

To: VA LCOs and Staff

Subject: FW: OCFM ORP VA-Wide Leasing Policy Alert 2024-03: VA Specific Instructions for GSAM Threshold Changes to Lease Acquisition Plans & Justifications

Date: Thursday, December 28, 2023 2:01:45 PM

Attachments: [image001.png](#)
[EXTERNAL GSAM Threshold Changes to Lease Acquisition Plans Justifications.msg](#)
[Requirements by Lease action Nov 2023.pdf](#)
[image002.png](#)

Good afternoon!

General Services Administration (GSA) issued [GSAM Change 170 \(case 2023-G510\)](#) effective October 6, 2023, which changed the review and approval thresholds for Acquisition Plans and Justifications for Other than Full and Open Competition. The change also established the role of a Contracting Executive.

GSA's Office of Leasing subsequently updated guidance for seeking delegations of authority effective October 12, 2023, with a notification to delegated agencies on November 9, 2023, per the 1st attachment.

This policy alert provides a summary of the key changes affecting lease procurements along with VA specific implementation instructions; however, please take a few moments to read through the summary of key GSAM updates to familiarize yourself with all of the new changes.

Summary of key GSAM updates:

1. **Revises approval thresholds for Justification for Other than Full and Open Competition (JOTFOC) per [GSAM 506.304\(e\)](#) as follows:**

(e) Approval Thresholds. The following are the minimum approval requirements for justifications. The HCA may further limit approval authority for designated officials or impose lower thresholds. Thresholds include all options.

Threshold	Approving Official
Up to but not exceeding \$750K	Contracting Officer
Over \$750K to \$75M	HCA or Contracting Executive, if applicable
Over \$75M	GSA SPE

Note: Per the 1st attachment, GSA's Office of Leasing is maintaining the SLAT threshold for JOTFOCs as stated under GSAM 570 which means actions under SLAT, regardless of their TLCV, only require the LCO to document the rationale for limiting competition and do not require preparation of a formal JOTFOC or higher-level approvals.

2. **Revises Acquisition Plan (AP) approval thresholds per [GSAM 507.103\(b\)](#)**

as follows:


(b) Approval thresholds. (1) The following are the dollar value thresholds and the level of the approving official for approving acquisition plans or waiving written acquisition plans. The HCA may further limit approval authority for the approving officials. Thresholds include all options.

Threshold	Approving Official
Up to but not exceeding \$5M	Contracting Officer
Over \$5M to \$15M	One Level above the Contracting Officer
Over \$15M to \$75M	Contracting Director
Over \$75M	HCA or Contracting Executive, if applicable

3. **Establishes the role of a Contracting Executive, an individual above the GS-15 level, that may be designated by the HCA to carry out various contracting functions if the HCA determines such a position would be beneficial.**

- As a result of the above change, various subparts were updated including but not limited to GSAM 501.4, 501.6, 501.7, 506.3 and 507.1.

Summary of delegation changes:

4. **Refer to the  GREX Delegation Request Matrix, which provides a list of documents required per action for general guidance.**

- Please note OAEM and CFM ORP are obtaining clarification from GSA on the following and will provide an update when available:
 - If the approval levels will be retroactive, possibly resulting in the need for revised JOTFOC or AP's approved October 6 to present.
 - Review of listed requirements which do not align with GSAM requirements.

VA Specific Instructions: For VA's real property lease procurements, the changes will be implemented as follows:

1. **JOTFOC Threshold and Approvals:**

Threshold	Approving Official
Up to but not exceeding \$750K*	Contracting Officer

Over \$750K to \$75M	HCA for Leasing
Over \$75M	HCA for Leasing

* JOTFOCs are not required for non-competitive SLAT lease procurements regardless of their TLCV, however the LCO is required to document the rationale for limiting competition using the [Lack of Competition - Memo to File \(SLAT Leases\) template](#).

2. **AP Threshold and Approvals:**

Threshold	Approving Official
Up to but not exceeding \$5M	Contracting Officer
Over \$5M to \$15M	One Level above the Contracting Officer
Over \$15M to \$75M	HCA for Leasing
Over \$75M	HCA for Leasing

3. **At this time, the role of Contracting Executive will not be established for the purposes of VA’s Real Property Lease Program.**
4. **Thresholds reflected are dependent upon the lease action type. Refer to the [HCA for Leasing Review and Approval Matrix](#) for specific actions to determine review and approval requirements.**
5. **Until further notice, VA must include the documents listed per the [GREX Delegation Request Matrix](#) in delegation request packages.**

This policy alert is effective immediately and remains in effect until further notice. The revised thresholds have been incorporated into the [HCA for Leasing Review and Approval Matrix](#).

NOTE: The “Requirements by Lease action Nov 2023” attachment from GSA has been provided for reference, however the [GREX Delegation Request Matrix](#) is the mandatory supplemented document for use by VA.

Please submit questions or concerns related to this alert to CFM ORP Policy and Programs, VACO003C7APolicyandProgramsTeam@va.gov. Please forward delegation related inquiries to [Office of Asset Enterprise Management](#).