

## **Attachment A**

### **CONSTRUCTION, REHABILITATION AND ACQUISITION (CRA) FUNDING PILOT IMPORTANT FREQUENTLY ASKED QUESTIONS**

Question 1: When will the Policy and Requirements Handbook (PRH) be updated to reflect these changes.

The PRH will not be updated to reflect this pilot. The Office of Job Corps will work with the Office of Contracts Management and the Office of Financial Administration (OFA) during Program Year (PY) 2014 to assess this new process, and determine in PY 2015 if this will be a permanent change.

Question 2: Why is this called a “CRA Pilot,” and how long will it last?

The National Office of Job Corps is conducting a small scale preliminary study to determine if streamlining the CRA process will aid centers in expediting correcting deficiencies.

The “CRA Pilot” was initiated in July 2014, and it will be assessed during PY 2014 and determined in PY 2015 if this “CRA Pilot” will be a permanent change.

Question 3: What is the definition of an emergency?

An Emergency Repair is considered a condition that if not immediately corrected would seriously disrupt the program, pose an immediate risk to the health and safety of students or staff, cause loss of property or harm to the environment, or result in the immediately closure of the center.

Question 4: If the Emergency Repair or Non-Emergency CRA funds are used for other than its intended purpose, what are the consequences?

Improper use of these funds may result in removal of funding privileges for all centers for that operating contractor for 1 year.

Question 5: Who has authority to approve all repair requests?

The National Office has delegated approval of repair request to the Regional Director. The Regional Director may delegate his/her authority as needed.

Question 6: When will I be notified of the funded deficiencies per Line B1 (a), Non-emergency Repair Funding?

Line B1 (a), Non-emergency Repair deficiencies are being entered in the Acquisition Management System (AMS) and subsequently entered in the CRA system and the Funded-Not-Corrected Web site. Regional Offices and centers

will receive e-mail notification with the CRA system. Upon receipt of this e-mail, centers may proceed with correcting the deficiency.

Note: Centers must continuously update the CRA system until the project has been completed.

Question 7: Is recordkeeping and reporting required for all deficiencies?

Yes, this requirement is mandated by Federal law. All deficiencies including deficiencies in the “CRA Pilot” must be reported on the CRA Web site currently used by centers with the exception of the Inventory of Need deficiencies.

Centers must maintain all facility records on center, even after contract expiration. All reports are subject to the Office of the Inspector General review.

Also, centers must complete quarterly CRA and Emergency Funding Reports (part of the same spreadsheet) per the attached spreadsheet template. This spreadsheet must also be updated and submitted with each CRA Funding Request via the CRA Request System.

Contractors should note that for the purpose of financial reporting on the 2110 there remains only one CRA category, and the 2110 form (or Financial Management System) does not currently accommodate a breakout between B1 (a) and B1 (b). Therefore, the contractor shall report both B1 (a) and B1 (b) expenses under the same 2110 line.

Question 8: Where must I submit my CRA Quarterly Reports?

CRA Quarterly Reports must be submitted via the CRA Request System currently used for regional projects.

Question 9: Who is responsible for ensuring the reports are accurate?

The Regional Office must review all reports to ensure accuracy and report all discrepancies to the National Office within the reporting quarter.

Question 10: Has the CRA system been modified to reflect changes in the reporting requirements?

No, the system is in the process of being upgraded. In the interim, please explicitly state in the request that you are using the Emergency Repair Fund. (See Attachment B)

Question 11: If the emergency exceeds the center’s Emergency Repair Fund balance, what should I do?

The contractor shall not incur costs under this cost category that exceed available funding. Therefore, the contractor shall maintain a spreadsheet of total funds obligated in line B1 (b) of the modification and use of available funding throughout the contract year and shall notify the COR when costs reach 90 percent of the funding obligated in this modification.

Question 12: Are three bids required or may the center just contact one “reputable” service vendor?

Federal Acquisition Regulations (FAR) requirements, the center operating contract, the Center Purchasing System Review, and the center’s corporate policy requirements are not waived nor superseded. The FAR does have provisions and procedures for restricting competition, and these provisions and procedures should be reviewed, understood and followed whenever competition is restricted.

Question 13: When will the Emergency Repair Funds be added to the contract?

Centers will receive Emergency Repair Funds at the being of the PY 2014, and subsequently, balances will be reviewed over the year to determine center needs.

Question 14: If one deficiency exceeds the 90 percent of the funding obligated in this modification, should I use the allocated emergency amount?

If the contractor requires the use of B1 (b) funding to address an emergency on the center, the contractor shall first obtain approval from the COR to address.

The contractor shall submit the request to the COR via the CRA Web site currently used for regional project approval and include a description of the emergency and the immediate risk that failure to address the emergency poses to health, life, property or environment.

The contractor shall include a brief description of the way in which the contractor will address the emergency, an estimated cost and a timeline for completion.

The COR will review the request and will provide a written approval (if granted) via the CRA Web site. The contractor can then utilize funding obligated in this modification under line B1 (b) to address the emergency.

Question 15: Are Emergency Repair Funds going to be added quarterly or annually?

