



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Division of Contracting and Facilities  
Management  
Arlington, VA 22203

In Reply Refer To:  
FWS/CFM

SEP 29 2004

DIVISION OF CONTRACTING AND FACILITIES MANAGEMENT POLICY MEMORANDUM 04-23

To: Chiefs, Divisions of Contracting and General Services, Regions 1-7  
Chief, Branch of Acquisition and Assistance Operations, Washington Office  
Field Warranted Contracting Officers and All Purchase Card Holders

From: Chief, Division of Contracting and Facilities Management, and  
Bureau Procurement Chief

Subject: Authorities and Limitations on Ordering Printing and Copying Services

This memorandum establishes new policy for acquiring printing and copying services. In accordance with Department of the Interior Acquisition Policy Regulation 2004-06 (attachment A), we have obtained Government Printing Office Waiver #99005 for urgent printing and copying orders that are needed within 48 hours or less. This waiver makes no distinction between "copying" and "duplicating," so to keep it simple, these terms mean the same thing and there are no separate standards for them. True "printing" services are also covered by this waiver.

For guidance to purchase printing and copying services, refer to appendix 1, "Using Our GPO Waiver #99005 to Obtain Small, Urgent Printing and Copying Services," appendix 2, "Simplified Chart of Ordering Options," and appendix 3, "Using GPO's Simplified Purchasing Agreements for Other Printing & Copying Services."

Regional Publication Coordinators are required to periodically report to the GPO on our use of the waiver. Thus, it is very important that all programs follow the guidance for printing and copying services. Individuals that refuse to comply with the rules of the waiver may cause the GPO to withdraw our waiver and subject us to the more restrictive rules of DIAPR 2004-06.

For additional information on this issue, please contact your Regional Publication Coordinator or Neil Ray, Procurement Analyst, at (703) 358-2285 or [Neil\\_Ray@fws.gov](mailto:Neil_Ray@fws.gov). You may go to: [http://sii.fws.gov/r9cgs/PDF/CFM\\_POLICY\\_LOG.pdf](http://sii.fws.gov/r9cgs/PDF/CFM_POLICY_LOG.pdf) to obtain additional copies of this Policy Memorandum and attachments.

Attachments

cc: Regional Charge Card Coordinators  
Regional Publication Coordinators  
Chief, Division of Financial Management  
Director, National Conservation Training Center  
Chief, Branch of Printing and Publications

June 16, 2004

Department of the Interior Acquisition Policy Release (DIAPR) 2004-06

SUBJECT: Departmental Copying Policy

*1. Purpose:*

To establish Departmental policy that: (1) distinguishes copying from other types of reproduction work; and (2) specifies the proper circumstances under which copying services may be obtained from commercial sources without requesting and obtaining a waiver from the Government Printing Office.

*2. Effective Date:*

This policy is effective immediately.

*3. Expiration:*

This policy release shall remain in effect until the following policy is formally incorporated into the Departmental Manual under Part 314, Printing and Publications, and Part 1408 of the Department of the Interior Acquisition Regulation.

*4. Background and Explanation:*

The Joint Committee on Printing (JCP) printing and binding regulations stipulate that an agency's central printing and publication management organization has authority over the control, production, and procurement of reprographic equipment. For the Department of the Interior, these responsibilities are delegated to the Interior Publishing Council.

The Interior Publishing Council recently drafted, sought and received (on June 17, 2004) GPO concurrence on a Departmentwide policy that distinguishes copying from other types of reproduction work, and specifies the proper circumstances under which copy services may be obtained from commercial sources without requesting and obtaining individual waivers from GPO.

*5. Policy:***A. Definitions.**

1. *Duplicating* is the mass reproduction of materials beyond the capabilities of typical office copiers. Volumes are of sufficient mass quantities up to 5000 single page and 25,000 production units in the aggregate of multiple pages. This type of work is usually accomplished through GPO duplicating term contracts or processed through authorized centralized duplicating operations that may have been established for efficiency and cost savings. Such duplicating units shall require Departmental approval processed through the Interior Publishing Council.

