

Tuition Ordering and Payment Process Handbook – Appendix A-22

SUBJECT: Frequently Asked Questions (FAQs)

PURPOSE: To inform Prospective NROTC unit Ordering Officers of the answers to frequently asked questions.

OVERVIEW: The handbook is designed to provide process guidance and standardized procedures to assist the NROTC unit Ordering Officer's in the performance of their duties. This section is designed to answer frequently asked questions not specifically addressed elsewhere in this handbook and appendixes.

ACTION REQUIRED:

1. Adhere to the guidance contained on the following pages.

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ESA GENERAL QUESTIONS

Q. I passed my PPMAP audit with no discrepancies, how come NSTC audit team annotated discrepancies?

A. PPMAP auditors are currently auditing your program at the macro-level, the NSTC audit team is auditing at the micro-level to include proper filling in forms, contract administration, close-out procedures, compliance with financial and acquisition regulations, etc. It is anticipated that as time goes by and DoD FIAR audits being congressionally mandated, PPMAP will also become more stringent. The guidance in this document will ensure units successfully passing the PPMP, internal-IG audits, OD assists visits and congressional FIAR audits.

Q. The previous guidance was that my title was “Contracting Officer”, why is it now “Ordering Officer”?

A. The legal documentation that referenced the term “Contracting Officer” has been re-written and all delegation letters being re-worded to use the term ordering. NSTC has spearheaded this change for numerous reasons with the primary reason being that NROTC unit Ordering Officers cannot meet the certification and training requirements under the Defense Acquisition Workforce Improvement Act (DAWIA) to be appointed as a Contracting Officers. The title is also very misleading due to the very narrow contracting limitation in which the units are delegated. As such, Ordering Officer is the most appropriate title to use.

Q. The college my ESA is with consolidated with another college or changed their name, is my ESA valid?

A. No, when a college changes its name, then the ESA is no longer valid and requires either a new agreement be made between FLC Norfolk and the college or for a Novation agreement has to be done per FAR Subpart 42.12. The same holds true when colleges combine. In these incidences, immediately contact the NSTC Contract Administrator for guidance.

Q. NAVSUPINST 4200.85D states that I have to retain my files for 3 years, however this handbook states 10 years, which is correct.

A. The Navy has issued new guidance per Deputy Assistant Secretary of the Navy Financial Operations Memorandum of 29Jan15 that all financial documents and contract files have to be maintained for 10 years due to congressional Financial Improvement and Audit Readiness (FIAR) requirements.

Q. My school provides exceptional service so why can't the NROTC unit quality control assessor evaluate them as exceptional?

A. FLC Norfolk Policy and Procedures Department states "This action is an Educational Services Agreement that merely provides the method for tuition payment for Students enrolled in <name of school> under the Navy's ROTC program. As such, there is no statement of work against which contract performance can be assessed. The Agreement requires the student be enrolled at established catalog prices; therefore, the acceptable rating assigned considers only whether the school is complying with the requirement to provide courses at established catalog prices. Therefore, it is not possible for the school to receive higher than a SATISFACTORY rating."

Q. Another NROTC unit doesn't have an ordering officer; can I place orders for them?

A. *For ESA's that contain the 01 October language in Paragraph 3(e), the answer is no due the ESA limits the ordering individual to having to be a member of the NROTC unit at the university. The workaround this legal limitation is for an ordering officer to go TDY to the unit needing assistance. Once they are attached to that unit, then the legal limiting factor no longer applies.*

For ESA's that contain the 45-day language in Paragraph 3(e), the language that limits the individual to having to be part of the NROTC unit has been removed and therefore are allowed to. With the restrictive language no longer included in the ESAs, it is legally allowable to place orders on any of NSTC's ESAs. This practice shall only be done when there is no other option to placing tuition orders. In doing so, follow these guidelines:

- The requesting unit Commanding Officer should request, in writing, to the Command Officer of the unit placing the order. This request should clearly contain what services should be ordered, quantities, prices and which command will inspect and accept services. A copy of this request shall be filed in the contract folder.
- The NROTC Unit Ordering Officer shall follow the procedures in this guideline and place the order against the requesting unit's ESA. Block 6 and Block 7 of the DD Form 1155 will be the ordering unit's information. Block 14 will be the requesting unit's information.
- Orders shall be forwarded to the university via the NROTC unit that is hosted by that university.
- Special attention must be given to the WAWF routing table to ensure the university properly submits the invoice.
- To transfer the task order back to the requesting unit, the NROTC Unit Ordering Officer will execute a unilateral modification (SF-30) with an explanation of a transfer of Block 14. The unit shall keep a certified copy of the contract file and forward the originals back to the requesting command.
- If the order is not transferred back to the requesting command, then once the order is closed out, the issuing command will forward a certified copy of the contract file to the requesting command and maintain the original contract file.

