

Federal Acquisition Certification – Contracting Officer’s Representatives (FAC-COR) Frequently Asked Questions (FAQs)

Note: These FAQs reference the Office of Federal Procurement Policy’s (OFPP’s) memorandum of September 6, 2011, [Revisions to the Federal Acquisition Certification for Contracting Officer’s Representatives \(FAC-COR\)](#).

1. *When is the FAC-COR effective?*

The FAC-COR is effective January 1, 2012. (Reference paragraph 1)

2. *Our COR program for construction and IT work is more stringent than the new requirements. Can we keep our existing requirements for assignment of CORs to contracts in these specialty areas?*

Yes, agencies may add additional training and experience requirements. The FAC-COR, however, shall be recognized by all civilian agencies as evidence that an employee meets core training and experience requirements to perform COR functions. (Reference paragraph 6.e)

3. *What activities count toward Continuous Learning Points (CLPs)?*

Additional guidance on determining continuous learning points is available on the FAI website (www.fai.gov) under the Training tab. (Reference paragraph 6.f)

4. *Can CLPs earned to maintain one FAC certification be used to maintain other certifications?*

Yes, as long as they meet acceptability standards for both.

5. *Can an agency require additional competency training before a COR assignment to a specialty contract?*

Yes, in accordance with agency procedures. (Reference paragraph 6.e)

6. *Can agencies specify what level a COR must achieve before assignment to riskier contracts?*

Yes. The COR level required for a particular acquisition shall be determined by the Contracting Officer (CO) during acquisition planning and in consultation with the Program Manager. For example, a COR assigned to major investments, as defined by Office of Management and Budget (OMB) Circular A-11 shall generally be designated as a Level III COR and must meet the new requirements within 6 months of assignment. (Reference paragraphs 6.a and d)

7. *Do CORs have to become Level I certified before becoming Level II certified?*

No, the COR levels are not incremental; however, it is strongly recommended that Level III CORs have prior certification at Level II. (Reference paragraph 6.e)

8. *Are all CORs expected to become Level III certified?*

No, the COR certification level depends on the type of contract the COR is managing and not all CORs manage the most complex and high-risk contracts. Level I COR certification, for example, is generally appropriate for low-risk contract vehicles, such as fixed-price supply contracts and orders.

9. *If a current COR meets the new requirements for certification, can he/she be automatically converted?*

Yes, in accordance with agency procedures. Absent agency action, current CORs shall be grandfathered in as Level II CORs. At its discretion, and in accordance with agency policy describing the decision process, an agency may decide to 1) grandfather some current CORs in as Level I CORs, 2) grandfather some current CORs in as Level II CORs, or 3) reassign some current CORs who meet the new requirements for Level III CORs at Level III after validating their experience and competency to the ACM or designee (Reference Section 6.b)

10. *How does an agency determine the level of risk associated with a contract to determine the COTR level necessary?*

The COR level required for a particular acquisition is determined by the CO during acquisition planning and in consultation with the Program Manager. To assist in this determination, the CO may find the COR Appointment Criteria Matrix in Attachment 3 helpful. The matrix identifies risk factors, such as complexity and contract type, for COs to consider when appointing a COR to a contract. Assessing the level of risk for each factor can help COs analyze the overall level of risk for the contract. (Reference paragraph 6.d)

11. *Why is there no grace period for Level I and Level II CORs?*

There is no grace period for Level I and II CORs because there are no additional training requirements to transition CORs from the old program to the new. (Reference Section 6.b)

12. *How soon should the new Level I and Level II CORs be appointed?*

Agencies have until the effective date of the FAC-COR (January 1, 2012) to determine if and how to reassign their current CORs. Upon being grandfathered in or reassigned, CORs will follow the continuous learning requirements for their new COR level. These transition requirements are detailed in Attachment 2. (Reference 6.b)

13. *If an individual with a COR Level II cert pursues a COR Level III, can the additional 20 hours of training be obtained from continuous learning classes?*

Yes, training and continuous learning from one level may be applied to training requirements for the next higher level. (Reference paragraph 6.e)

14. Can fulfillment count toward the additional 20 hours of training required for COR Level III?

No. There is no alternative to taking the mandatory minimum number of training hours at each level.

15. What documentation must accompany a COR's application for Level III certification in order to validate his/her experience and competency?

The COR nominee shall validate to the agency Acquisition Career Manager (ACM) or designee in accordance with agency procedures that he or she has gained the required experience and obtained the required technical competencies. FAC-COR competencies are available at www.fai.gov under the Certification tab. Templates to assist agencies in implementing this process will be available on the FAI website no later than October 31, 2011. (Reference Section 6.e)

16. Why did you change the name from COTR to COR?

The term "COTR" is being changed to "COR" to align with the Federal Acquisition Regulation (FAR) which now incorporates a definition for "Contracting Officer's Representative" and includes designation of a COR as part of a Contracting Officer's responsibilities {Reference [FAR 1.604](#) and [1.602-2\(d\)](#)}.

17. Does this mean that all of our previously certified COTRs must re-apply for certification under FAC-COR?

No. Unless the agency decides otherwise, current certified COTRs will be grandfathered at FAC-COR Level II. (Reference paragraph 6.b)

18. What if our agency has staff that already qualifies at FAC-COR Level III? Can they be certified as FAC-COR Level III?

Yes, agencies may, after issuing policy describing the decision process, certify currently certified COTRs at FAC-COR Level III after they validate their experience and competency to the ACM or designee. (Reference paragraph 6.b)

19. Do all CORs need to be certified immediately in order to continue serving in the COR role on current contracts?

No, agencies have until the effective date of the FAC-COR (January 1, 2012) to determine if and how to reassign their current COTRs. (Reference paragraph 6.b)

20. Is there prescribed training for each of the FAC-COR levels?

No; however, initial training for new CORs must include, at a minimum, a course covering COR roles and responsibilities as well as fundamental contract rules and regulations. In addition, it is strongly recommended that this training be provided in a classroom setting. For other CORs, any combination of classroom or online training that contributes to learning the competencies is acceptable. Required training should be determined by agency policy and the agency's

Acquisition Career Manager (ACM). Individual CORs should consult with their supervisor and the Contracting Officer to determine their specific training needs.

21. Do I have to figure out what training to take on my own?

No. You can find suggested training options (classroom, online, or a mix of both) on the FAI website (www.fai.gov) under the Certification tab.