

# Tuition Ordering and Payment Policy and Procedures

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# Overview

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This presentation is designed to provide an overview of the requirements and roles in placing and administering scholarship tuition and tutoring services for midshipmen attending on scholarship.

Further in-depth guidance is provided in the NSTC Tuition Ordering and Payment Policy and Procedures located at

<https://www.public.navy.mil/netc/nstc/nrotc/supplybinder.aspx>



# Educational Service Agreements (ESA)

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- Legal Binding Agreement between the Government and a SPECIFIC University
- Establishes the rules of placing and processing tuition orders
  - Defines “What we can Buy”, “What we can Pay for” and how “To Buy”
- This is the **only legal instrument** in which the Government can pay scholarship tuition, tutoring and allowable fees directly to the university.
- Tied directly to the NROTC unit’s primary mission of developing and commissioning Navy and Marine Corps Officers
- Failure to comply with the policy and procedures will most likely result in delays in commissioning of midshipman



# Task Orders

- Tuition and tutoring orders are called Task Orders
  - The actual “Buying” process
  
- Contractual Instruments and are governed by
  - Federal Law
  - Acquisition and Finance Regulations
  - NAVSUP Instructions
  
- Ordering process and regulatory compliance is implemented by the NSTC Tuition Ordering and Payment Policy and Procedures
  
- Following services are ordered under the ESA
  - Tuition
  - Mandatory and non-waiverable Fees
  - Advance Placement Exams
  - University Tutoring Services



# Roles

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## ➤ **Fleet Logistics Center (FLC)**

- Legal authority to enter into and modify the ESA
- Delegates legal authority to appoint an Ordering Officer
- Compliance audits (Procurement Performance Measurement and Assessment Program (PPMAP))

## ➤ **NSTC N416**

- Program Manager
- Issues Ordering and Payment Policies and Procedures
- Compliance Assessment Requirements
  - **NSTC N8**
    - Financial processes owner
  - **NSTC N9**
    - Scholarship Requirements and Medical Retroactive Payment Request determinations and approvals
  - **NETPDC N8**
    - Processes Unit Accepted Invoices for Payment



# Roles

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## ➤ NROTC Commanding Officer

- Appoints a Unit Ordering Officer(s)
- Appoints a Unit Quality Control Officer(s)
- Ensures command roles are performed by Government Employees Only  
*(Inherently Governmental Functions)*
- Ensures a different Government employee is assigned to each role  
*(Separation of Duty Requirements)*
- Establishes internal controls and processes to comply with policy requirements



# Roles

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- **NROTC Requirements Initiator (typically HRA and Advisors)**
  - Determines who meets scholarship eligibility IAW NSTCINST M-1533.2
  - Determines tutoring requirements
  - Provides the Ordering Officer
    - Tutoring
      - Number of needed hours per subject and term
    - Listing of scholarship attendees by category
      - Total, Eligible, MLOA, DoDMERBS, Pending Removal
    - MLOA/DoDMERBs reinstatements/status
  - Coordinate with Ordering Officer and revise requirements as needed
  - Enters all Government paid tuition and fee amounts in the Midshipmen's Service Records



# Roles

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- **NROTC Unit Ordering Officer (typically the Supply Tech)**
  - Exercises **Sole Legal Authority** to Place Orders and Obligate the Government
  - Authority is limited by
    - FLC Letter of Delegation to Appoint an Ordering Officer
    - ESA
    - Certificate of Appointment (SF1402)
  - Issues all Official Ordering Communications to the University
    - Task Order DD Form 1155
    - Modification Form SF 30
    - Tuition Request for Services – Regular Terms Only
      - Who is anticipated to be on scholarship
  - “Voice of the Government” with the university on all aspects of the ordering process
  - Forwards all approved itemized tuition invoices and liquidated reimbursement request to the HRA for inclusion the Midshipmen's Service Records



# Roles

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- **NROTC Quality Control Officer (typically the Executive Officer)**
  - Verifies all Invoices for
    - Properness
    - All charges are allowable and required
    - Charges are allocable to a specific Midshipman
    - Proper supporting documentation
  - Accepts the Invoice on Behalf of the Government
  - Ensures the Government is “Getting What We Paid For”

*Note: NEVER accept invoices greater than the Order Amount or contain charges for services that are not specifically allowed by the ESA*



# Important Contract Systems

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- \*Electronic Document Access (EDA) – Official DoD Contract File repository. All orders and modifications must be entered into.
- \*Federal Procurement Data System – Next Gen (FPDS-NG) – A contract reporting tool to Congress. Also known as a Contract Action Report (CAR).
- System of Award Management (SAM) – A system that combines five other federal systems into one
  - Indicates if the Ordering Officer can do business with the contractor
    - IRS Tax delinquencies
    - Barment List
- \*Wide Area Work Flow (WAWF) – DoD Electronic Invoicing and Payment System.
  - Only manner in which invoices can be submitted

