

FDA STAFF MANUAL GUIDES, VOLUME III - GENERAL ADMINISTRATION

PROCUREMENT AND SUPPLY MANAGEMENT

PREPARING REQUISITIONS FOR ALL CONTRACT ACTIONS WITH AN ESTIMATED VALUE GREATER THAN THE SIMPLIFIED ACQUISITION THRESHOLD

Effective Date: 08/12/2011

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1. PURPOSE

This guide sets forth the FDA policy and procedures for preparing requisitions for all contract actions greater than the Simplified Acquisition Threshold (SAT). It applies to all new awards (including all options) and all modifications executed by the Office of Acquisitions & Grants Services (OAGS) with an estimated value greater than the SAT.

2. DEFINITIONS AND CONCEPTS

- A. Acquisition Planning: Acquisition Planning is the strategic development of a comprehensive plan for meeting FDA's requirements in a timely manner and at a reasonable cost. It is an integrated process requiring the coordinated efforts of all personnel involved in the acquisition. Acquisition Planning enables FDA to meet its socioeconomic goals, and support full and open competition and commercial item purchases to the greatest extent practicable.
- B. Acquisition Team (Team): The Team consists of program and contracting representatives to include the Contracting Officer, Contract Specialist, Project Officer (PO)/ Contracting Officer Technical Representative (COTR), and the end user or other designated needed (i.e., Cost Price Analyst, legal counsel, etc.)
- C. Advance Acquisition Plan (AAP): The AAP, an effective management tool for acquisition planning and tracking purposes, identifies all FDA anticipated acquisition actions over \$150,000 for a given fiscal year. The AAP is a compilation of all individually submitted FDA Center Acquisition

Plans (CAPs) and is regularly updated to capture any changes reported in the monthly CAP submittals. Its successful completion requires the collaborative effort of all key acquisition personnel in OAGS and the FDA Centers/Offices.

- D. Center Acquisition Plan (CAP): Each Center must develop its own individual CAP for a given fiscal year. The CAP must provide a sufficiently clear and detailed description of each requirement (planned contract w/options, modification, delivery order, task order, purchase order, grant, interagency agreement and options to be exercised) having an estimated value anticipated to exceed \$150,000. As part of the CAP submittal, Centers must create a Center Item Number for each item for management tracking purposes. Centers are required to present their initial CAPs to the OAGS Acquisition Management Team prior to the ensuing fiscal year. CAP updates are to be submitted to OAGS by the last calendar day of each month.
- E. Contracting Officer (CO): The CO is a Federal employee having the sole Government Official having the authority to legally bind the Government by signing a contractual instrument (enter into a contractual agreement), administer and/or terminate contracts, and make related Determinations and Findings. A written Certificate of Appointment (Warrant) sets forth the extent and monetary limits of a Contracting Officer's authority.
- F. Contracting Officer Technical Representative (COTR): The COTR is a Federal employee, appointed in writing, who serves at the Contracting Officer. **The COTR does not have the authority to bind the Government by either signing a contract or entering** into a contractual arrangement. The COTR is responsible for ensuring contractor performance complies with the terms and conditions of the contract, to include meeting all technical requirements and delivery dates in a timely manner. The COTR monitors contractor performance to ensure the work and costs are within the estimated costs and/or price of the contract. COTRs must satisfy HHS FAC-COTR training and certification requirements (HHSAR 301.604) however, certification alone does not guarantee appointment. A COTR must be appointed by a Contracting Officer who sets forth the COTR's responsibilities and authority in the Letter of Appointment.
- G. Contract Specialist (CS): The CS is a Federal employee employed by OAGS who may negotiate, administer, and close-out contracts subject to the review and approval of the Contracting Officer. The CS advises the PO/ COTR and serves as the main Point of Contact throughout the acquisition process.

