

Date: September 4, 2024

From: Executive Director, Office of Construction and Facilities Management (003C)

Subj: Office of Construction and Facilities Management Real Property Policy Memorandum 2024-04: Department of Veterans Affairs Leasing Certification Program (VALCP) Policy (VIEWS 11760595)

To: All VA Leasing Professionals

1. The purpose of this memorandum is to issue revised policy for the Department of Veterans Affairs Leasing Certification Program (VALCP) and rescind Real Property Policy Memorandum (RPPM) 2022-01, Department of Veterans Affairs Leasing Certification Program (VALCP), dated October 7, 2021.
2. The VALCP establishes the requisite minimum level of training, education, and experience required for individuals to be appointed as Lease Contracting Officers (LCO) and the process for issuance of leasing warrants, as set forth in the attached policy. Only individuals appointed under the provisions of this policy, acting within the scope of delegated real property leasing authority, may enter into, amend, administer, and/or terminate a lease on behalf of a VA Real Property Leasing Activity.
3. Detailed information for the VALCP is available on the [VALCP SharePoint](#).
4. This policy is effective immediately and remains in effect until incorporated into the VA Supplement to the General Services Administration Leasing Desk Guide or otherwise rescinded.
5. In accordance with VA Directive and Handbook 0999, Enterprise Directives Management System, Office of Construction and Facilities Management (CFM) policies and procedures are subject to renewal every five years. Policies and procedures will be updated whenever substantive changes are needed, even if this precedes the five-year renewal requirement. CFM issued policies are located on the VA internet at [VA Real Property Policy Program](#) along with other real property policies and guidance.
6. In the event any policy or other guidance issued by any other VA organization pertaining to real property lease acquisitions conflicts with policy or guidance issued by CFM, CFM policy/guidance shall control.

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7. Please direct questions regarding this policy to the Director, Office of Real Property,
Policy and Programs, via email VACO003C7APolicyandProgramsTeam@va.gov.

A handwritten signature in blue ink, appearing to read "Michael D. Brennan". The signature is fluid and cursive, with a large initial "M" and "B".

Michael D. Brennan, Ph.D., AIA
Executive Director

Attachments

Attachment A: Department of Veterans Affairs Leasing Certification Program
(VALCP) Policy

Attachment B: GSA SPE Memorandum SPE-2021-06 Updates to GSA
Leasing Certification Program

Attachment C: Contracting Officer Qualifications Statement

**DEPARTMENT OF VETERANS AFFAIRS
LEASING CERTIFICATION PROGRAM (VALCP) POLICY**

1. PURPOSE.

The purpose of this memorandum is to provide updated policy to implement the Department of Veterans Affairs (VA) Leasing Certification Program (VALCP). The VALCP establishes the requisite minimum level of training, education and experience required for individuals to be appointed as Lease Contracting Officers (LCO) and the process for issuance of leasing warrants.

This policy is applicable to all VA Leasing Professionals, regardless of series, who utilize GSA's delegated or VA's limited authority to lease space.

2. BACKGROUND.

- a. This policy is issued in accordance with General Services Administration (GSA) Bulletin [Federal Management Regulation \(FMR\) C-2](#), paragraph 4(c), which indicates that *"The authority to lease granted by a delegation may only be exercised by a warranted realty contracting officer fully meeting the experience and training requirements of the Contracting Officer Warrant Program, as specified in section 501.603 of the General Services Administration Acquisition Manual (GSAM) and further revised by GSA Acquisition Letter V-06-06, Supplement Number 1, dated September 3, 2008, and Supplement Number 3, dated May 30, 2013, as these requirements may be revised from time to time."*
- b. The GSA's Senior Procurement Executive issued a memorandum on September 25, 2015 deploying a certification program known as the Leasing Certification Program (LCP) that leverages current leasing training requirements along with selected project management and acquisition training, as an alternative to the Federal Acquisition Certification in Contracting (FAC-C) requirements. The attainment of GSA LCP certification is required for a LCO warrant. The 2015 GSA SPE memorandum has been replaced by [GSA Memorandum SPE-2021-06, January 27, 2021](#), which updated the LCP curriculum.
- c. Each agency that utilizes GSA's delegated authority to lease space manages its own version of the GSA LCP. Individual agencies have the ability to add and/or tailor training requirements to suit the agency's needs beyond the minimum requirements prescribed by GSA.
- d. The Associate Executive Director, Office of Real Property (ORP) is the delegated Head of Contracting Activity (HCA) for VA's Real Property Lease Program, thereby giving ORP direct authority for all matters related to training, certification, and warranting of VA leasing officials.

3. POLICY.

This policy describes the requirements and process for obtaining a VALCP certification, the VALCP warrant levels, and the requirements and process for obtaining, maintaining, and terminating a VA leasing warrant.

a. VALCP Leasing Certifications.

