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Question: I understand that the Defense Acquisition University (DAU) e-learning site will be unavailable through at least mid-September, but I need to earn continuous learning points (CLPs) to maintain my certification. In the meantime, are there other options for earning CLPs that have DAU equivalency?

ASI Government's Research Response:

DAU equivalency is not required for earning continuous learning points (CLPs); DAU equivalency is only required for the core courses required for initial FAC-C Certification.¹ Since DAU equivalency is not required for CLPs or electives, there are a variety of other options for maintaining your certification.

Continuous learning requirements are assigned separately by function, with requirements specific to contracting personnel (FAC-C), program or project managers (FAC-P/PM), and Contracting Officer Representatives / Contracting Officer Technical Representatives (CORs/COTRs) (FAC-COTR). We examine each of the requirements and the options for achieving them below.

FAC-C

For contracting requirements under the FAC-C program, the policy states:

“Continuous learning activities include, but are not limited to, the following:

- training activities, such as teaching, self-directed study, mentoring;
- courses completed to achieve certification at the next higher level;
- professional activities, such as attending/speaking/presenting at professional seminars/symposia/conferences, publishing, and attending workshops; or
- educational activities, such as formal training, and formal academic programs.”

The policy requires that training, education and professional development activities used to satisfy CLP requirements be job-related and be agreed to by the supervisor. The best way for an employee to document this when choosing an activity to satisfy a CLP requirement is to enter it on their individual development plan (IDP) and obtain their supervisor's approval. Courses qualifying for

¹ See page 6 of the Federal Acquisition Certification in Contracting Program memorandum of January 20, 2006 (updated December 2008), available at http://www.fai.gov/pdfs/fac_contracting_program.pdf. Details of the CLP requirement are in Appendix B.

continuing education units (CEUs) are worth 10 CLPs for each CEU; other training course modules are worth one CLP for each hour of instruction. The policy leaves flexibility for agencies to assign CLPs, and includes learning modules and training courses “from a recognized training organization” as an example of the kind of opportunities that would be part of the program.

FAC-COTR

The FAC-COTR program² requires 40 hours of initial training, of which 22 hours must be dedicated to meeting “core competencies,” which are defined in technical and professional / business areas. In this case, the core is not stated as a strict DAU equivalency, but there are courses provided for reference. Specifically, the policy states:

“COTRs must have a minimum of 40 hours of training and must maintain their skills currency through continuous learning. The training can be obtained through FAI, the Defense Acquisition University, commercially-available sources, colleges or universities, or agency-specific courses.”

Electives may be defined by the agency, and identified by the employee’s supervisor. The policy provides:

“Examples could include additional training on services, performance-based acquisition, earned value management, time and materials contracts, green purchasing, socioeconomic issues, etc”.

In addition to the initial training, the FAC-COTR program requires 40 CLPs every two years. As with the FAC-C program, there is no equivalency requirement for the CLPs earned by COTRs. CLPs may be earned by taking training courses, teaching, mentoring, professional development activities, or formal education. Government-sponsored courses, professional association seminars and workshops, and commercial courses are available.

FAC-P/PM

The FAC-P/PM program³ features core competencies rather than a core curriculum, and requires 80 CLPs every two years to maintain currency. For CLPs, the policy provides,

“Continuous learning activities related to program and project management activities include, but are not limited to, the following:

- training activities, such as teaching, self-directed study, mentoring
- courses completed to achieve certification at the next higher level
- professional activities, such as attending/speaking/presenting at professional seminars/symposia/conferences, publishing and attending workshops
- educational activities, such as formal training, and formal academic programs
- experience such as developmental or rotation assignments”

² Described in the OFPP memorandum of November 26, 2007, available at <http://www.fai.gov/pdfs/11-26-COTR-Memo.pdf>. See especially pages 3 and 4 for core and elective courses, and Appendix A for CLPs.

³ Policy, described in the OFPP memorandum of April 25, 2007, is available at http://www.whitehouse.gov/sites/default/files/omb/procurement/workforce/fed_acq_cert_042507.pdf.

Therefore, a program or project manager desiring to earn CLPs has a great deal of flexibility, and should work with his or her supervisor to incorporate the appropriate courses and other professional development into the IDP.

For all three programs, there is a great deal of flexibility in how a professional can earn CLPs to maintain a certification. For the FAC-C and FAC-COTR programs, the policy states that upon agency request, FAI will review the agency's program against the requirement in the policy and correlate the agency and FAI requirements.

There are many government and non-government sources of training that can be used to meet the continuous learning requirements of all three programs, including Federal Acquisition Institute (FAI) seminars and courses, professional associations such as the National Contract Management Association and commercial firms offering either classroom or online training services. ASI Government's Applied Learning Online™ (ALO) e-learning suite⁴ is an example of the kind of training that is available through commercial sources.

Conclusion:

CLPs, as well as elective courses used toward the FAC-C certificate, do not need to be DAU equivalent. They do need to be job-related and enhance the individual's professional competency. Agencies have flexibility to determine what kind of training beyond the core courses is important for their particular mission, and supervisors should assist employees in determining the best training and development package for their individual situation.

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The information and opinions in this document are based on professional research of available information using sources deemed reliable. If your question involves legal issues, you may wish to consult an attorney for legal advice based on your particular situation.

⁴ Details are available at <https://www.appliedlearningonline.com/>