2. *Copying* is further distinguished from "duplicating" in that such work is administrative in nature, produced on office copying equipment, and produced as necessary in limited quantities. Volumes typically range from 1 to 500 single-page production units to 2,500 production units in the aggregate of multiple pages. This volume standard is referred to as the "500/2500" rule.

**B. Acquiring Copying Services.**

Requirements meeting the *copying* definition in paragraph A.2 above that cannot be fulfilled through available resources may be referred to a commercial source without seeking GPO approval. Only employees with micropurchase authority may procure copying under these provisions. Qualifying work must meet the following criteria:

- A. Quantities must not exceed the “500/2500” copying rule, i.e., you may make up to 500 copies of a single page document, or up to 2,500 total copied pages of a multiple page document, AND
- B. Cost not more than \$500 and be charged to the employee’s purchase card, AND
- C. Work is being produced while employee is on official travel or attending a conference, OR
- D. Resources, including GPO, are not readily available (e.g., within the immediate area where the work is required to be accomplished) or accessible (e.g., requirements emerge after hours or on weekends) to the employee to obtain the work within the required time frame.

**C. Process and Documentation.**

These transactions are to be processed using the attached “Copy Work Obtained From A Commercial Source” form to ensure that work produced meets the conditions outlined above. The completed forms will be maintained with the cardholder’s purchase card documentation and processed in accordance with internal bureau procedures regarding purchase card transactions. A copy of the completed form must also be provided to the bureau printing officer. All charges are processed under object class 242A – Printing and Reproduction-Commercial.

**D. Work Exceeding the “500/2500” Rule.**

Reproduction work exceeding the “500/2500” rule is *duplicating*, and requires a waiver from the nearest servicing GPO office. Employees should consult with their bureau printing officer or Interior Publishing Council representative to secure such a waiver.

**6. Action Required:**

This policy may be implemented immediately for all appropriate actions. (An amendment will be issued when a DI form number is provided to the attached form.) The Department of the Interior Integrated Charge Card Guide will be amended to include the policy for acquiring copying services.

If you have any questions, please contact Patricia Corrigan of this office on 202-208-1906.

U.S. GOVERNMENT PRINTING OFFICE  
Washington, DC 20401

No. 99005

October 13, 1998

Department: Interior

Attn: Mr. Roy Francis:

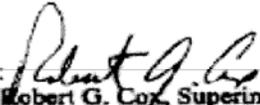
You are hereby authorized, under the authority of Sections 101 and 504, Title 44, United States Code, and all amendments and supplements issued thereunder, to proceed with direct commercial procurement, in accordance with the law, on the work called for in your request dated October 5, 1998.

This open waiver is issued for duplicating work required in 48 hours or less, costing not more than \$1,000. and color copying costing not more than \$500.

It is hereby certified, by the Public Printer, under the authority of Section 207 of Public Law 102-392 that the work covered by the subject memorandum, is determined, on the basis of the information supplied by the ordering agency, to be more economically produced without reference to the Government Printing Office.

This waiver is issued on the basis of this certification.

THE PUBLIC PRINTER

By:   
Robert G. Cox, Superintendent  
Departmental Account Representative Division

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Insert the following information on a copy of this authority and return to GPO within one week of this waiver.

Appropriation- \_\_\_\_\_ Expenditure \_\_\_\_\_

Date ordered \_\_\_\_\_ Date Completed \_\_\_\_\_

Contractor Name and Address \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NOMINATION & APPOINTMENT OF AUTHORIZED ORDERING OFFICER
For
GPO SMALL PURCHASE AGREEMENTS

SUPERVISOR'S NOMINATION and INITIAL CGS APPROVAL

I nominate this employee to participate in the Simplified Purchase Agreement (SPA) program for buying printing and copying services from Government Printing Office contractors. This employee already has micropurchase authority in the Government Commercial Purchasecard Program and has demonstrated consistent responsibility and good judgment in using that authority. I understand the purposes and limitations of the SPA program, and, as this employee's supervisor, I will ensure that s/he will fully comply with its requirements.