- (1) **Requirements for LCP Certification.** Consistent with the GSA LCP, the VALCP requires that leasing professionals must be certified at the appropriate LCP level (Level I, II or III) in order to be considered for a leasing warrant. Employees seeking LCP certification must meet the curriculum outlined by GSA in [GSA Memorandum SPE-2021-06, January 27, 2021](#), provided as Attachment B to this policy, and additional requirements established by VA and outlined in the VALCP Readiness Checklist available on the [VALCP SharePoint](#).
- (2) **Requesting LCP Certification.** All leasing professionals must be registered in FAI Cornerstone OnDemand (CSOD). LCP applicants are responsible for preparing and submitting their LCP certification requests in CSOD. The electronic application must include all supporting documentation such as transcripts, training certificates, resume, VALCP Readiness Checklist, and any other supporting documents. Continuous Learning Points (CLPs) shall be identifiable on training certificates to receive credit.
- (3) **Agency Reciprocity.** Given the potential differences for LCP training requirements among agencies, certifications do not follow employees and are not automatically transferrable agency to agency. New employees seeking LCP certification from VA must reapply.
- (4) **Continuous Learning.** To maintain an LCP certification, leasing professionals are required to earn 100 continuous learning points (CLPs) every 2 years consistent with the competencies associated with the Leasing Certification (i.e., leasing, project management, acquisition, and professional skills) beginning with the common continuous learning period. Leasing professionals are responsible for maintaining a copy of their training history and source documents used for certification requests and evidence of continuous learning.

b. VA Leasing Warrant Levels.

At this time, the HCA has determined that the VA leasing warrant levels are to be equivalent to those established in section [501.603](#) of the GSAM. The below table indicates the VALCP leasing warrant levels, thresholds, and certification and experience requirements.

Warrant Level	Warrant Thresholds*	Certification Requirements	Experience**
Basic Warrant	Up to \$25,000 total contract value	LCP Level I	At least 1 year of current (within the last 3 years) contracting experience with progressively broader assignments
Level I - Simplified Warrant	Up to the Simplified Lease Acquisition Threshold (SLAT) in net average annual Rent	LCP Level I	At least 2 years of current (within last 5 years) contracting experience with progressively broader assignments
Level II - Intermediate Warrant	Up to and including \$10M total contract value	LCP Level II	At least 3 years of current (within the last 7 years) contracting experience with progressively broader assignments
Level III - Unlimited Warrant	Above \$10M total contract value	LCP Level III	At least 4 years of current (within the last 10 years) contracting experience with progressively broader assignments

*Notes on warrant thresholds:

- SLAT Warrant Procurement Limit. Lease procurement awards using a Simplified warrant shall not exceed a total lease contract value listed in [GSAM 501.603-1 \(5\) \(iv\)](#).
- The current simplified lease acquisition threshold can be found in [FAR 2.101](#) and is applicable to leasing through [GSAM 570.102](#).
- Net average annual rent includes any amortized tenant improvements and includes the net average annual rent of lease contract option periods, but excludes operating expenses (Lines 5-27 on GSA Form 1217).
- VA's definition of "Total lease contract value" (TLCV) means the entire lease award amount at initial award, including the dollar value of option periods plus any lump-sum and/or amortized tenant improvement costs reflected in the rent schedule. Lump-sum tenant improvement costs based on allowances and definitized post-award/post-design are computed based on the lease ABOA SF and allowance value.¹

**Notes on experience requirement:

Per GSAM 501.603-1 (a), "Contracting experience" means personal and substantial involvement in purchasing, renting, leasing, or otherwise obtaining goods or services from federal and non-federal sources and includes any of the following functions: preparing and issuing purchase orders, including issuing requests for quotations or solicitations, evaluating bids or proposals, selecting sources, price/cost analysis, participating in price negotiations, and contract award and administration.

¹ See [VA Supplement to the GSA Leasing Desk Guide, Appendix J, Class Deviation from General Services Acquisition Manual for Lease Amendment and Total Lease Contract Value Definitions with Examples](#)

c. **VA Lease Contracting Officer Warrant Issuance and Responsibilities.**

(1) **VA Lease Contracting Officer Warrant Board (LCOWB).** The LCOWB reviews VA leasing warrant applications, requests for increases in level for existing leasing warrants, and warrant terminations, on behalf of the HCA. The LCOWB shall be comprised of the following positions:

- i. Chairperson, GS-15 grade level or above. This position shall be held by ORP's Director of Policy and Programs (PnP) or their designee.
- ii. Supervisor. The candidate's immediate supervisor or the individual acting in the role shall serve as a voting member of the LCOWB.
- iii. A representative from the Office of General Counsel (OGC) Real Property Law Group (RPLG), voting member.
- iv. One additional individual with the following qualifications to be selected by the Director of Policy and Programs (PnP) as a voting member:
 - (a) A senior contracting officer, procurement policy analyst or subject matter expert with knowledge and experience to evaluate the candidate's competency to hold the requested warrant.
- v. Representatives from Human Resources and/or OGC shall serve as a nonvoting advisory member for boards considering the reduction, suspension, or termination of a warranted contracting officer's appointment. See paragraph d(2)(ii) below.
- vi. VALCP Program Manager shall act as Secretary to the LCOWB and is a nonvoting member.

