

FREQUENTLY ASKED QUESTIONS

ABOUT THE REQUEST FOR SERVICES CONTRACT APPROVAL FORM

This document is a supplement to the Instructions on the RSCA Form, not a replacement for it. It is not a policy document.

I. When to use the Form: General Questions

Q1: An older version of the Form was used for a contract in the past; can that Form be re-used?

A1: No. Previous versions of the Form are obsolete and the most recent version of the Form must be used. The most recent version can be found at: <http://www.asamra.army.mil/scra/documents/ServicesContractApprovalForm.pdf>.

Q2: Is a Form required when a supply is purchased that also includes a service such as maintenance?

A2: The Form is applicable to “service contracts,” i.e. “tasks to be performed” rather than “supplies to be delivered.” If a product is being purchased and it comes with a “service,” such as a warranty, then the Form is not required. (However, a contract specifically for ongoing maintenance of equipment, vehicles, etc., does require a Form.) Additionally, other routine services that are incidental to a purchase may not require the use of the Form (for example, renting a space within a hotel to hold a conference is not considered a service merely because of incidental custodial work performed by hotel staff).

Q3: Is a Form required only for CONUS-related contracts?

A3: No. Though geography is relevant to the application of certain statutes/regulations, the Form is required for all service contracts, regardless of location (to include CONUS, OCONUS, and elsewhere).

Q4: For Indefinite Delivery Indefinite Quantity (IDIQ) contracts, is the Form required only for the base contract, only for individual task orders, or for both?

A4: The Form is required for IDIQ base contracts. When a task order is added to a contract, a new Form is not required if the base contract contains language that specifically references the functions in the task order. However, a Form is required if the base contract does not contain this language. (For example, in the case of a contract for analytical support, issuing a task order to perform a Lean Six Sigma study would require a new Form unless the base contract specifically referenced Lean Six Sigma (i.e. although a Lean Six Sigma study would seem to fall under the broader “umbrella” of analytical support, it is a new, specific task and so still requires analysis).) Additionally, an RSCA form must be executed annually even in cases where the IDIQ contracts have no option periods.

This is the only—very limited—exception to the requirement (under Instructions, #3) that task orders require the RSCA Form. This is very uncommon, and so personnel are encouraged to fill out the RSCA Form. They may discuss the issue with the Form’s proponents by using the contact information on Instructions sheet of the Form and/or the last page of these FAQs.

Q5: If we are awarding a contract on behalf of a non-Army customer within the Department of Defense (DoD)—or even a customer outside the DoD—is the Form still required?

A5: The Form is required by the Army Federal Acquisition Regulation Supplement (AFARS). The simplest method to determine if the Form is required is to ask—for the contract in question—if the AFARS is being applied in other respects. If so, then a Form should be completed.

A Form must be done for contracts when Army money is involved, or when work is being performed for an Army customer. A Form would not be necessary in a specific situation wherein the only Army connection to the contract relates to the awarding of the contract (e.g. the contracting officer happens to be an Army employee, but the contract is being awarded on behalf of the Air Force, for an Air Force customer, utilizing Air Force money).

Q6: A Form was submitted for a contract in the past and now an option on that contract is being exercised. Does a new Form have to be filled out, even though one was done in the past?

A6: Yes. The Form must be completed before exercising an option, even if one was done when the contract was originally awarded.

II. When to use the Form: Contract Modifications

Q7: Does a new Form have to be filled out when executing a modification that is truly administrative?

A7: No. Minor, clerical edits (like administrative modifications) to the contract that do not substantively affect its content (i.e. alterations that do not change the nature of the work) do not require a new Form. Note that this applies to changes that are essentially administrative, and does not apply to changes that will alter cost, deliverables, level of effort, and so on.

Q8: What qualifies as an administrative modification?

A8: An administrative modification to the contract is one that does not alter the substance of the content. Any mod that changes the Performance Work Statement, level of effort, manner in which the contract is performed, or the level of funding is not considered an administrative mod.

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V. When to use the Form: Cost Estimate and Incremental Funding

Q9: If a proposed contract award amount is higher than the amount originally estimated on the Form, is a new Form required?

A9: The RSCA Form is not a funding document. Contracting officers and the requiring activity should use their discretion when determining if a difference between the original estimate and the final cost warrants a new Form. This discretion should take into account the fact that, among other things, an initial cost estimate may have some variance from the final contract cost. The approval of funds for a contract is an internal matter that the Form is not intended to interfere with.

Q10: If a proposed contract award amount is lower than the amount originally estimated on the Form, is a new Form required?