- For processing payments information (DD Form 1155 Blocks 27 through 42) should be filled in by the requesting unit (unless delegated to the issuing unit) indicating that they have properly received the service and authorize it to be processed for payment and return the form back to the issuing command. If the requesting unit delegated this authority, then the requesting unit shall submit written documentation to the issuing unit stating that the services were properly received.

No task order shall be issued against another unit's ESA without first coordinating with that unit.

Q. I have conflicting guidance, which one do I follow?

A. NAVSUP has delegated authority to Fleet Logistics Center, Norfolk to enter into the ESA's used by the NROTC units in which FLC has delegated to the individual NROTC units' Commanding Officers to appoint ordering officers for the sole purpose of ordering tuition from the colleges/universities. This makes the NROTC unit Ordering Officers an agent of FLC while in the performance of these duties. As an agent, the NROTC unit Ordering Officers shall comply with all NAVSUP/FLC and higher level rules, regulations and instructions. Subordinate instructions cannot supersede a law, regulations or higher echelon instruction, only augment it. NSTC instructions and the scholarship contracts do not overrule other regulatory requirements and FLC instructions. If you require further guidance, seek legal advice.

Q. I am out of the office regularly and it prevents me from meeting all of my requirements, can my Commanding Officer appoint an alternate unit ordering officer?

A. If your Commanding Officer believes it is in the best interest of their command, it is within their legal authority to do so. However, each unit ordering officer has to meet the warrant requirements and comply with all aspects of this handbook and regulations.

Q. My ESA states that advance payments are authorized, can the school invoice me early?

A. No. The ESA states that advance payments are authorized per 10 U.S.C. 2396(a)(3). 10 U.S.C 2396 applies only to Advance for Payments for compliance with foreign laws, rent in foreign countries, tuition, public utility services, and pay and supplies of armed forces of friendly foreign countries. This statement is required to be in the ESA per DFARS 237.72, but doesn't apply to NSTC's ESAs due to the language in the agreement.

Q. The Colleges' Student Service tells me my CAGE Code on my ESA is incorrect, should I use the CAGE Code Student Services tells me to use?

A. No, the ESA is specifically with the colleges CAGE Code listed on the ESA. Although a college may have multiple CAGE Codes, each CAGE Code is assigned to a specific business unit within the college and is not-interchangeable with another business unit. If you believe the CAGE Code is incorrect, contact the NSTC Contract Administrator for guidance.

Q. If I believe address or CAGE Code in Block 8 of my ESA is incorrect, can I issue a Task Order to the address/CAGE Code I believe is correct?

A. No, your authority to place orders is limited by the FLC Letter of Delegation to place orders off of the ESA, by placing an order to a different address/CAGE Code, you would be exceeding your level of authority and you would be committing an Unauthorized Commitment.

Q. NETPDC informed me that I could change the CAGE Code and then the invoice could be paid, is this acceptable?

A. No, you DO NOT have legal authority to change CAGE Codes, you MUST use the CAGE Code listed in the ESA. If your school has changed CAGE Codes, this will require the university to contact FLC and request a modification to the ESA. Until this mod occurs, you cannot issue any contract paperwork to the new CAGE Code.

In addition, NETPDC is a bill payment office only, they cannot give you any advice that contradicts any portion of this guidance. In any cases that an outside command attempts to provide additional requirements or guidance, refer the matter to the NSTC Contract Administrator.

FASTDATA

Q. I submitted my DD Form 1149 with the correct CAGE/DUNS/DATA and when I go to generate my DD Form 1155, FASTDATA automatically changes the codes, how do I fix this?

A. There is an issue in FASTDATA when you have too many items stored in your address book. It is recommended to verify your units and your university's addresses periodically and upon changes for accuracies. Address that are no longer valid are recommended to be deleted. This has successfully resolved the issue in the past.

DD FORM 1155 ORDER FOR SUPPLIES OR SERVICES

Q. The directions for completing the DD Form 1149 and DD Form 1155 are different, which one should I follow?

A. You should follow the directions as it applies to the specific form. The DD Form 1149 is a financial document and is to be completed following financial rules and guidance, the DD form 1155 and SF 30 are contract documents and have to be completed following acquisition rules and guidance. This may require editing your DD Form 1155 once you create it from your DD Form 1149 in FASTDATA. Every effort has been made to streamline the process as much as possible.