Board members cannot serve in multiple roles (e.g., serve as LCOWB Chair and Supervisor).

(2) **Warrant Requests.** At the invitation of their immediate supervisor, the candidate will submit a warrant application package via the VALCP SharePoint site. The immediate supervisor shall ensure that the warrant application package is properly completed. The candidate will then submit their package to the VALCP program via the SharePoint site to initiate a review of that candidate's qualifications and ability to receive the requested appointment. Reviews of any candidate's package will be limited to two reviews by VALCP before rejection. The warrant application package shall consist of the following (templates available on the [VALCP SharePoint site](#)).

- i. Leasing Warrant Request Memo fully executed by the candidate's supervisory chain.

- ii. Copy of LCP certificate equal to or greater than the warrant level being requested, and previous LCO warrant certificates from another federal agency, if applicable.
- iii. [GSA Form 3409, Personal Qualifications Statement for Appointment as Contracting Officer](#), listing of work experience commensurate to the warrant level requested and addressing contracting officer qualifications (COQs) listed in Attachment C.
- iv. [Continuation Page to Form 3409](#), providing additional writing space so that the LCO qualifications can be addressed in full.
- v. [GSA Form 3410, Request for Review, Approval and Appointment](#), identifying workload requirements and justifying the need for the warrant type and level being requested.
- vi. Three (3) samples of lease documentation, executed within the last two (2) years of the date of request, that demonstrate the candidate's work as an unwarranted leasing professional or as a warranted LCO at their current level of appointment. If the sample lease documents are not executed by the candidate as the LCO of record, the candidate MUST include an explanation submitted as an attachment to their Form 3409, describing the work they performed on the subject lease, and have the LCO of record countersign.

(3) Warrant Review.

- i. The Chairperson, LCOWB, shall convene a LCOWB to review incoming candidate applications. The LCOWB will review the application packages to ensure that all of the applicable criteria have been met and to ensure the candidate meets the organization's needs for contracting authority and possess the experience, qualifications, and business acumen to execute their assigned duties prior to recommending any contracting officer warrant. The LCOWB review shall consist of three phases:
 - (a) Educational Review: A review of the candidate's fulfillment of the educational and training requirements for the requested appointment in accordance with the Leasing Certification Program requirements established through the [GSA Memorandum SPE-2021-06](#).
 - (b) Performance Review: An informal audit of the candidate's submitted lease files.
 - (c) LCOWB Interview: An interview with the candidate and the warrant board. During this interview, the candidate will be asked questions to demonstrate their knowledge of lease acquisition procedures and their ability to exercise judgement on discretionary matters consistent with the requested level of appointment.

- ii. Following the LCOWB's review of the candidate's qualifications, the board will take a vote to approve or disapprove the candidate for a warrant. Unanimous approval from board members is required for the candidate to obtain a warrant.
- iii. The LCOWB Chairperson will submit the board's recommendation to the HCA using the [GSA Form 3410, Request for Review, Approval and Appointment](#). In recommending disapproval of a candidate, the LCOWB Chairperson will document a justification for the Board's recommended action.

(4) VA Leasing Warrant Appointment.

- i. Once the warrant application is recommended for approval by the LCOWB, the Associate Executive Director, ORP, as the HCA for Leasing, will review the Board's recommendation, and within 10 business days of receipt, the HCA may concur with the recommendation or may take an alternative action, at their sole discretion. All HCA decisions are final.
- ii. The HCA shall appoint LCOs using the [SF-1402, Certificate of Appointment](#), and specify any limitation on the scope of authority, other than limitations contained in applicable laws or regulations (e.g., type of contract, prospectus limitations, or dollar threshold).
- iii. The leasing warrant scope will define the lease award and administration thresholds in accordance with the warrant level. Leasing warrants shall have no geographical restrictions; however, warrants are not transferrable across VA administrations. LCOs that transfer to a new contracting activity must reapply for a warrant. Leasing warrants are specific to leasing contract actions for real property and may not be used for other contracting actions, such as goods and services.
- iv. Candidates are appointed for either an interim or permanent term. Interim appointments are for a specified period of time. Personnel who hold interim Warrants must complete all training required for a permanent warrant within 1 year of the interim appointment per the expiration date annotated on the warrant certificate. A permanent appointment may be made when a candidate meets all requirements for experience, education, and training at the time the appointment is made.

