

DOLLARS & SENSE A PROCUREMENT PERSPECTIVE



Fort Bragg, North Carolina
Jun/Sep 00 **Bulletin 00-02**

GOING PAPERLESS

The Secretary of Defense, through the Deputy Undersecretary of Defense (Acquisition and Technology) [DUSD(A&T)] has mandated that the DoD contracting process shall be paperless NLT 1 January 2000. Toward this end, DoD implemented the Standard Procurement System (SPS) for use by all DoD activities. SPS is the automated system used by the acquisition community to write solicitation packages and award contracts resulting from these. SPS was implemented at Fort Bragg in June of 1999.

At the beginning of FY00, Department of the Army awarded a contract to American Management Systems, Inc. for a paperless system that would allow individuals to generate, fund, approve, and review purchase request documents. This system is called AcquiLine. AcquiLine was installed on Fort Bragg during the February – March, 2000 timeframe. A process action team representing units across Fort Bragg was formed and these individuals established the implementation policy for Fort Bragg.

Implementation of the AcquiLine system began with the Garrison activities. A representative from each Garrison activity was trained on the use of AcquiLine and went back to their respective organizations, briefing and training their fellow employees on the use of AcquiLine. Currently, all Garrison activities are now using AcquiLine for purchase request generation.

Currently Womack Army Medical Center, 82nd Airborne Division and COSCOM are in the process of implementing AcquiLine within their organizations. Womack is scheduled to be on-line with AcquiLine by 1 Aug 00. Both the 82nd and COSCOM are scheduled to be on-line during the month of August.

All other organizations, except for Fort Bragg Schools, must submit their purchase requests through AcquiLine by **1 Oct 00**. With the exception of DoD Schools, after **1 Oct 00**, paper purchase requests will not be accepted from any activity unless a waiver has been granted by the Installation Business Office – Contracting. Waivers will be granted on a case-by-case basis when the AcquiLine server is not operational or in an emergency situation where it is felt that the use of AcquiLine could jeopardize the timely award of the requirement.

AcquiLine briefing charts are available for viewing and downloading on the IBO-C home page at <http://www.bragg.army.mil/www-doc/index.htm>. Organizations requiring information concerning the AcquiLine registration process or AcquiLine training should contact Ms. Sundown Rampey at 396-4362, ext. 219.

BUYING GREEN

Executive Order (EO) 12873, dated 20 Oct 93 requires that the Federal Government assume leadership in making more efficient use of natural resources through the acquisition of items made with recovered materials and work to increase and expand markets for recovered materials through greater Federal Government preference and demand for such items. This executive order was later superseded by EO 13101, written to improve the Federal Government's use of recycled-content products, and expand the affirmative procurement program (APP).

Executive Orders are Presidential directives to federal agencies. EO 13101 describes APP requirements for federal agencies, as well as for the groups that oversee them. The result of the executive order is to establish the Government's policy of acquiring, in a cost-effective manner, items composed of the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition without adversely affecting performance requirements or exposing suppliers' employees to undue hazards from the recovered materials.

Toward this end, agencies are required to establish an affirmative procurement program for all EPA-designated guideline items by their agency, with preparation, implementation, and

monitoring of these programs shared between the program personnel and acquisition and procurement personnel.

DoD is preparing its own APP strategic plan, in response to EO 13101 and the government-wide APP Strategic Plan developed by the Office of the Federal Environmental Executive. When complete, the DoD plan will be posted to Fort Bragg Environmental Compliance Branch's website. Additionally, the Public Works Business Center, Environmental Compliance Branch, in coordination with the Installation Business Office – Contracting, is currently developing the Fort Bragg strategic plan that will also be posted to the website.

EPA uses the comprehensive procurement guidelines (CPG) to designate the items covered by the APP. As a result the designated items are known as "guideline items." They consider the availability of the item, the potential impact on the solid waste stream, the economic and technical feasibility of producing the item, and other uses of the recovered materials used to produce the item. EPA has created an excellent web page for CPG information at <http://www.epa.gov/cpg>.

Once a guideline item is designated by EPA, procuring agencies are required by the Resource Conservation Recovery Act (RCRA) and 40 CFR 247 to purchase a product composed of the highest percentage of recovered materials practicable, taking into consideration competition, price, availability, and performance. RCRA defines "procuring agencies" as federal, state, and local agencies, and their contractors, that use appropriated federal funds. According to CPG I, the requirement applies when the purchase price of the item exceeds \$10,000 or when the total cost of such items, or of functionally equivalent items, purchased by the agency during the preceding fiscal year was \$10,000 or more.

In applying the \$10,000 annual threshold, Section 202 of EO 13101 defines the term "agency" to be the Department of Defense, not an individual military department. Therefore, because DoD spends more than \$10,000 annually on each of the guideline items, all CONUS installations must establish AP programs to ensure purchases of all designated guideline items comply with EPA recycled-content requirements and these purchases must

meet or exceed EPA's recommended recycled-content requirements, unless an exemption applies.

Exemptions: Recycled-content products meeting EPA guidelines will always be purchased unless they:

- ✚ Are not available within a reasonable period of time; or
- ✚ Fail to meet the performance standards set forth in applicable specifications or fail to meet reasonable performance standards of the procuring agency; or
- ✚ Are not available from a sufficient number of sources to maintain a satisfactory level of competition (i.e. available from two or more sources); or
- ✚ Are only available at an unreasonable price. If the cost of the recycled-content product exceeds comparable product costs, the cost is considered unreasonable.

An exemption may be claimed if one or more of these criteria are met. To invoke the exemption for those procurement actions exceeding the micro-purchase threshold of \$2,500, a written determination, signed by a general officer, is required for those activities with a general officer. For requiring activities without a general officer, the commander of the activity may sign the written determination. While a written determination is not required under the micro-purchase threshold of \$2,500, it is highly recommended that the file be documented with a brief statement as to which exemption is being invoked.

In summary, the following guidelines are established for Fort Bragg:

- ✚ All purchases of guideline items must comply with EPA recycled-content requirements unless an exemption applies.
- ✚ When making a purchase of guideline items exceeding \$2,500 (including credit card purchases), the purchaser must select products meeting EPA recovered material content requirements unless an exemption applies. If the requirements were not met, a written determination, signed by a general officer, must be placed in the purchase files or credit card files if being purchased by a non-procurement IMPAC cardholder.
- ✚ When making a credit card purchase of guideline items less than \$2,500, the

purchaser (IMPAC cardholder) must select products meeting EPA recovered material content requirements unless an exemption applies. A written determination signed by a general office is not required; however, a brief statement as to which exemption is being invoked should be included in the IMPAC files.

A list of CPG items can be found on the EPA website. This list includes, but is not limited to, copier paper, writing paper, plastic bags, toner cartridges, numerous construction and landscaping products, awards and plaques, signage, etc. Products offered through GSA advantage at <http://www.gsaadvantage.gov> are clearly designated as complying with the executive order by being recycled or energy efficient. In addition to the GSA Advantage web site, the list of CPG items and search engine for finding products made from recycled materials can be found at <http://www.fss.gsa.gov/ENVIRON/recycled-prod.cfm>.

THIS BULLETIN IS AUTHORIZED BY:

Original Signed

**WALTER H. WARFEL
DIRECTOR OF CONTRACTING**