

**To:** VA LCOs and Staff

**Subject:** OCFM ORP VA-Wide Leasing Policy Alert 2023-03: Interim Updates to OCFM RPPM 2021-07 VA Rule of Two and Lease Business Size Requirements

**Date:** Wednesday, February 22, 2023 9:13:23 AM

**Attachments:** [image001.png](#)

---

Good morning!

# Office of Construction and Facilities Management's Office of Real Property's VA-Wide Leasing Policy Alert 2023-03: Interim Updates to OCFM RPPM 2021-07 VA Rule of Two and Lease Business Size Requirements

Effective 9 January 2023, verification of SDVOSB/VOSB certification status is accomplished through SBA's [Veteran Small Business Certification \(sba.gov\)](#) database.  [OCFM RPPM 2021-07, VA Rule of Two and Lease Business Size Review Requirements](#) will be updated to incorporate this change. In the interim, any reference thereunder to Vendor Information Pages (VIP) or VIP shall be construed to mean SBA's [Veteran Small Business Certification \(sba.gov\)](#) database.

Compliance with OCFM RPPM 2021-07 and VA's Rule of Two is mandatory when VA conducts the lease procurement. In the case of a non-competitive lease procurement, a signed VA Form 2268 is still required. Therefore, the aforementioned policy update will also include a new section to address procedures for non-competitive acquisitions of leasehold interests. Until then, LCO's are required to include a completed and LCO signed VA Form 2268 in the eCMS lease contract file documenting non-competitive situations when the VA Rule of Two could not be satisfied.

This policy alert is effective immediately and remains in effect until updated policy is released.

Please submit any questions or concerns to CFM ORP Policy and Programs at [VACO003C7APolicyandProgramsTeam@va.gov](mailto:VACO003C7APolicyandProgramsTeam@va.gov).