- (5) Warrant Maintenance.** To retain warrants, LCOs must hold the appropriate leasing certification, which includes completing 100 CLPs every two years. Failure to do so will result in suspension and/or termination of warrant.

- (6) **Name Changes.** When a warranted employee's name is legally changed, the employee must update their profile in CSOD and notify VALCP of the name change so their warrant certificate may be updated to reflect their new legal name. Name changes will be processed administratively and will not be required to be reviewed by the LCOWB.

d. **VA Leasing Warrant Termination.**

- (1) **Administrative Concerns.** If an LCO warrant is no longer required for administrative reasons such as retirement, resignation, reassignment, or when the appointment is otherwise no longer required (e.g., reduction in volume of actions, work complexity, or change in organizational structure that eliminates the need for a warranted LCO), the LCO's supervisory chain of command must request termination of their leasing warrant within 14 calendar days of the LCO's departure from their position. A leasing warrant may also be suspended or terminated if the LCO fails to maintain the appropriate LCP certification. Such terminations shall not be referred to the LCOWB but processed as routine administrative actions by the VALCP Program Manager.
- (2) **Performance Concerns.** A leasing warrant may also be terminated due to performance concerns. Such request may come from the LCO's supervisory chain or may be the result of negative audit findings or other performance related actions that give rise to a concern about the LCO's ability to carry out their duties consistent with their level of appointment. The Chairperson shall convene a LCOWB for purposes of reviewing a request for termination of a warrant for performance concerns.
- i. The LCOWB is non-disciplinary and does not have the authority to execute or order the execution of adverse personnel actions. Disciplinary actions and/or conduct-related concerns remain the sole responsibility of the individual's supervisory chain. The LCOWB shall conduct their review solely with regards to performance of LCO responsibilities.
 - ii. The LCOWB Chairperson shall convene a LCOWB consisting of the structure described in paragraph 3(c)(1). The HCA shall request specialized representation from Human Resources and/or the Office of General Counsel when considering terminations due to an LCO's performance (see paragraph 3(c)(1)(v)). The LCOWB shall utilize a fact-based approach to reviewing the LCO's performance on the matter(s) of concern and submit a recommendation to the HCA. The LCOWB's decision shall fall into the following categories:
 - (a) **Suspension Subject to Successful Completion of Additional Education/Training** – The board shall consider if additional training can be used to raise the appointee's performance to the required level. The LCOWB may recommend training to address

- specific concerns in the appointee's knowledge, skills, and abilities. This training may involve remedial training or new training opportunities. The LCOWB can recommend that the appointee's warrant be suspended until such time that the recommended training is completed.
- (b) Reduction of Warrant Level – The LCOWB can recommend that an appointee's warrant level is reduced to a lower level to allow the candidate to further develop at a level more consistent with their current abilities.
 - (c) Termination of Warrant – The LCOWB can recommend that the individual's appointment as a warranted lease contracting officer is terminated. This action shall be used when the appointee's performance demonstrates a lack of judgement or fundamental knowledge in the execution of lease acquisition.
 - (d) The Board can recommend no action.
- iii. Every attempt must be made to complete this review and convene the LCOWB within 45 calendar days of receipt of a request for termination due to performance concerns. In the event this timeline cannot be met, the VALCP Program Manager shall notify the candidate and the candidate's supervisory chain of command of the new timeline. While the request for termination is being reviewed, the LCO's supervisory chain of command has the authority to suspend the warrant pending the outcome of the LCOWB and the HCA final decision.
 - iv. Following the LCOWB's review of the LCO's performance, the chairperson of the LCOWB will submit a recommendation to the HCA. In their recommendation the LCOWB chairperson will document the efforts taken to ascertain the candidate's performance and a justification for the recommended action.
 - v. Within 14 calendar days of receiving the Board's recommendation, the HCA may concur with the chair's recommendation or may take an alternative action, at their sole discretion. All HCA Decisions are final.
 - vi. LCO warrants that were terminated for either administrative or performance reasons cannot be reinstated. Leasing Specialists who formerly held an LCO warrant that was terminated must reapply.

4. RESPONSIBILITIES.

- a. **ORP.** ORP is responsible for updating this policy and for administering the VALCP. ORP is responsible for overseeing completion of required training and issuing leasing certifications and warrants. ORP is responsible for fielding questions and offering support and guidance to all VA administrations with respect to the VALCP.

- b. **VHA, NCA, and VBA.** Administrations are responsible for maintaining current employee information in FAI CSOD, for submitting leasing certification requests and warrant nominations in conformance with this policy, and for notifying ORP when warrants are to be terminated or have been suspended.