- H. iProcurement: As part of HHS's Unified Financial Management System (UFMS), iProcurement is a web-based application where FDA's requisitions are entered, approved, and tracked on a real time basis. Most requisitions are entered into iProcurement by an FDA designated Requestors/Requisitioners (budget approval official or other approval official), Requestors/Requisitioners must identify the appropriate funding information (Common Account Number 'CAN' and Object Class) for each line item when entering the requisition [sometimes the correct CAN is not known, i.e. – Central Funds; if the CAN is incorrect it must be corrected by one of the approval points]. When entered, the requisition is routed through predefined approval chains (if previously generated); approval chains may be modified. With the final approval of the Center or an external approval source (i.e., Chief Information Officer), the iProcurement requisition creates a commitment record in UFMS. iProcurement may also be used to receive goods and services.
- I. Market Research: Market research is the process by which FDA uses to seek out potential sources. In accordance with FAR and HHSAR, Market Research must be conducted for all requirements, the extent of which will vary depending on the complexity of the requirement. Conducted by the Acquisition Team, the process can include contacting knowledgeable Government and industry sources regarding market capabilities; reviewing recent market surveys for same/similar requirements; publishing formal requests for information; reviewing manufacturer catalogs, product literature and business websites; information meetings or pre-solicitation conferences to engage potential offerors early on into the acquisition process. The findings are heavily relied upon when drafting the Request for Contract, the Statement of Work, the Independent Government Cost Estimate, and justifications. Market Research is the means by which FDA meets its socioeconomic goals and support full and open competition and the purchase of commercial items to the greatest extent practicable.
- J. Performance Incentive: A performance incentive is a contractual provision used to motivate contractor performance. It provides the contractor an opportunity to earn a higher profit or fee based on his performance which is tied to cost, delivery or technical quality. Incentives are typically incorporated into the Quality Assurance Surveillance Plan (QAP) and specified as performance targets. When the contractor exceeds these targets there is the opportunity for an increase; however, if the contract fails to meet the targets the profit or fee may be reduced.
- K. Performance Work Statement (PWS): A PWS is a Statement of Work specifically developed for performance-based acquisitions. It is a written document, clearly describing the work requirement objectives in terms of measurable outcomes or results. When preparing a PWS, COTRs must, to the maximum extent practicable, (1) describe the work in terms of the

purpose of the work vs. “how” the work is to be performed or the hours to accomplish it; and (2) ensure the work is assessed against measurable performance standards (see QAP).

- L. Project Advisory Group (PAG): The PAG consists of three or more persons designated by the sponsoring Center/Office to serve as an advisory and review body on technical matters during the acquisition process. The COTR is responsible for planning, organizing, and convening meetings of the PAG. The PAG may be responsible for one or more of the following activities for a given requirement: (1) reviewing the proposed Statement of Work, (2) establishing proposal evaluation criteria, (3) evaluating technical and cost proposals, (4) analyzing contractor progress during the performance period, and (5) executing a final technical evaluation of the contractor's accomplishments. A minimum of 50% of the technical proposal evaluators, regardless of their technical experience, must complete the Federal Acquisition Institute on-line course "CLC 222 – Contracting Officer's Representative (COR)" (available at www.fai.gov) or an equivalent. They are not required to be FAC-COTR certified.

- M. Project Officer (PO): The PO is a Federal employee who provides the technical expertise to the Acquisition Team, and confers with the Contract Specialist/Contracting Officer prior to contract award or the award of task/delivery order. The PO may be named COTR after contract award, but must meet HHS's COTR training and certification requirements (HHSAR 301.605) prior to appointment. In this SMG, *Project Officer* is considered to be synonymous with Contracting Officer Technical Representative (COTR), and the latter term will be used hereafter.

- N. Quality Assurance Surveillance Plan (QASP): The QASP, a critical quality control tool, is uniquely tailored to correspond to the PWS objectives. It specifies the area of work which requires surveillance, the method of surveillance, the surveillance site and time, and the significance and effect of the results. The QASP should clearly describe how FDA will survey, observe, test, sample, evaluate and document contractor performance. Each QASP should be written to ensure the Government's end objectives are met. . It is most commonly: (1) produced by the Government and disseminated with the PWS in the solicitation, (2) produced by the contractor when a solicitation, containing a Statement of Objectives, requires a QASP be submitted with the PWS in the contractor's proposal, or (3) developed concurrently by the Government and the contractor during the negotiation of the contract award.

- O. Simplified Acquisition Threshold (SAT): The SAT, established by the Federal Acquisition Streamlining Act of 1994, provides the monetary threshold for all acquisitions. The exception to this guidance is for supplies

or services that, as determined by the head of the agency, are to be used to support a contingency operation or to facilitate defense against or recovery from nuclear, biological, chemical, or radiological attack in accordance with FAR 2.101. The SAT is increased to \$150,000 (to include all options) by FAC 2005-45, issued August 30, 2010.