Q. The Colleges address listed in Block 8 of my ESA is incorrect, what should I do?

A. There is a variety of reasons that the address in Block 8 is not address you believe is correct. Contact the NSTC Contract Administrator for guidance.

Q. In the past I always included Commanding Officer in my unit information in Blocks 6, 7 and 9 of the DD Form 1155, but your examples don't include the CO's title, why?

A. DD Form 1155s and SF 30s are issued by the unit's Ordering Officer, not the Commanding Officer. Per FAR Subpart 2.1, only a Contracting or Ordering Officer can enter into contracts on behalf of the government (within the scope of their warrant). The examples provided are IAW DFARS PGI 253.213-70 and NAVSUPINST 4200.85D.

Q. I improperly coded my DD Form 1155 as an IDC (has a D instead of an F in the task order number) contract (or used the wrong ESA number), how do I correct it?

A. If the DD Form 1155 is not signed by you, then you can go back into FASTDATA and cancel it out and create a new one.

If the DD Form 1155 is signed, then you will need to:

1. Create new 1149 and 1155. Insert the following statement in the last line item of your order:

THIS ORDER IS BEING ISSUED TO REPLACE ORDER NUMBER (insert order number) DUE TO THE ORIGINAL TASK ORDER WAS ERRONEOUSLY ISSUED AS AN IDC (or issued under the wrong ESA number) CONTRACT VICE A TASK ORDER. FASTDATA COMPUTER SYSTEM LIMITATIONS PREVENT THIS ERROR FROM BEING CORRECTED USING AN SF30. TASK ORDER (insert order number) IS CANCELED IN WHOLE.

2. Create a SF 30 for the order being cancelled. Use the language below and include any adjustments also being made such as student count going up or down. The contract you are creating and one you are cancelling services need to match.

This bilateral modification is being issued to cancel this task order in full due to it was erroneously issued as an IDC contract vice a task order (or issued under the wrong ESA number) and this error cannot be corrected due to limitations in the Navy's FASTDATA computer system. This order is being replaced in full with task order number *(insert new task order number)*.

(Modify to reflect each line item being cancelled)

Decrease Line Item AA1 by *(insert qty ordered)* from *(insert qty ordered)* to 0. The total cost of this Lint Item is decreased by *(insert line item total amount)* from *(insert line item total amount)* to \$0.00

(continue listing each line item being canceled)

The total contract price decreased by *(insert how much it was for)* from *(insert how much it was for)* to \$0.00.

3. Send the SF 30 to NSTC Comptroller for signature
4. Send the university both the new task order (1155) and the mod (SF 30) all at once to sign.
5. Verify SAM
5. Once they sign, then you sign
6. Give the college their copy
7. Load both into EDA
8. Report both of them into FPDS
9. File Everything. The new and old orders shall have their own separate file.

SF30 CONTRACT MODIFICATION

Q. I was told that having to do a modification was poor practice or that I didn't do my job right, is this true?

A. Issuing modifications is proper contract administration. As the NROTC unit Ordering Officer, you are solely responsible to ensure the task orders and the files are completely accurate. A modification is not good, bad, or sign of improper job performance. They are a tool to be used to ensure you are doing your job properly and that the contracts/obligated funds are properly managed.

Q. Should I include the student's names on the SF30 or DD Form 1155?

A. It is not appropriate per DFARS Subpart 204.8 or within accepted business practices to include names on either of the two documents. The student listing should be treated as "For Official Use Only" and only be distributed with those that need the information to conduct official business with. SF30's and DD Form 1155s entered into EDA can be released to the general public under the Freedom of Information Act.

Q. Previous guidance had NSTC Comptroller's Office signing block 14 last, why do I have to have them sign it before the college/university and I sign it?

A. FAR 1.602-2(a) and FAR 43.105 requires the ordering officer to ensure that sufficient funds are available for obligation prior to contractually binding the government. NSTC Comptroller's Office signs Block 14 to verify that funds are available. Once the ordering officer signs the document, it is legally binding and the contractor will get paid, however if funds were not available at the time the ordering officer signed the document, the ordering officer committed an Unauthorized Obligation and can be personally held liable for exceeding their authority.

In addition, once the ordering officer signs either the DD 1155 or SF 30, FAR 4.604(b)(2) requires the ordering officer to submit the CAR in FPDS-NG within 3 working days of execution and NMCARS 5204.207-1(b)(1) (as further restricted by NSTC policy) requires the ordering officer to post a copy of the DD 1155 or SF 30 into EDA within three working days of execution. The contract is executed at the time the ordering officer signs the document.