5. DEFINITIONS.

- a. **Contracting Officer Qualifications (COQs).** Minimum experience requirements as a Contracting Specialist or warranted Contracting Officer for appointment at a specific warrant level.
- b. **Head of Contracting Activity (HCA) for Leasing.** The senior VA official with full management authority for Departmental Real Property Leasing Activities. The Executive Director, Office of Construction and Facilities Management holds this position, unless otherwise delegated. The Associate Executive Director of ORP currently holds this position for the VA under delegation of authority from ED, CFM.
- c. **Lease Contracting Officer (LCO).** An individual holding a valid Government warrant providing authority to enter into and administer leases on the Government's behalf.
- d. **Lease Contracting Officer Warrant Board (LCOWB).** A designated group of VA employees appointed by the HCA for Leasing who receive, evaluate, and process requests for selection and nomination of lease contracting officers at the basic, simplified acquisition, intermediate, and senior levels.

6. REFERENCES.

- a. [38 U.S.C. § 312\(a\), Director of Construction and Facilities Management](#)
- b. [GSA Bulletin Federal Management Regulation \(FMR\) C-2, Delegations of Lease Acquisition Authority](#)
- c. [GSA Memorandum SPE-2021-06, Updates to GSA Leasing Certification Program, January 27, 2021](#)
- d. GSA Acquisition Manual (GSAM) Sections [501.601](#) and [501.603](#)
- e. Delegation of Authority for Head of Contracting Activity, current version available at [VA Leasing Certification Program - VALCP Policy Library - All Documents \(sharepoint.com\)](#)
- f. [VA Supplement to the GSA Leasing Desk Guide, Appendix J, Class Deviation from General Services Acquisition Manual for Lease Amendment and Total Lease Contract Value Definitions with Examples](#)



GSA Office of Governmentwide Policy

SPE Memorandum SPE-2021-06
January 27, 2021**MEMORANDUM FOR PBS HEADS OF CONTRACTING ACTIVITY**

FROM: JEFFREY A. KOSES
SENIOR PROCUREMENT EXECUTIVE

DocuSigned by:

Jeffrey Koses

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JOHN THOMAS
ACTING ASSISTANT COMMISSIONER, PBS OFFICE
OF LEASING

DocuSigned by:

John Thomas

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SUBJECT: Updates to GSA Leasing Certification Program

I. BACKGROUND

The purpose of this memorandum is to update the General Services Administration (GSA) Leasing Certification Program (LCP) curriculum.

In October 2014, the Office of Federal Procurement Policy (OFPP) required all contracting professionals to obtain the Federal Acquisition Certification in Contracting (FAC-C). Under the authority of the Senior Procurement Executive (SPE), a GSA tailored certification program specifically for Leasing Contracting Officers (LCOs) was determined to be more applicable. GSA implemented the "Leasing Certification Program (LCP)" tailored around the leasing of real property as an alternative to the FAC-C. The GSA-developed program leveraged current leasing training requirements along with selected project management and acquisition training for Leasing Contracting Officers. GSA's Contracting Officer Warrant Program requires completion of the LCP for warrant issuance to LCOs.

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In February 2020, the GSA Acquisition Workforce Division and PBS Office of Leasing reviewed the curriculum and identified updates based on current business practice and needs. The updated curriculum is consistent with LCP competency requirements, provides broader options for learning materials, and reflects current needs for the program.

II. APPLICABILITY

- Existing certifications remain valid.
- Employees who will complete an existing certification prior to October 1, 2021, should continue on the current path.
- Employees who will not complete the current certification by October 1, 2021, should follow the new curriculum.
- The updated curriculum applies to new certifications issued on or after October 1, 2021.

a. GSA personnel - The updated GSA LCP curriculum becomes effective October 1, 2021, and applies prospectively to all GSA Leasing Contracting Officers (LCOs), regardless of job series.

b. Non-GSA personnel - Federal agencies that are relying upon a GSA delegation of authority for leasing are also subject to this policy. In accordance with GSA FMR Bulletin C-2 (79 FR 21464), Delegations of Lease Acquisition Authority, paragraph 4(c):

"The authority to lease granted by a delegation may only be exercised by a warranted realty contracting officer fully meeting the experience and training requirements of the Contracting Officer Warrant Program, as specified in section 501.603 of the General Services Administration Acquisition Manual (GSAM) and further revised ... from time to time."

III. POLICY

A. Education:

The education requirement remains a baccalaureate degree **or** 24 semester hours of business credits.

B. Experience:

Real property leasing experience must be commensurate with the GS-1170 qualifications standard. See the Attachments for further details.

C. Training:

See the Attachments for details on the updated training requirements. Most notably, the Federal Acquisition Certification for Contracting Officer Representatives (FAC-COR) is no longer required. These courses have been removed and replaced with training that focuses on Program/Project Management.

The same training may not be used to satisfy multiple requirements (e.g. a course used to satisfy requirements for Level I may not be used to satisfy requirements for Level II or Level III).