Employee's name: \_\_\_\_\_ Position: \_\_\_\_\_
Telephonenumber: (\_\_\_\_) \_\_\_\_\_ Fax number: (\_\_\_\_) \_\_\_\_\_
E-mail address: \_\_\_\_\_
Mail address: \_\_\_\_\_
Micropurchase card authority: \$ \_\_\_\_\_ maximum per order
Requested SPA authority: \$ \_\_\_\_\_ max. per order (\$2,325 unless otherwise stated)

\_\_\_\_\_, 20\_\_\_\_
Supervisor's Printed Name and Signature \_\_\_\_\_ Title \_\_\_\_\_ Date

Nomination approved. This employee is recommended for GPO training.

\_\_\_\_\_, 20\_\_\_\_
Printed Name and Signature \_\_\_\_\_ Chief, Division of Contracting & General Services \_\_\_\_\_ Date

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EMPLOYEE'S CERTIFICATIONS

- 1. I have read the Division of Contracting and Facilities Management Policy Memorandum No. 04-23 and its attachments. I understand the policies and limitations stated there, and I will ask my supervisor or the Regional CGS Chief if any questions should arise over the proper interpretation of those policies.
2. I have read the "Responsibilities" printed on the other side of this form. I understand them and I agree to fully comply with them if I am appointed as an authorized SPA ordering officer. I realize that this authority is a privilege which may be withdrawn at any time, and that it is not automatically transferable to other positions within the U.S. Fish and Wildlife Service.
3. I have successfully completed the Government Printing Office's training course. A copy of my training certificate is attached.

\_\_\_\_\_, 20\_\_\_\_
Printed Name and Signature \_\_\_\_\_ Title \_\_\_\_\_ Date

\*\*\*\*\*

APPOINTMENT

I hereby appoint \_\_\_\_\_ as an authorized ordering officer for printing and copying services under the Simplified Purchasing Agreement program of the Government Printing Office. This appointment is continuous until it is terminated by me or my successor, but only while this employee occupies her/his current position within Region \_\_\_ of the U.S. Fish and Wildlife Service.

MAXIMUM PURCHASING AUTHORITY IS LIMITED TO \$ \_\_\_\_\_ PER ORDER.

\_\_\_\_\_, 20\_\_\_\_
Printed Name and Signature \_\_\_\_\_ Chief, Division of Contracting & General Services \_\_\_\_\_ Date

**RESPONSIBILITIES OF SPA PROGRAM AUTHORIZED ORDERING OFFICERS****If appointed as an authorized ordering officer in the Simplified Purchasing Agreement (SPA) program:**

1. I will only use printers which are participating in the SPA program. To determine this, I will check the latest list of GPO-approved SPA vendors before placing each order.
2. I will not use my SPA program purchasing authority if I am told by my Regional Printing Coordinator that the work I need done is covered by a GPO term contract. Instead, I will refer the requirement to a warranted Contracting Officer for award.
3. I will not split work orders to remain within the SPA program limit of \$2,325 per order or my personal authorization limit, whichever is least.
4. If the work is expected to cost more than \$1,000, I will obtain quotes from at least 3 participating SPA printers. If for any reason I do not obtain at least 3 quotes, I will explain why in a note to the file. If I decide to not to select the printer with the lowest-priced quote, I will write a brief note to the file explaining why I believe it is in the Government's best interest to pay the higher price.
5. If the material being printed or copied has public or educational value, I will complete a *Notification of Intent to Publish* (GPO Form 3868) and submit it to the Superintendent of Documents on-line at [http://www.access.gpo.gov/su\\_docs/forms/3868/index.html](http://www.access.gpo.gov/su_docs/forms/3868/index.html)
6. If I encounter any quality control or delivery problems with SPA printers, I will ask my Regional Publications Coordinator for assistance in resolving them.



**NOTIFICATION OF INTENT TO PUBLISH—FORM 3868**

To insure that your publication will receive proper consideration for inclusion in our Sales and Depository Library programs, please supply all of the requested information available at the time this form is submitted. Please submit at least 30 days before sending in your Printing Requisition, whether you recommend your publication for sale or not. Two copies of the completed form should be sent to: Documents Control Branch (SSMC), U.S. Government Printing Office, Washington, DC 20402.

Stock Number \_\_\_\_\_ (SuDocs will provide.)

Printing and Binding Req. Number \_\_\_\_\_

RPPO Control Number \_\_\_\_\_

Date Submitted \_\_\_\_\_

Please notify  publisher  printing officer of rider decision.