- P. Sponsor: The Sponsor is the Center/Office having the specific acquisition requirement and responsible for the commitment of funds for the proposed contract.
- Q. Statement of Objectives (SOO): A SOO is a Government-prepared document incorporated into a solicitation that provides maximum flexibility for offerors to propose innovative or cost-saving concepts, designs, or approaches for performance-based acquisitions. It identifies the overall, basic, top-level objectives of the acquisition and is the focal tool for both Government and offerors. Solicitations containing a SOO may require the contractor draft and submit a PWS and QASP with his proposal.
- R. Statement of Work (SOW): The SOW is defines the government's need. It describes the actual work to be performed by the contractor, which an offeror must address in his proposal. The SOW includes (1) specifications or other minimum requirements; (2) quantities; (3) performance dates, including deliverables schedules and option periods; (4) time and place of performance; and (5) quality of performance. It establishes the baseline for which contractor performance will be measured by.
- S. Unified Financial Management System (UFMS): UFMS is an integrated system allowing purchasing functions to flow directly to Accounts Payable and the General Ledger modules.

3. POLICY AND RESPONSIBILITIES

PREPARATION OF THE REQUEST FOR CONTRACT (RFC)

The RFC serves as the official request for initiating a contract action in accordance with this SMG. The RFC should contain all necessary approvals and authorizations for the proposed contract action, and identify all administration details and funding commitment information. Unless a Center/Office (Center) is working with OAGS for advance planning purposes regarding a given requirement, Centers must submit a requisition for each RFC through iProcurement before OAGS will process it. When entering a requisition over \$1500, 000. Centers must enter the Center Item Number reflected in their CAPs in the iProcurement Requisition 'Description' field. In addition, the RFC must include either a completed HHS Acquisition Plan (AP) or, for smaller and less complex actions, a Memorandum of Need (MON);

requirements for each document are identified in Sections 3.A. and 3.B. of this SMG below:

A. REQUIREMENTS FOR THE ACQUISITION PLAN (AP).

The Contracting Officer Technical Representative (COTR) should seek the assistance of the Contracting Officer (CO)/Contract Specialist (CS) as early as possible when developing an AP (HHSAR 307.104(c) and (e)). Unless revised by mutual agreement, the PO is ultimately responsible for completing and submitting an accurate and approved AP to OAGS no later than the date agreed upon by the CO and PO in the acquisition milestone schedule (see Part V of the AP).

An approved AP is required for all proposed acquisitions expected to exceed \$500,000 (inclusive of options), in accordance with HHSAR 307.7101 with the following exceptions:

1. Letter contracts
2. Unsolicited proposals
3. Regulated utility services available from only one source
4. Proposals under the Small Business Innovative Research (SBIR) and Small Business Technology Transfer (STTR) programs
5. Acquisition of commercial items/services – see **FAR 2.101**, including orders placed under **FSS** contracts meeting the definition of a commercial item/service, and not exceeding \$6.5 million [\$12 million for acquisitions as described in **FAR 13.500(e)**]
6. Task orders or delivery orders of any dollar amount placed under (i) an IDIQ contract, other than a GWAC; or (ii) a BPA, provided there is an approved acquisition planning document for the original action, and there is no significant deviation from that plan.
7. Orders of any dollar amount placed under HHS-wide (HWAC) strategic sourcing vehicles
8. Contract/order modifications that (i) exercise options; (ii) only provide additional funding; or (iii) make changes authorized by the Changes clause.
9. Assisted acquisitions (HHSAR 317.7002) processed pursuant to an interagency agreement. OPDIV must comply with requirements

specified in **317.5 Interagency Agreements under the Economy Act and 317.70, Multi-agency and Intra-agency Contracts**

10. In urgent or other justifiable cases, such as an emergency acquisition (**FAR Part 18**) the Director of OAGS may waive in writing the requirement for completion of an AP. The request for waiver will not be approved if the waiver request is based on the lack of advance planning. At a minimum, a waiver request must include all of the following:

- a. description of the requirement, including estimated cost/price and period of performance (inclusive of options)
- b. The rationale for the request to waive the AP.
- c. Signatures of the PO and CO.