No. If a center does not use the Emergency Repair Funds, the funds will remain on the contract, and no additional funds will be added to the contract.

If centers use the Emergency Repair Funds, funding needs will be reviewed, and funds will be added on an as needed basis.

Question 16: How do we define “smaller” emergency in terms of dollar amount, or the nature of the emergency?

There is no need to define a “smaller” emergency. If the center has the funds to correct the deficiency, correct it using the Emergency Repair Funds until costs reach 90 percent of the funding obligated in the modification.

Question 17: When should I request new funding for deficiencies?

- a. If a request exceeds the Non-emergency Repair Fund in Line B1(a)
- b. If the costs reach 90 percent of the funding obligated in Line B1(b)

Question 18: What is the process for requesting funding for deficiencies noted in question 17?

The center must submit a new emergency funding request via the CRA Web site currently used to request COR approval (regional office approval). This will be handled through the normal process by following the steps below:

**Process:**

Centers submit request through the CRA Web site currently used to request funding;

1. Regional Office is responsible for reviewing and approving the request to be forward to the Engineering Support Contract (ESC) for technical review and recommendation;
2. ESC will provide necessary comments or recommendations and forward to the National Office of Job Corps for review and approval;
3. National Office will review and approve the request and forward to OFA for review, Financial Operating Plan (FOP), and fund certification;
4. Once funds are certified and a FOP number is assigned, the Contracting Officer (CO) is responsible for modifying the Center Operator contract.

Note: If the Regional Office receives a FOP, please expedite coordinating with the CO to modify the center operator contract.

Question 19: How do I receive training on the CRA System?

If necessary, Job Corps will continue to conduct quarterly Webinars being August 2014. If you questions about the CRA System, please contact the Engineering Support Contract at (703) 616-2200.

## **What should I do if?**

### **Example 1 (Incident occurs during normal hours):**

Excellent Job Corps Center has a balance of \$24,000 in its Emergency Repair Fund when all of its domestic hot water heaters in the male dormitory fail. The lowest estimate received is \$60,000 (\$30,000 each). Note: If the center receives one bid, the centers must continue to follow FAR, their operating contract, and their procurement guidelines to ensure the best value for the government in procuring bids. If only one bid is available, the center must provide a justification in the CRA Request System.

Since the amount exceeds 90 percent of the allocated balance in the Emergency Repair Fund (\$24,000), the center must submit a new request following steps in # 18.

### **Example 2 (Incident occurs during weekend):**

Saturday afternoon, Exceed Job Corps Center experiences a failed compressor for the food storage freezer in the cafeteria. Exceed Job Corps Center has a balance in its Emergency Repair Fund of \$27,000. The lowest bid is \$8,000 to repair. Note: If the center receives one bid, it must continue to follow FAR, its operating contract, and its procurement guidelines to ensure best value for the government in procuring bids. If only one bid is available, the center must provide a justification in the CRA Request System.

Following are questions that should assist centers in determining the next steps in correcting this deficiency:

Question 1: Does this situation meet the definition of an emergency?  
Yes

Question 2: Should I proceed with correcting the deficiency?  
Yes

Question 3: Do I need to do anything on the CRA Web site?  
Yes, you must submit the request in the CRA Web site and the site will assign a deficiency number.

Question 4: Do I need Regional Office approval?  
Yes. If after hours and unable to reach the Regional Office, then the region must approve the project in the CRA Funding Request Web site the next business day. However, the center may proceed with correcting the deficiencies.

Question 5: Do I need a FOP, fund certification or modification?  
No, because the funding has already been placed on the center operator contract.

Question 6: Do I need CO approval to use the Emergency Repair Funds?  
No, you do not need CO approval to use the Emergency Repair Funds.

**Example 3 (Non-Emergency):**

Motivated Job Corps Center has a \$24,000 balance in its Emergency Repair Fund. One of the two domestic hot water heaters in the male dormitory fails. The remaining domestic hot water heater has sufficient capacity to supply the entire load to the dormitory. Note: Centers must continue to follow the FAR, their operating contract, and their procurement guidelines to ensure best value for the government in procuring bids. If only one bid is obtained, the center must provide appropriate justification in their purchasing file and on the CRA funding request Web site.

Question 1: Does this situation meet the definition of an emergency?

No, because the remaining domestic hot water has sufficient capacity to supply the entire load to the dormitory.

Question 2: Should I proceed with correcting the deficiency with the Emergency Repair Fund?

No, the center should submit a new request via the CRA funding request Web site by following the steps below:

Centers submit request through the CRA Web site currently used to request funding;

1. Regional Office is responsible for reviewing and approving the request to be forward to the ESC for technical review and recommendation;
2. ESC will provide necessary comments or recommendations and forward to the National Office of Job Corps for review and approval;
3. National Office will review and approve the request and forward to OFA for review, FOP, and fund certification;
4. Once funds are certified and a FOP number is assigned, the CO is responsible for modifying the Center Operator contract.

Note: If the Regional Office receives a FOP, please expedite coordinating with the CO to modify the center operator contract.