*\* Ordering Officers are required to log into these systems every 30-days to keep the accounts active*



# Mandatory Due By Dates

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- **MUST** be completed prior to the Mandatory Due Date/Times
  - Tuition Order Issuance, Regular terms ----- 46<sup>th</sup> day of term (Scholarship eligibility effective date)
  - Tutoring Order Issuance ----- Prior to service start
  - Tuition Order Issuance , Condensed Classes ----- Before 1<sup>st</sup> day of class
  - Reinstatements Orders Issuance ----- Upon Receipt
  - WAWF Invoice Processing ----- Within 7-days upon receipt
  - SAM Verification ----- 15 days prior to term and 24-hours prior to signing contract documents
  - FPDS-NG Reporting ----- Within 3-days of awarding order/modification
  - EDA Uploading ----- Within 3-days of awarding order/modifications



# Contract Files

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- Legal records and shall be sufficient to “tell the entire story”
- Must contain all required documentation
- The ESA and EACH Task Order has its own separate contract file
- Files shall be properly safeguarded
- Must be maintained for 10-years after the order is closed-out
- Crucial for audits and assessment



# University Provided Tutoring Services

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- Required to obtain tutoring services through the university\*
  - If university does not nor cannot offer the services requirements
    - Obtain documentation or other proof from the university
      - Required new letter start of each school year
    - Summit with GCPC (or Convenience Check if authorized) request
    - File in the ESA folder
- Orders for tutoring services are for “best approximation” hours/sessions and calculated cost requirement
- Issued PRIOR TO tutoring service(s) start date.
- Tutoring services shall be done in the most cost effective manner.
- When tutoring is offered at the different class levels (100, 200, 300, etc. level classes), then services should be ordered for the appropriate class levels.

*\* If listed in paragraph 1(b) of the ESA*



# Condensed Courses

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- Shorter in duration than the standard academic terms (typically less than 45 days). Includes summer school and winter courses
- Eligibility requirements are met when command approves the course
  - Approved IAW NSTCINST M-1533.2
  - Must have met scholarship eligibility requirements before end of last term
  - Submit funding request to NSTC Comptroller prior to approval
- Course is at any ESA or Cross-Town School
  - Follow the tuition ordering policy
  - Order on Task Order
    - Issue prior to convening date
- Courses taken at a non-ESA university
  - PRIOR to convening date
    - Command must approve the course
    - Submit funding request to NSTC Comptroller
  - Scholarship student shall pay for the courses
  - Submit a claim for reimbursement
- All courses taken at a non-host school must be fully transferable



# Failure to Maintain Eligibility

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- Includes
  - Medical (MLOA/DoDMERB)
  - Academic requirements
  - Participation requirements
  - Student withdraws
  
- Occurs before 45-day requirement
  - Not included on the task order
  - Student is liable to pay the university for all tuition and fees
    - Medical – work with school to defer invoicing
  
- Occurs after 45-day requirement
  - Ordering Officer issues a Modification to remove the recipient from the program
  - Government has to pay the tuition and fees to the University
  - Follow the procedures of the current revision of NSTCINST M-1533.2 to pursue any student indebtedness to the government



# Medical Leave of Absence Reinstatement

- NSTC N9 is delegated authority to authorize retroactive scholarship eligibility for MLOA and DoDMERB reinstatements
- Payments are not authorized to be made nor an order issued unless NSTC Comptroller's Officer certifies that funds are available.
- Once Retroactive Payments are authorized and funds are certified
  - Midshipman did not pay the university
    - Ordering Officer shall
      - Current term in progress – issue a order modification
      - Past term – issue a task order
  - Midshipman paid the university
    - Midshipman must file a claim (OF 1164)

*At no time is it legally allowable to issue a tuition payment to the University for the University to refund the payment to the Scholarship Recipient.*



# Self-Assessment

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- Failing PPMAP audits can result in revocation of ordering authority
  
- Ordering Policy Specific Self-Assessment program
  - Appendix A-23 guides the assessor through the process
    - Minimal technical knowledge required
    - Defines Tasks
    - Defines Standard
    - Shows what “Right” looks like
  - Appendix B-9 is a detailed Self-assessment check-list
    - Command Assessment (CATT) Checklist Paraphrases B-9



# Support

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## ➤ **AUDIT, TRAINING AND CUSTOMER SUPPORT**

- Contact NSTC N416
- Support may include, but not limited to:
  - Technical Assistance
  - Pre-Audit Assessments and Assistance
  - FLC audit rebuttals
  - Virtual or on-site program reviews\*
  - Virtual or on-site training\*

*\*Contact N4 Logistic Director for all on-site requests*