Please type. Form is aligned for typewriter use.

Part I. To be completed by AGENCY PUBLISHER or PROGRAM OFFICER.

\_\_\_\_\_  
 (Publisher, Program Officer, or Author's Name) (Position or Title) (Area Code) (Phone)  
 \_\_\_\_\_  
 (Publishing Agency) (Bureau)

1. Title of publication \_\_\_\_\_
2. What publication does it supersede? Stock Number \_\_\_\_\_ Title \_\_\_\_\_
3. How does this compare with previous editions? \_\_\_\_\_
4. Intended target audiences. (Please be as specific as possible, e.g., indicate *fossil fuel energy researchers* instead of *researchers or scientists*.)  
 \_\_\_\_\_
5. Brief description of contents \_\_\_\_\_  
 \_\_\_\_\_
6. Quantity for agency distribution \_\_\_\_\_ Specific audiences for agency distribution \_\_\_\_\_
7. Recommended for sale  Yes—Quantity \_\_\_\_\_  No Reason for recommendation \_\_\_\_\_
8. Suggested audiences for sale copies \_\_\_\_\_
9. Please check types of promotions planned by agency for sales copies:  
 Flyer—Quantity \_\_\_\_\_ Audiences \_\_\_\_\_  
 Press Releases—Quantity \_\_\_\_\_ Audiences \_\_\_\_\_  
 Review Copies—Quantity \_\_\_\_\_ Audiences \_\_\_\_\_  
 Advertising In:  Agency Publications  Paid Media  Other \_\_\_\_\_ Est. Total Circulation \_\_\_\_\_
10. Will agency mailing lists be used for your promotional mailings?  No  Yes If yes, number of addresses available \_\_\_\_\_
11. Depository Library distribution  Yes  No If no, reason (See reverse for explanation)  1)  2)

Part II. SPECIFICATIONS: To be completed by AGENCY PRINTING OFFICER.

\_\_\_\_\_  
 (Printing Officer's Name) (Area Code) (Phone)

12. Publication description:  Non-subscription  Subscription  New  Revision  Reprint
13. FORMAT: Series—Number \_\_\_\_\_ Anticipated revision date \_\_\_\_\_ Series—Title \_\_\_\_\_  
 book  tape COVER:  self BINDING:  saddle stitch  looseleaf  banded  
 folder  microform  paper  side stitch  punched  shrink wrapped  
 form  other \_\_\_\_\_  casebound  adhesive  drilled  other \_\_\_\_\_  
 map  other \_\_\_\_\_  sewn
14. Unit of Issue \_\_\_\_\_ No. of Pages \_\_\_\_\_ No. of Illustrations \_\_\_\_\_ Trim Size \_\_\_\_\_ No. of Foldins \_\_\_\_\_
15. 4-color process  Yes  No Color of ink (Cover) \_\_\_\_\_ (Text) \_\_\_\_\_
16. Paper: Cover \_\_\_\_\_ Text \_\_\_\_\_ Est. Del. Date \_\_\_\_\_
17. Jacket No. \_\_\_\_\_ Program No. \_\_\_\_\_ Print Order No. \_\_\_\_\_
18. Printer:  Main GPO  Deal Direct  Waiver  GPO Regional Office (City) \_\_\_\_\_

Part III. To be completed by SUPERINTENDENT OF DOCUMENTS.

Req. Number \_\_\_\_\_ IMS initials/Date \_\_\_\_\_

19. SuDocs riding for \_\_\_\_\_ copies  Not for sales  For sale line only  Individual cartons  Cartons  ISBN
20. Dep. Lib. riding for \_\_\_\_\_ copies File Copies \_\_\_\_\_ IES Copies \_\_\_\_\_ Item number \_\_\_\_\_

Part IV. This space may be used by AGENCY.

GPO will ride for \_\_\_\_\_ paper copies \_\_\_\_\_ cloth copies  
 Paper S/N \_\_\_\_\_ Price: \$ \_\_\_\_\_ Cloth S/N \_\_\_\_\_ Price: \$ \_\_\_\_\_

## INSTRUCTIONS FOR COMPLETING THIS FORM

To insure that your publication receives proper consideration for inclusion in our Sales and Depository Library programs, please supply all pertinent information available at the time this form is submitted. By providing complete information 30 days prior to submitting your printing requisition, you can be assured that we will have adequate time to make the best decision. Please attach an additional sheet of paper to this form if you require more space to provide complete information.