For GSA: Any course substitution/equivalency request must be approved **IN ADVANCE** by the leasing [acquisition career management staff](#) and the Office of Leasing.

D. Continuous Learning:

The requirement to attain 80 Continuous Learning Points (CLPs) every two years remains unchanged and is still applicable for all LCP certification holders. Mandatory training may also be required as part of continuous learning. For the current mandatory training list, please contact the Office of Leasing, [LCP Program Manager](#).

For GSA: See the [Continuous Learning page](#) on the Acquisition Portal for guidance on obtaining CLPs.

E. Waivers:

Waivers for the LCP certification will only be granted in exceptional and compelling circumstances.

For GSA: The Head of the Contracting Activity (HCA) must provide a written justification, including the reason for and proposed conditions of the waiver and a plan to complete the requirements, through the Office of Leasing and the Acquisition Career Manager (ACM) to the SPE. The SPE holds sole discretion on whether to grant the waiver and its conditions.

IV. CANCELLATION

This memorandum cancels and replaces SPE memorandum 2015-09-25.

IV. POINTS OF CONTACT

For GSA: Questions regarding this memorandum may be directed to leasing@gsa.gov.

For Delegated Agencies: Questions regarding this memorandum may be directed to lcp-delegatedagency@gsa.gov.

Attachments

Attachment A – Frequently Asked Questions

Attachment B – Leasing Certification Program – Overview

Attachment C – Leasing Certification Program – Level I Details

Attachment D – Leasing Certification Program – Level II Details

Attachment E – Leasing Certification Program – Level III Details

Attachment A – Frequently Asked Questions (FAQs)

1. How will these changes impact current LCP certification holders?

The curriculum changes will prospectively apply to new certification applicants. If you currently hold an LCP certification, you will only be subject to the new curriculum changes if you seek a higher level LCP certification after October 1, 2021. Otherwise, we advise that you continue to obtain 80 CLPs every two years in order to keep your certification current, including completing any mandatory training courses.

2. Will I have to start over if I'm in the process of completing the training for a certification on October 1, 2021?

GSA will accept certification requests based upon completion of the legacy curriculum until March 31, 2022 to allow sufficient time for transition.

3. How will these changes impact my warrant?

The curriculum changes will not impact the warrants of current LCOs who hold active certifications in good standing.

4. Will the warrant thresholds change?

This policy does not change leasing warrant thresholds.

5. How will the career management system of record be used to support the Leasing Certification Program?

The LCP curriculum will be updated in the career management system of record, such as the Federal Acquisition Institute Training Application System (FAITAS), FAI Cornerstone OnDemand (CSOD) or a successor system. Please note that the course numbers identified in the Attachments

may change and updates will be shared via the Acquisition Portal, the [Office of Leasing Training Webpage](#) and external GSA websites.

For GSA: The legacy curriculum will be available for viewing on the Acquisition Portal for a short period following the transition on October 1, 2021.

6. I already have a FAC P/PM certification. Should I re-take the Project Management training in the LCP curriculum?

If you already have a FAC P/PM certification in good standing and are working toward an LCP certification, you are exempt from taking the project management training at the commensurate level. This exemption particularly applies to those who attained the FAC-P/PM through a legacy curriculum.

7. Where can I go for additional information?

For GSA: For additional information, including the GSA Guide to the Leasing Certification Program and other implementation details, please visit the Acquisition Portal and the Office of [Leasing Training Webpage](#). You can also contact your leasing [acquisition career management staff](#).

For Delegated Agencies: For additional information, including an ACM Guide to the Leasing Certification Program and other implementation details, please visit the external GSA website at <https://www.gsa.gov/policy-regulations/policy/acquisition-policy/office-of-acquisition-policy/gsa-real-property-leasing-certification-program>. You can also contact lcp-delegatedagency@gsa.gov.

Attachment B – Leasing Certification Program – Overview

Legacy LCP Requirements				
Training	I	II	III	Total
FAC-COR Certification	10	40	*	50
Leasing	82.5	96.5	62 – 72	241 – 251
Project Management	24	24	32	80
Acquisition	33.5	49 – 57	0	82.5 – 90.5
Professional Skills	2	16	44	62
Total	152	225.5 – 233.5	138 – 148	515.5 – 533.5

* A current Level II FAC-COR Certification or higher is required.

New LCP Requirements, Effective 10/1/2021				
Training	I	II	III	Total
FAC-COR Certification	N/A	N/A	N/A	0
Leasing	76	96	64	236
Project	82 - 96	92 - 96	0	174 - 192

Managem ent				
Acquisition	15.5	18	0	33.5
Professiona l Skills	0	16	44	60
Total	173.5 - 187.5	222 - 226	108	503.5 - 521.5

In addition, previous education and experience requirements for each level remain in effect.