Q. FAR 43.105 and DoD FMR, Vol. 3, Ch.15, para. 150202 only requires me to verify funds are available before executing a modification that causes a price increase, why do I have to have NSTC N8 sign block 14 before executing a modification that decreases the contract price?

A. This is a NSTC requirement. NSTC Comptroller's Office is responsible for the proper fiscal accountability and execution of funds for the entire NSTC domain. By having NSTC Comptroller's Office sign block 14, it provides them notification of the funds being available to be executed towards other mission expenses. In addition, task orders are generated in FASTDATA which requires various workarounds to ensure regulatory compliance that tasks orders issued in the Standard Procurement Systems (SPS), used by contracting commands, perform automatically.

Q. I am issuing a unilateral modification; do I have to submit it to NSTC Comptroller's Office for signature?

A. No, as unilateral modifications are not authorized to be used to change the contract value, NSTC Comptroller's Office only needs to sign bilateral modifications as this type of modification that positively or negatively changes the contract value.

Q. I discovered a mistake in my WAWF table entries, how do I correct it?

A. You will issue a unilateral modification describing what the data is changed to and what the mistake was. You then correct the data in the WAWF clause attachment, upload it into FASTDATA and attach it to the mod. Process the mod as prescribed in this handbook.

Q. I discovered a mistake on my bilateral modification, how do I correct it?

A. Modifications and task order numbers have to be sequential and are legal documents so you cannot just "toss" out an improper mod.

If you did not sign the document. Due to FASTDATA currently does not allow you to go back into the system and correct the document, you will need to:

- Do not sign the document.
- Issue a unilateral mod with the following statement (change the mod number as required):
 - This unilateral modification is being issued to cancel Mod P00001 in its entirety due to an administrative error in which the FASTDATA system will not allow for the document to be corrected. Mod P00001 was not signed by the contractor nor the government and therefore was never executed allowing it to be cancelled using a unilateral mod.
- Issue another mod with the correct information
- Load the document into EDA

If you or the contractor signed the document:

- Issue a bilateral mod with the following statement (change the mod number as required):

- This bilateral modification is being issued to cancel Mod P00001 in its entirety due to an administrative error in which the FASTDATA system will not allow for the document to be corrected.
- Issue another mod with the correct information.
- Load the documents into EDA and FPDS-NG.

SAM

Q. I googled SAM and it took me to a different website than what you have in your examples, can I use this website?

A. No, SAM.GOV is the only authorized website for government contracts. The other websites are commercial websites and do not contain official information.

Q. I typed in my universities CAGE Code and SAM comes back with no found results, why?

A. In the search filter results blocks, select active and inactive and run your query again. If the contractor's SAM account has expired, it will only display as an inactive document.

Q. I typed in my universities CAGE Code and SAM comes back with a restricted message, what do I do?

A. Some contractors register as being restricted. To overcome this, you will need to register for an account at login.gov. Once your account is established, you will need to login and run your SAM search again.

FPDS-NG

Q. What is a Treasury Account Symbol (TAS)?

A. The TAS is the grouping of three funding-related codes that are used in federal budgeting and financial processes. Specifically, the TAS consists of the two-character Agency Identifier, four-character Main Account code, and the three-character Subaccount Code. Note that the Subaccount code is optional. For Navy Operational and Maintenance (OMN) Account, the TAS is 17 1804.

Modifications with \$0 obligations or deobligations do not require a TAS. You may leave the field blank.

Q. What if I forget my password?

A. Use the forgotten password function on the Log in screen. If this doesn't resolve the problem, email the FPDS-NG POC (include your user name in the email) and request to have your account reset.

Q. I took a job with a new unit, why can't I load my documents now?

A. FPDS-NG is DoDAAC specific, you will need to re-register with FPDS-NG and request to have your old DoDAAC access deactivated.

Q. What if I get locked out after 5 unsuccessful attempts at logging in?

A. Contact the FPDS-NG System Administrator identified in handbook's cover letter POC listing.

Q. FPDS-NG keeps timing out or won't let me report my CAR data, what should I do?

A. The first step is to contact the FPDS-NG help desk and the FPDS-NG POC listed in Appendix A-7 to try to resolve. If you are unable to resolve in time to meet the submission deadline, document in a MFR of what the issue is and what you tried to do to correct the issue. Continue to work the issue to resolution. FPDS-NG is DoDAAC specific and has to be entered by the issuing NROTC unit.

Q. I only go into FPDS-NG once a term and it tells me my account is inactive?

A. FPDS-NG requires a user to regularly access the account to keep it active, it is recommended that you log in at least once over 30 days.