**REMINDER:** Please retain a copy of this completed form for your records so that you can add GPO stock numbers and prices if the Superintendent of Documents rides your requisition for sales copies.

If you have any questions or need help with the Sales, Depository Library, or Marketing programs, please call:

|   |  |  |
|---|--|--|
| <b>Sales Service</b><br>Chief Documents<br>Control Branch<br>(202) 512-2414 | <b>Library Program Service</b><br>Chief, Depository<br>Administration Branch<br>(202) 512-1071 | <b>Marketing Office</b><br>Director of Marketing<br>(202) 512-2258 |
|---|--|--|

Most of the items on this form are self-explanatory. Additional explanations for some items are given below:

**Part I—Agency Publisher or Program Officer:** The individual named should be knowledgeable about the content, planned distribution, and marketing of the publication (e.g., editor, publisher, author, or program officer).

2. **What publication does it supersede?** Supply the publication title(s), series number and stock number(s) of the edition(s) which the new publication replaces.

3. **How does this compare with previous editions?** Specify any differences in information, specifications, and content in the new edition.

5. **Brief description of contents:** If a description is contained in the preface, foreword, introduction, or title page, you may attach a copy of the appropriate section instead of filling in this section.

6. **Specific audiences for agency distribution:** Specify what target audience and how many copies of the publication your agency will be distributing.

7. **Recommendation for sale:** If yes, include specific audiences that might be targeted and the estimated size of each audience. Please be as specific as possible, e.g., indicate *energy researchers* instead of *scientists*. If no, explain.

11. **Depository Library Distribution:** 44 U.S.C. Section 1902 requires that Government publications be made available to depository libraries, unless they are:

1. "determined by their issuing components to be required for official use only for strictly administrative or operational purposes *which have no public interest or educational value*" [Emphasis added]
2. "classified for reasons of national security"

If you have answered "no" to question 11, you must indicate into which of the above exception categories your publication falls. (The agency does not bear the cost of depository copies if the document is printed through GPO.)

## Appendix 1

### Using Our GPO Waiver #99005 to Obtain Small, Urgent Printing and Copying Services

1. Our waiver is only for urgent printing and copying orders that are needed within 48 hours or less.
2. The cost of a single order must not exceed \$1,000 for black and white work or \$500 for color work.
3. All Acquisition Requests for commercial copying work must be reviewed and approved by the Regional Publications Coordinator – even for simple jobs when a purchase card is used for payment. In addition, you will need to submit a completed waiver form (attachment B). The coordinators need this information to make periodic reports to GPO on our use of the waiver.
4. When their Acquisition Request is fully approved, employees with the purchase business line on their Government cards (plus all warranted Contracting Officers) may obtain these services. However, employees with only the travel or fleet lines must not use these Government cards under any circumstance to buy copying services (or any other services or products not directly related to official travel or fleet needs). Such abuses result in unauthorized commitments, ratifications and disciplinary actions, and could cause the Service to lose its GPO waiver privileges. Employees without the purchase business line should find someone with the proper authority to make the purchase.
5. We may choose from the local print vendors that best suits our needs. We are not limited to vendors with contractual commitments to GPO. Competitive quotes are not required for orders of \$1,000 or less, but buyers must ensure that all prices paid are at least “reasonable.” So, program managers and buyers should realize that they can save 50% or more by using GPO contract printers. Obtaining competitive quotes from GPO contract printers can sometimes be done within a few hours and result in major savings. Discuss these possibilities with your Regional Publications Coordinator.