A10: No. If the proposed contract award amount is lower than the original estimate, a new Form is not required.

Q11: If the contract is incrementally funded, does a new Form have to be filled out every time a modification is made to the contract to add funds?

A11: A new Form does not have to be filled out when funds are added to an incrementally funded contract, unless the original approval amount would be exceeded.

VI. When to use the Form: Specific Situations

Q12: Does a Form have to be filled out if the contract is for lodging (e.g. hotels, etc.)?

A12: No. Rental of hotel rooms for lodging, or rental of meeting or conference space, is not considered a service and so does not require a Form.

Q13: Does a Form have to be filled out in the case of equipment rental?

A13: No. The rental of equipment does not require a Form.

Q14: Does a Form have to be filled out in the case of delivery services (e.g. transport of freight, people, vehicles, etc.)?

A14: Shipping via common carrier does not require the Form. However, if the contractor is making a special delivery to the Army and it is separately priced, the Form is required.

Q15: Does a Form have to be filled out in the case of subsistence and support of persons?

A15: Preparation and serving of food on a government site are considered services and so the Form is required for those activities. Purchase of food items, however, is not considered a service and so does not require the Form.

Q16: Does a Form have to be filled out in the case of catering or meal services provided at a hotel or conference center?

A16: No. Catering and/or meal services provided in conjunction with hotel bookings or conferences do not require the Form.

Q17: Does a Form have to be filled out for the installation of equipment?

A17: Generally speaking, the installation of equipment should not require a Form, so long as the installation is part of the equipment purchase. If the installation is incidental to the purchase, then the Form is not necessary. In other words, if the installation is not separable from the equipment purchase (because the installation is integral), then the Form is not required. This is especially true in cases where the equipment must be installed as part of the purchase (for example, to retain a manufacturer's warranty).

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VII. Funding, Monetary Thresholds, and Purchasing

Q18: If the contract is funded using only Non-Appropriated Fund (NAF) monies, is the Form required?

A18: No. The Form is not required for contract services that are solely funded with NAF sources.

Q19: Is there a minimum dollar amount at which the Form is required (e.g. is the Form required for micro-purchases)?

A19: There is no minimum cost threshold for utilization of the Form. However, multiple micro-purchases can be bundled under the same Form if they are for the same service. For example, a yearly requirement for a contractor to mow the grass on post that is simply charged to a purchase card each time the service is performed would require only one Form for the entire year's requirement, rather than filling out a Form every time the contractor mowed the grass.

Q20: If multiple purchases of the same service are bundled together under one Form, does it have to be approved every time a purchase of the service is made?

A20: No. A single Form can be approved for an amount of money covering estimated costs for the full year; as long as that dollar threshold is not passed, approval of the Form the first time suffices. For example, one Form could be approved for the yearly requirement for a contractor to mow the grass on post with a dollar total estimated for the full year's expenses. Each time the contractor was paid for the service would count against the overall dollar threshold for the contract, but would not require a new Form or approval every time.

VIII. Alteration of the Form

Q21: Can we change the Form so that we can include information or requirements relevant to our Command or organization?

A21: No. The Form may not be altered and must be completed as-is. Additional forms or sheets pertaining to Command-specific information and requirements may be included with the Form as long as those additions are local supplementations which do not contradict anything in the Form and are *attached to the unaltered Form itself*.

IX. Further Information

Q22: The worksheets of the Form reference a number of different documents; where can these be found?

A22: All the regulations, statutes, etc., referenced in the Form can be found on the website of the Assistant Secretary of the Army (Manpower and Reserve Affairs) Force Management, Manpower and Resources, which is located at:
<http://www.asamra.army.mil/scra/>.

Q23: How can I tell what has changed between the most recent version of the Form and a prior version?

A23: Along with the Form and this FAQ, a "Change Log" is now available on the above website. This change log provides brief descriptions of technical changes and content updates to the Form, along with the dates of those changes/updates, so that users can quickly and easily see what has changed between versions.

Q24: Can we share the Form with contractor personnel?

A24: The front page of the RSCA Form contains cost and CME information. This information is For Official Use Only/ Procurement Sensitive, and the front page has been updated to reflect that. As such, the Form should not be shared with non-Government personnel, and should generally be shared only with Government personnel who have a need to know.

X. Technical Updates to the Form

Suggestions regarding non-substantive, technical alterations/changes to improve the Form's usability/clarity (including additions to this FAQ) are very welcome. Comments of this nature can be directed to 703-693-2109.