A copy of the HCA approved waiver must be provided to HHS within 5 business days of approval.

An electronic copy of the AP and waiver request may be downloaded at <http://www.hhs.gov/policies/hhsar/subpart307-71.html#307.7103Format>.

B. REQUIREMENTS FOR THE MEMORANDUM OF NEED (MON).

An approved MON is required for acquisitions not requiring an AP, other than those assisted acquisitions processed pursuant to an interagency agreement. Each MON ordinarily consist of (6) parts, as provided in Sections 3.B.1. through 3.B.6. below:

The COTR should seek the assistance of the Contracting Officer (CO)/Contract Specialist (CS) as early as possible when developing the MON. The COTR is ultimately responsible for completing and submitting an accurate and approved MON to OAGS in a timely manner, one that is sufficient to accommodate the respective Service Level Agreements (SLAs) posted on the FDA intranet. The coordinating CO will make all final decisions regarding the most appropriate SLA for each specific requisition.

COTRs should also use the content requirements of the AP as a reference in determining what other information and documentation is necessary to support the intended acquisition. Alternatively, Centers may prescribe use of an AP for acquisitions excepted under HHSAR 307.7101(a) (i) through (a) (viii).

4. EFFECTIVE DATE

The effective date of this guide is August 12, 2011.

5. DOCUMENT HISTORY-- SMG 2610.1, Preparing Requisitions for all Contract Actions with an Estimated Value Greater than the Simplified Acquisition Threshold

STATUS (I, R, C)	DATE APPROVED	LOCATION OF CHANGE HISTORY	CONTACT	APPROVING OFFICIAL
Initial	06/01/2009	N/a	OC/OO/OM/ OSS/OAGS	Glenda Barfell, Director - OAGS
Change	06/04/2009	Sect. 3B; Document History	OC/OO/OM/ OSS/OAGS	Glenda Barfell, Director - OAGS
Revision	08/12/2011	N/a	OC/OO/OM/ OSS/OAGS	Glenda Barfell, Director - OAGS

B.1. – MON Part I: Transmittal Form

“Source Selection Information – see FAR 2.101 and 3.104”

- To:** Insert the name of the Contracting Officer (CO), OAGS
- From:** Insert the name of the Head of the Sponsoring Program Center/Office for the project (typically a Division Director or equivalent), his/her title, and organization name
- Project Title:** Insert the full title of the proposed project or pre-existing award number

This document transmits the required Memorandum of Need (MON) for the proposed contract action. The MON consists of the following six (6) parts:

- Part I: Transmittal and Approval Form
- Part II: Summary Sheet
- Part III: Project Information
- Part IV: Clearance/Approval Checklist
- Part V: Independent Government Cost Estimate (IGCE)
- Part VI: Attachments

Signature by the Head of the Sponsoring Program Office and other MON signatories verifies that the MON has been reviewed and certifies that the MON provides all required information in the prescribed format, as well as each the following actions, if applicable and/or appropriate:

- Vague and ambiguous language has been eliminated
- A thorough technical review of the Statement of Work (SOW) has been completed
- The project is structured by phases or tasks
- Methods are available to assess the contractor's performance
- The acquisition mechanism is appropriate (i.e., the principal purpose of the project is to acquire supplies or services for the direct benefit or use of the Government)

- The planned obligation of appropriated funds for the project satisfies a bona fide need of the requiring office arising in the fiscal year for which the appropriation was made.

- For new requirements:
 - Market Research has been completed to assess the viability of procuring a Commercial Item (product or service) or Non-Developmental Item (NDI) to meet the Government's need(s), and an analysis of that research is provided as an attachment to the MON

 - The IGCE was developed independently by the requiring activity and without contribution from any interested party (including outside contractors and potential awardees). It is understood that the IGCE should not be shared with anyone outside the FDA Acquisition Team, absent the express consent of the CO

 - It is further understood that FDA employees, agents, and advisors may not disclose source selection information, proposal or bid information, or other nonpublic information, before award of a competitive procurement to which the information relates.