**Simplified Chart of Ordering Options**

| Requirement   | Method  |
|---|---|
| 1. <u>Urgent copying/printing under GPO waiver.</u><br>*black and white up to \$1,000 per order.<br>*color up to \$500 per order. | AR approved by Regional Publications Coordinator.<br><ul style="list-style-type: none"> <li>• Complete waiver form (Attachment B). Choose best local printer/copy firm.</li> <li>• Pay with Government purchase card.</li> </ul>                              |
| 2. <u>Less urgent copying/printing up to \$2,325.</u><br><br>A. Under \$1,000 per order<br><br>B. \$1,001 - \$2,325 per order     | AR and SPA order form (Attachment D) approved by Regional Publications Coordinator.<br><br>A. No quotes required. Choose GPO vendor. GPO pays via IPAC billing.<br><br>B. Get at least 3 quotes from GPO vendors. Select the best. GPO pays via IPAC billing. |
| 3. <u>All other requirements.</u>   | AR approved by Regional Publications Coordinator. Take to CGS for award of either:<br><br>A. Order on GPO term contract, or<br><br>B. Purchase order.   |

**Using GPO's Simplified Purchasing Agreements for Other Printing & Copying Services**

1. Simplified Purchasing Agreements (SPA) are similar to the Federal Supply Schedule contracts for a variety of printing and copying services. GPO establishes agreements with print shops across the country, enforces quality and cost control standards, and provides assistance if any problems develop.
2. Prices from SPA contractors are generally much lower than we could obtain with our single buys at retail prices. So, we should try to use the SPA program to save money on larger jobs (and even for smaller jobs that aren't really urgent).
3. Individual SPA orders may not exceed \$2,325 (leaving room for GPO's fee within the normal \$2,500 limit for micropurchases). All orders over \$2,325 require other methods such as purchase orders and orders against GPO term contracts. Those must be done by a Contracting Officer.
4. For individual orders above \$1000, compare quotes from at least three SPA contractors. This can sometimes be done within a few hours. A brief written justification is needed for (A) any sole-source (non-competitive) awards over \$1000, and (B) any awards to vendors other than the lowest-priced quoter (unless "best value" terms were announced and used; GPO is working on these terms, but most Contracting Officers are familiar with them already).
5. Regional CGS Chiefs, in consultation with their management, will establish standards for employees to be designated as "authorized ordering officers" on the SPA to obtain printing and duplicating services. We recommend limiting most appointments to warranted purchasing agents, to program administrative officers who already have Government purchase card privileges, and to Regional Publications Coordinators.
6. Supervisors may nominate employees using the form in attachment C. Regional CGS Chiefs will review and approve the nominations before the nominated employees attend GPO training courses.
7. Employees whose nominations have been initially approved must then:
  - A. Complete a GPO training course on SPA procedures (consult your Regional Publications Coordinator about course times and places);
  - B. Read this CFM Policy Memorandum and the "Responsibilities of SPA Program Ordering Officers" on the back of the nomination form; and
  - C. Sign and submit the nomination form to their Regional CGS Chief for final appointment.

8. The Regional CGS Division will maintain a consolidated list of the authorized SPA ordering officers in their Region. A copy of the list and all changes to it will be given to the Regional Publications Coordinator and to the Service's Printing and Publications Coordinator. He/she will pass the list and all periodic changes to GPO, and GPO will provide the official list and changes to each of its participating SPA vendors.

9. To obtain services or supplies, authorized SPA ordering officers must complete an Acquisition Request and a SPA Order Form (attachment D) detailing the copying/printing requirements, obtain the necessary approvals (including that of the Regional Publications Coordinator), obtain at least 3 quotes, and then place the order directly with the selected SPA vendor.

10. Wherever possible, ordering officers should ask vendors for information on – and give preference in their awards to – small businesses, small-disadvantaged businesses, 8(a), women-owned businesses, HUBzone small businesses, veteran-owned small businesses, and service-disabled veteran-owned small businesses.

11. If the material being printed or copied has public or educational value, ordering officers must complete a Notification of Intent to Publish (GPO Form 3868) (attachment E) and submit it to the Superintendent of Documents on-line at [http://www.access.gpo/su\\_docs/forms/3868/index.html](http://www.access.gpo/su_docs/forms/3868/index.html).

12. Payments for services rendered will be made by GPO to the SPA vendor via IPAC billing. Do not use the Government Purchase Card and other payment methods with SPA purchases.

13. Quality control and delivery problems with SPA vendors should be referred to the Regional Publications Coordinators for resolution.

14. Regional Publications Coordinators will be responsible for gathering all data, document copies, etc., and for compiling any reports required.