Attachment C – Leasing Certification Program – Level I Details

GSA Leasing Certification Program (LCP) Level I			
Prerequisites	N/A		
Other Certification Requirement	FAC P/PM Certification is not required but is recommended.	Training Hours	Delivery Method
Leasing	FCN 406 Lease Acquisition Training (LAT)	36	Instructor-led
	FCN 407 Real Estate Law or FCN 411 Federal Real Property Lease Law	40	Instructor-led
Project Management*	FAC P/PM Training 130 Suite: <ul style="list-style-type: none"> ● FPM 131 Fundamentals of Project & Program Management (32 CLPs) ● FPM 132 Fundamentals of Contracting (24 CLPs) ● FPM 133 Fundamentals of Business, Cost, Financial Management (24 CLPs) ● FPM 134 Fundamentals of Leading Projects and Programs (16 CLPs) <p style="text-align: center;">- or -</p>	96	Online and/or Instructor-led
	FAC P/PM Training 120 Suite:	82	

	<ul style="list-style-type: none"> ● FPM 120 Acquisition Fundamentals of Project and PM (40 CLPs) ● FPM 120A Project Management Basics (20 CLPs) ● FPM 120B Project Management and Project Lifecycle (22 CLPs) <p>Note: Although the FAI refers to FPM 120A, FPM 120B, and FPM 121 as the Entry Level Training track, PBS requires applicants to complete FPM 101, FPM 132, FPM 103, and FPM 134. (FPM 101 and FPM 103 are in-house training deliveries, tailored to the PBS acquisition workforce.)</p>		
Acquisition	CLM 003 Overview of Acquisition Ethics	2	Online
	FAC 043 Ethics and Procurement Online Integrity for the Acquisition Workforce	1	Online
	FAC 031 Small Business Programs	2.5	Online
	HBS 428 Negotiating	2	Online
	CLC 047 Contract Negotiation Techniques	2	Online
	FAC 038 How to Integrate Green into Procurement	2	Online
	CLC 004 Market Research	3	Online

	CLC 065 Suspension and Debarment	1	Online
	LCP TOTAL	173.5 - 187.5 hrs <i>(approximately 13 Instructor-led days)</i>	
Education	Baccalaureate degree from an accredited institution or 24 semester hours of business credits.		
Experience	One year of real property leasing experience commensurate with the GS-1170 qualifications standard.		

** If you already have a FAC P/PM certification in good standing and are working toward an LCP certification, you are exempt from taking the project management training at the commensurate level. This exemption particularly applies to those who attained the FAC P/PM through a legacy curriculum.*

Attachment D – Leasing Certification Program – Level II Details

GSA Leasing Certification Program (LCP) Level II			
Prerequisites	To apply for LCP Level II, personnel must have a current LCP Level I Certification		
Other Certification Requirement	FAC P/PM Certification is not required but is recommended.	Training Hours	Delivery Method
Leasing	FCN 408 Cost and Price Analysis of Lease Proposals	40	Instructor-led
	FCN 409 Techniques of Negotiating Real Property Leases	40	Instructor-led
	Training on Construction Fundamentals**	16	As Applicable
Project Management *	FAC P/PM Training 230 Suite: <ul style="list-style-type: none"> ● FPM 231 Applications in Project Management (32 CLPs) ● FPM 232 Applications in Contracting (24CLPs) ● FPM 233 Applications in Business, Cost, Financial Management (24 CLPs) ● FPM 234 Applied Leadership in Project and Program Management (16 CLPs) <p style="text-align: center;">- or -</p> FAC P/PM Training 330 Suite:	96	Online and/or Instructor-led

	<ul style="list-style-type: none"> ● FPM 331 Progressive Concepts in Program Management (32 CLPs) ● FPM 332 Progressive Contracting Strategies for Programs (24 CLPs) ● FPM 333 Progressive Business Cost & Financial Management (24 CLPs) ● FPM 334 Progressive Leadership in Program Management (16 CLPs) <p style="text-align: center;">- or -</p> <p>FAC P/PM Training 370 Suite:</p> <ul style="list-style-type: none"> ● FPM 370 FAC P/PM Senior Level Introduction (2 CLPs) ● FPM 371 FAC P/PM Senior Level Pre-Course Event (10 CLPs) ● FPM 372 FAC P/PM Senior Level Resident Course (80 CLPs) <p>Note: Although FAI identifies FPM 331, 332, 333, and 334 as the Senior Level Training track, PBS recommends applicants complete the in-house training series FPM 370 and FPM 372 which can be taken in lieu of FAI’s suggested training.</p>	<p style="text-align: center;">96</p> <p style="text-align: center;">92</p>	
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Acquisition	FFM BP3 or FFM 406 Federal Budgeting Fundamentals	16	Instructor-led
	HBS 426 Marketing Essentials	2	Online
Professional Skills	Training on Leadership**	16	As Applicable
	LCP TOTAL	222 - 226 hrs (approximately 15 Instructor-led days)	
Education	Baccalaureate degree from an accredited institution or 24 semester hours of business credits.		
Experience	Two years of real property leasing experience commensurate with the GS-1170 qualifications standard.		

