education and experience are acceptable.</b>		

Graduate Education. To qualify for GS-1102 positions on the basis of graduate education, graduate education in one or a combination of the following fields is required: accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, or organization and management.

Note - For positions at GS-7 through GS-12, applicants who are qualifying based on experience must possess at least one year of specialized experience at or equivalent to work at the next lower level, that provided the knowledge, skills, and abilities to perform successfully the work of the position, in addition to meeting the basic requirements in paragraph A or B, above.

- C. Exceptions: Employees in GS-1102 positions will be considered to have met the standard for positions they occupy on January 1, 2000. Employees who occupy GS-1102 positions at grades 5 through 12 will be considered to meet the basic requirements for other GS-1102 positions up to and including those classified at GS-12. This includes positions at other agencies and promotions up through grade 12. However, employees must meet specialized experience requirements when seeking another position.

**Basic Requirements for GS-13 and Above**

- A. Completion of all mandatory training prescribed by the head of the agency for progression to GS-13 or higher level contracting positions, including at least 4-years experience in contracting or related positions. At least 1 year of that experience must have been specialized experience at or equivalent to



work at the next lower level of the position, and must have provided the knowledge, skills, and abilities to perform successfully the work of the position.

**AND**

- B. A 4-year course of study leading to a bachelor's degree, that included or was supplemented by at least 24 semester hours in any combination of the following fields: accounting, business, finance, law, contracts, purchasing, economics, industrial management, marketing, quantitative methods, or organization and management.
- C. Exceptions: Employees in GS-1102 positions will be considered to have met the standard for positions they occupy on January 1, 2000. This also applies to positions at the same grade in the same agency or other agencies if the specialized experience requirements are met. However, they will have to meet the basic requirements and specialized experience requirements in order to qualify for promotion to a higher grade, unless granted a waiver under Paragraph D.
- D. Waiver: When filling a specific vacant position, the senior procurement executive of the selecting agency, at his or her discretion, may waive any or all of the requirements of Paragraphs A and B above if the senior procurement executive certifies that the applicant possesses significant potential for advancement to levels of greater responsibility and authority, based on demonstrated analytical and decision making capabilities, job performance, and qualifying experience. With respect to each waiver granted under this Paragraph D, the senior procurement executive must document for the record the basis of the waiver. If an individual is placed in a position in an agency on the basis of a waiver, the agency may later reassign that individual to another position at the same grade within that agency without additional waiver action.

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## SAMPLE Condition of Employment Agreement

### GENERAL SERVICES ADMINISTRATION

#### AGREEMENT TO CONDITION OF EMPLOYMENT BASED ON EMPLOYEE'S RECEIPT OF WAIVER OF TRAINING AND/ OR EDUCATIONAL REQUIREMENTS FOR GS-1102 POSITION

1. I, \_\_\_\_\_ (Name of Employee), understand that I have been granted a temporary waiver of training and/or educational requirements to allow my placement in the position of \_\_\_\_\_ (position title, pay plan, series and grade) in the \_\_\_\_\_ (regional and organizational entity).
  
2. I acknowledge and agree that within \_\_\_\_\_ (timeframe) of being placed in this position, I must complete the training and/or courses listed below to satisfy the core training and/or educational requirements associated with the position of \_\_\_\_\_, and that timeframe for completing this training begins on \_\_\_\_\_ (date) and will conclude on \_\_\_\_\_ (date).
  - 1.
  - 2.
  - 3.
  - 4.
  - 5.
  - 6.
  
3. I acknowledge and agree that I may submit a request for an extension of the temporary waiver to the Senior Procurement Executive in GSA's Office of the Chief Acquisition Officer. This request must describe the circumstances that preclude my meeting the training and/or educational requirement within the prescribed timeframe which will be evaluated to reach an appropriate determination resulting in approval or disapproval of my request.
  
4. I further acknowledge and agree that failure on my part to complete the training and/or educational requirements identified above within the \_\_\_\_\_ (timeframe) or extended timeframe, if approved, could result in my reassignment, demotion or separation, and that appropriate action in my case will be determined based on the specific circumstances leading to my inability to fulfill these requirements. NOTE: The terms of the condition of employment pertains only to failure on the part of the employee to complete the training and/or educational requirements, and not on any actions that might have been taken on the part of management that might have impacted the employee's ability to meet the requirements within the timeframe.

5. I acknowledge and agree that if I am reassigned, demoted or removed due to my failure to meet the training and/or educational requirements above, I knowingly and voluntarily waive my rights of appeal to the Merit system Protection Board, to file an administrative grievance, or grievance pursuant to the negotiated grievance procedure with the appropriate union.

\_\_\_\_\_  
(EMPLOYEE'S SIGNATURE)

\_\_\_\_\_  
(DATE)