Program Center/Office Certification:

OFFICIAL	NAME & TITLE	SIGNATURE	DATE
Center/Office Project Officer (PO)			
PO's Immediate Supervisor			
Head of the Sponsoring Program			

B.2. – MON Part II: Summary Sheet

“Source Selection Information – see FAR 2.101 and 3.104”

1. Is this Action included in your Center’s/Office’s current Center Acquisition Plan?

Yes No If Yes, provide the **Center Item Number**: _____

If No, state the reason and status.

If the proposed contract action has an estimated value under \$100,000, state “N/A.”

2. A funding document has been submitted to OAGS through iProcurement?

Yes No If No, state the reason and status.

A funding document is not necessary when working with a CO for advance planning purposes.

3. **Accounting and Appropriation Data** for base award period:

4. Award will be **incrementally funded**?

Yes No If Yes, provide a complete explanation:

5. Estimated Contract Obligations:

If other than one-year increments, specify increments.

Year 1 (dates)	Year 2 (dates)	Year 3 (dates)	Year 4 (dates)	Year 5 (dates)	Total
\$	\$	\$	\$	\$	\$

6. Estimated Start Date: _____

Estimated Completion Date: _____

7. Are there any **urgency issues** that may impact award date and delivery/performance?

Yes No If Yes, provide a complete explanation:

8. Award will contain options?

Yes No If Yes, list the options below:

Provide a separate breakdown below for the estimated dollar amount of option periods and/or option quantities, as well as their proposed periods of performance, if applicable.

Options	Estimated Costs
	\$
	\$
	\$
	\$
	\$

9. Requirement Type:

Construction

B.3. – MON Part III: Project Information

“Source Selection Information – see FAR 2.101 and 3.104”

1. Statement of Need.

Provide a brief description of the purpose of, and need for, the proposed requirement.

2. Statement of Work (SOW)/Performance Work Statement (PWS)/Statement of Objectives (SOO).

Provide a SOW/PWS/SOO as an attachment to the MON.

3. Delivery or Performance-Period Requirements.

a. Period of Performance/Basis.

Specify the period of performance required for total performance and, if applicable, the estimated time for each phase indicated in the SOW. Describe the basis for establishing the contract/order delivery or performance period (see FAR 11.402).

b. Reporting Requirements and Deliverables.

List the technical and special reports/deliverables required (such as Earned Value Management System (EVMS) reports), including quantities needed, format, content, medium (i.e., hard copy, compact disk, etc.), addressee and address, and delivery schedule. Reporting requirements should be comprehensive and tailored to the acquisition, but not unnecessarily lengthy or detailed.

4. Sources.

Provide a list of sources, if known, that may have the requisite capabilities to satisfy the requirement. Also, describe any market research performed

(see FAR 10.002).

5. Competition.

Describe how competition will be supported and promoted in accordance with FAR 7.102 and 10.002(b) (contact your coordinating OAGS Contracting Officer / Contract Specialist prior to the submittal of your requisition package to obtain information and guidance regarding the subject FAR requirements).

Discuss the need for issuing draft solicitations and conducting pre-solicitation/pre-proposal conferences. Also, address the following items, if applicable:

a. Justification for Other than Full and Open Competition/Limited Source Justification. Provide a Justification for Other than Full and Open Competition (JOFOC) (see FAR 6.3 and HHSAR 306.3) or a Limited Source Justification (LSJ) for orders placed under GSA FSS contracts (see FAR 8.405-6) as an attachment to the MON for a proposed non-competitive acquisition. Provide either the fully executed JOFOC/LSJ or the version of the JOFOC/LSJ that the Center considers ready for submission through the OPDIV approval/signatory cycle.

b. Brand Name Justification.

Provide a Brand Name Justification (BNJ) as an attachment to the MON for a proposed brand name product (see FAR 11.105, 6.302-1(c), and 6.303). Provide the fully executed BNJ that the Center considers ready for submission through the OPDIV approval/signatory cycle.

6. Source Selection Procedures/Criteria.

List the draft technical evaluation criteria, including criteria weights or order of importance. Evaluation factors may include, but are not limited to, understanding of the problem, technical approach, experience, key personnel qualifications, and past performance (see HHSAR 315.305(a)(3)).