** If you already have a FAC P/PM certification in good standing and are working toward an LCP certification, you are exempt from taking the project management training at the commensurate level. This exemption particularly applies to those who attained the FAC P/PM through a legacy curriculum.*

*** Where the term "Training on ..." is used in the updated curriculum, the workforce member has discretion to complete any training course, in the specified competency, offered by a College/University or recognized educational institution or academic provider that meets or exceeds required training hours.*

*** For GSA: **Before pursuing a learning opportunity**, such as publications, events or experiential learning, to meet the hourly requirement for this topic, please contact your leasing [acquisition career management staff](#) to ensure that the LCP curriculum requirements will be met. If you complete the learning opportunities without obtaining pre-approval, your certification request may be denied for failure to complete the curriculum*

requirements. For more information on the various options for earning CLPs, please refer to [the Acquisition Portal](#).

Attachment E – Leasing Certification Program – Level III Details

GSA Leasing Certification Program (LCP) Level III			
Prerequisites	To apply for LCP Level III, personnel must have a current LCP Level II Certification.		
Other Certification Requirement	FAC-PPM Certification is not required but is recommended.	Training Hours	Delivery Method
Leasing	FCN 410 Real Estate Appraisal Principles	32	Instructor-led
	Training on Construction Fundamentals*	8	As Applicable
	Any Real Estate Finance and Marketing course offered by a College/University or recognized educational institution or academic provider that meets or exceeds required training hours	24	As Applicable
Professional Skills	Training on Leadership Development*	32	As Applicable
	CLC 045 Partnering	2	Online
	HBS 424 Leading and Motivating	2	Online
	CLC 044 Alternative Dispute Resolution	4	Online
	HBS 440 Team Leadership	2	Online
	HBS 407 Crisis Management	2	Online

	LCP TOTAL	108 Hours (approximately 7.5 Instructor-led days)
Education	Baccalaureate degree from an accredited institution or 24 semester hours of business credits.	
Experience	Four years of real property leasing experience commensurate with the GS-1170 qualifications standard.	

** If you already have a FAC P/PM certification in good standing and are working toward an LCP certification, you are exempt from taking the project management training at the commensurate level. This exemption particularly applies to those who attained the FAC P/PM through a legacy curriculum.*

*** Where the term "Training on ..." is used in the updated curriculum, the workforce member has discretion to complete any training course, in the specified competency, offered by a College/University or recognized educational institution or academic provider that meets or exceeds required training hours.*

*** For GSA: **Before pursuing a learning opportunity**, such as publications, events or experiential learning, to meet the hourly requirement for this topic, please contact your leasing [acquisition career management staff](#) to ensure that the LCP curriculum requirements will be met. If you complete the learning opportunities without obtaining pre-approval, your certification request may be denied for failure to complete the curriculum requirements.*

Attachment C: Contracting Officer Qualifications Statement (COQS)

A combination of these factors will be considered in the review of warrant applications.

Basic Experience Requirements

- At least 1 year of current (within last 3 years) contracting experience with progressively broader assignments in at least three (3) of the following requirements:
 - eCMS File Management
 - SAM.gov/ Advertisement / Expressions of Interest
 - Market Survey Participation
 - Evaluating Bids/Proposals
 - Site Inspection/Acceptance of Space

Level I Experience Requirements

- At least 2 years of current (within last 5 years) contracting experience with progressively broader assignments in all of the following requirements:
 - eCMS File Management
 - SAM.gov/ Advertisement / Expressions of Interest
 - Market Survey Participation
 - Evaluating Bids/Proposals
 - Site Inspection/Acceptance of Space

Level II Experience Requirements

- Meet Level I experience requirements
- At least 3 years of current (within the last 7 years) contracting experience with progressively broader assignments
- Award of a lease at the Simplified Acquisition Threshold
- Negotiation or lease administration experience for a lease at the Level II Threshold
- Requirements development for tenant improvements above the Level I Threshold OR project management experience of tenant improvement build-out above the Level I Threshold

Level III Experience Requirements

- Meet Level II experience requirements
- At least 4 years of current (within the last 10 years) contracting experience with progressively broader assignments

- Award of a lease at the Level II Threshold
- Negotiation or lease administration experience for a prospectus level lease.
- Requirements development for tenant improvements above the Level II Threshold OR project management experience of tenant improvement build-out above the Level II Threshold
- Experience and/or knowledge of the VA Request for Lease Proposals (VARLP) process for prospectus level leases