Q. I followed the guidelines in submitting my FPDS-NG report and after clearing all of the validate errors, the "Approve" button doesn't become available to select?

A. Several units have reported seeing this issue. After waiting two days, the system activated the "Approve" button and all of them were able complete their FPDS-NG reporting. It is always recommended to complete both FPDS-NG and EDA reporting the same day you sign the DD Form 1155 or SF 30 to ensure you can complete the mandatory reporting in the required timeframe. If you are not able to, document in a MFR stating the reason you were not able to be compliant listing the attempted actions to resolve the issue and other pertinent information and file it in the task order folder.

Q. The Small Business Specialist from FLC is conducting a data call from congress and has notified me that I improperly entered my order as being "Bundled" when it should have actually been Not a Bundled Requirement. I tried to correct it, but FPDS-NG won't allow me too, why?

A. NROTC Unit Ordering Officers do not have access rights to correct submitted data. To correct the data, contact the FLC FPDS-NG POC and request that the data be corrected.

Q. I followed the instructions for entering FPDS-NG and it asks for additional fields that are not in your example, why? Previously I entered them under Basic Ordering Agreement (BOA) and they worked fine. Should I go back to BOA?

A. Older ESAs were improperly entered into FPDS-NG when the agreement was entered into, because of this error, FPDS-NG thinks that they are BOAs. As this error is beyond your control, continue using BOA until your ESA is cancelled out and the next generation ESA is entered into.

EDA

Q. EDA keeps timing out or won't let me upload my DD Form 1155, what should I do?

A. The first step is to contact the EDA help desk and the NROTC WAWF system administrator listed in Appendix A-9 to try to resolve. If you are unable to resolve in time to meet the submission deadline, document in a MFR of what the issue is and what you tried to do to correct the issue. Continue to work the issue to resolution. In the event that the issue cannot be resolved in a timely manner, you can request another NROTC Unit Ordering Officer to load into EDA for you as long as they use your DoDAAC information as EDA is not DoDAAC specific.

Q. Where do I get a copy of my ESA and any modifications issued to my ESA?

A. Follow the guidance in the ESA Appendix A-13 on how to upload documents. Go to the section on running a report. When you get to the part where your ESA and task orders are listed, selected the ESA and any modification hyperlinks to download the ESA and mods.

WAWF

Q. Why do I have to attach my Task Order and Modifications in WAWF when I entered them into EDA?

A. The Task Orders issued under the ESA do not get issued by the Navy's standard contract writing systems. As a result, not all of the information needed for payments transfers to the different systems properly. By attaching the documents, it assists NETPDC and DFAS in processing the invoices for payments.

Q. The school's computer did an upgrade and now I can't access/electronically sign my invoices in WAWF. What should I do?

A. This issue is usually caused by a JAVA application issue. The first step is to work with the college/university IT department to attempt to fix. If this doesn't work, the work around is to email the WAWF POC and request your account be reset for you to access it using a user name and password instead of your CAC.

Q. I only go into WAWF account once a term and it tells me my account is inactive?

A. WAWF requires a user to regularly access the account to keep it active, it is recommended that you log in at least once over 30 days.

Q. Previously the NROTC Ordering Officer was told to add an extension to the DoDAAC to differentiate the offices such as N63310-PSU, the form doesn't allow this. How do I correct this?

A. The adding an extension to your DoDACC to differentiate the different officers is not in compliance with DFARS Appendix F. The form is set-up so that the ordering officer can only enter the information in the proper format. NROTC Ordering Officers shall not add sub-offices codes to DoDAACS. In addition to being non-compliant, adding these sub codes causes payment issues.

REIMBURSEMENTS

Q. When a midshipman comes off of MLOA, my university will issue a full refund credit to the student PRIOR to me issuing a DD Form 1155 or SF 30. Is this allowable?

A. If the university issues a credit back to the midshipman BEFORE the government begins processing the DD Form 1155 or SF 30 as applicable, then yes you may then use the appropriate contract instrument to pay for the tuition.

The issue is that payment has to be made directly to whom the government has a fiscal liability to pay. If the midshipman paid the university then the government's debt is with the midshipman. If the tuition is owed to the university, then the debt is paid to the university. You just can't pay one to pay the other.

Another factor to consider is reasonable time. If the university credits the midshipman within a day or so then this is an ideal situation and requires less paperwork for the government; however, if it takes the university weeks to issue the credit, then you cannot wait for the credit to be issued before processing the paperwork. You are still required to comply with the bona fide need and submission timelines.