

Date: March 8, 2018

From: Acting Deputy Senior Procurement Executive

Subj: Class Deviation to Veterans Affairs Acquisition Regulation (VAAR) 807.105-70,
Written Acquisition Plans (VAIQ 7815846)

To: VA Heads of Contracting Activities

1. **Purpose:** The purpose of this Class Deviation is to establish policy, thresholds, and acquisition plan approval requirements for written Acquisition Plans. The threshold for written acquisition plans required by FAR 7.105 is increased from \$1 million to \$7 million, notwithstanding streamlined versions of acquisition plans deemed required in FAR 7.103(e), 7.105, 7.107, and/or as required by the Head of the Contracting Activity (HCA). This Class Deviation rescinds Attachment 5 only, titled, "Part 807 — Acquisition Planning," in VA Procurement Policy Memorandum (PPM) 2016-09, "*Rescission of the 1997 Non-codified Material (Formerly the 1997 Veterans Affairs Acquisition Regulation (VAAR))*," dated September 30, 2016.

2. **FAR and VAAR Sections Impacted:** FAR 7.102, 7.103(e), 7.105, 7.107, and VAAR 807.105-70(new).

3. **Effective Date:** Immediately.

4. **Expiration Date:** Effective until incorporated into the revised VAAR or VA Acquisition Manual (VAAM) or rescinded.

5. **Acquisition plan applicability:** This class deviation acquisition plan applies to all VA contracting activities.

6. **Exception:** None.

7. **Background:** As part of VA's efforts to streamline the acquisition process and to reduce unnecessary workload burdens, it has been determined that the threshold for requiring the preparation of a written acquisition plan, as required in FAR 7.105, should be increased from \$1 million to \$7 million, notwithstanding streamlined versions of acquisition plans deemed required in FAR 7.103(e), 7.105, 7.107, and/or as required by the HCA. Increasing the threshold required to submit an acquisition plan would significantly reduce the time required to make an award, while not having a negative impact to the VA mission. Although VAAR subpart 807.105 was considered "non-codified" and "unnumbered" guidance in PPM 2016-09, this Class Deviation now adds the necessary language to VAAR as 807.105-70 to establish policy for written acquisition plans.

a. **Current Non-codified, Unnumbered VAAR ::807.105 Guidance:** The current guidance for “Contents of written acquisition plans,” issued as a part of PPM 2016-09, requires a written acquisition plan for each acquisition anticipated to cost in excess of \$1,000,000.

b. **Need for Deviation from Unnumbered VAAR ::807.105 Guidance:** An increase to the acquisition plan threshold will implement streamlined efforts in the VA’s acquisition process and reduce unnecessary workload burdens.

c. **New Policy:** The threshold for requiring the preparation of a written acquisition plan is increased from \$1 million to \$7 million, notwithstanding streamlined acquisition plan’s required in FAR 7.102, 7.103(e), 7.107, and as required by the HCA. Additional language is added to establish policy, threshold, and approval requirements.

8. **Questions or Concerns:** Please direct questions regarding this PPM to the Office of Acquisition and Logistics (003A), Procurement Policy and Warrant Management Service (003A2A), via email at VA.Procurement.Policy@va.gov or (202) 632-5288.

/s/

Thomas A. Burgess

Attachment: Class Deviation from VAAR Subpart 807.105.

Class Deviation
Department of Veterans Affairs Acquisition Regulation
807.105-70, Written Acquisition Plans

807.105-70, Written acquisition plans.

(a) *Policy.* In accordance with FAR 7.102, the VA will perform acquisition planning and conduct market research for all acquisitions. The extent and nature of the acquisition planning documentation and the market research conducted will vary depending on complexity, urgency, estimated dollar value, etc.

(b) *Thresholds.* Written acquisition plans should address, at a minimum, those items as prescribed in FAR 7.105, as required, in accordance with the following thresholds:

(1) Written acquisition plans are required at or above \$7 million. The Head of the Contracting Activity (HCA) may require completion of acquisition plans, to include use of streamlined formats, below \$7 million, when required due to unique or high-level interest or complexity. Irrespective of the requirement for a written acquisition plan, contracting officers and acquisition planners are required to perform acquisition planning and conducting market research in accordance with FAR 7.102. Certain key information, such as contract type, milestone schedule, sources, government furnished information, government furnished property, and security, among other key FAR 7.105 considerations, must be appropriately considered and documented in the file.

(2) Written acquisition plans shall be accomplished for all cost-reimbursement and other high-risk contracts (to include time-and-materials/labor hour type contracts) in accordance with FAR 7.103(e), at any dollar value.

(c) *Acquisition plan approvals.* Contracting officers are also required to prepare acquisition plans and obtain required acquisition plan approvals from required offices in accordance with HCA procedures, e.g., for items involving Information Technology (IT) or IT-related, contract bundling, consolidation, interagency agreements.