7. Project Advisory Group (PAG). Provide names, job titles, addresses (including e-mail), telephone numbers, respective copies of Project Officer Certifications (or other proof of equivalent training/experience), as well as qualifications of suggested PAG members or identification of the standing board/panel that will evaluate proposals. If any PAG members will be non-federal, rather than staff within the Agency or from another agency, explain why (see FAR 37.203(d), 37.204, and HHSAR 315.305(a)(3)(i)(B)(2)).

B.4. – MON Part IV: Clearance/Approval Checklist

“Source Selection Information – see FAR 2.101 and 3.104”

Indicate all pre-award clearances/approvals that apply to the project by checking the appropriate block(s), and provide the completed form as Part IV of the MON. Attach the necessary clearance/approval documentation, if available, in Part VI of the MON; otherwise, indicate when the clearance/approval will be provided. This list may not include all required clearances/approvals for a specific project. Consult OAGS for further information.

- 1. Advisory and Assistance Services for Evaluation of Proposals.**
(see FAR 37.203(d), 37.204, and HHSAR 315.305(a)(3)(i)(B)(2))
- 2. Animal Welfare.**
(see the *Public Health Service Policy on Humane Care and Use of Laboratory Animals*, Revised 1986, and HHSAR 370.401)
- 3. Contracts with Federal Employees.**
(see FAR 3.6 and HHSAR 303.6)
- 4. Equal Employment Opportunity (EEO) Clearance.**
(if known at time of submittal) (see 41 CFR 60-1.29)
- 5. Foreign Research Contracts.**
(see the Foreign Relations Authorization Act (22 U.S.C. 2656d(a))
- 6. Human Subjects.**
(see 45 CFR part 46 and HHSAR 370.301)
- 7. Project Officer Training (Basic).**
(see HHSAR 307.170 and 307.170-1)
- 8. Public Affairs Services.**
(see the HHS Public Affairs Management Manual (1986) at http://www.hhs.gov/hhsmanuals/public_affairs.pdf)
- 9. EIT.**
Approval of the OPDIV/OS Section 508 Official or designee is required when claiming an exception to Section 508 of the Rehabilitation Act (see the HHS Section 508 policy at <http://www.hhs.gov/od/508policy/index.html>).

10. Other Clearance(s)/Approval(s).

Specify the type of pre-award clearance(s)/approval(s) required and provide the necessary clearance information as part of the MON, if available; otherwise indicate when the clearance/approval will be provided.

B.5. – MON Part V: Independent Government Cost Estimate (IGCE)

“Source Selection Information – see FAR 2.101 and 3.104”

The Independent Government Cost Estimate (IGCE) must correspond to the proposed acquisition and is required as Part V of the MON. Use an IGCE format prescribed by SMG 2610.4. SMG 2610.4 may be downloaded at <http://inside.fda.gov/PolicyProcedures/StaffManualGuide/VolumeIIIGeneralAdministration/UCM007794.html>. For major capital investments, ensure that the IGCE is consistent with the budget estimates included in the current FDA business case.

The IGCE assists in analyzing the cost of individual aspects of the requirement and serves as an important basis for determining the reasonableness of an offeror's proposed costs and understanding of the solicitation. Provide all applicable information and contributing cost factors for the specific requirement where appropriate on the prescribed FDA form, including, at a minimum, all direct, indirect, and profit/fee cost factors, as applicable, including separate estimates for all performance increments, such as options and incrementally funded periods. Include both yearly sub-totals and overall requirement totals.

For projects where use of the FDA-prescribed IGCE and its cost elements are not appropriate, the Project Officer must provide other relevant information upon which the estimated total dollar amount is based (see FAR 15.404-1(b)).

NOTE: The IGCE is source selection information, and it should not be shared with anyone outside the FDA Acquisition Team, absent the express consent of the Contracting Officer. The IGCE is an internal planning document that is to be independently developed by the requiring activity. In rare and unusual circumstances, the Contracting Officer may decide that it is necessary to divulge the IGCE to all interested contractors during the solicitation phase of the procurement, or during negotiations. The Contracting Officer, however, is the only Government Official who may exercise the discretion to disclose the IGCE to anyone outside the Procurement Team.

B.6. – MON Part VI: Attachments

“Source Selection Information – see FAR 2.101 and 3.104”

List and include all attachments (i.e., Statement of Work (SOW)/Performance Work Statement (PWS)/ Statement of Objectives (SOO), Justification for Other Than Full And Open Competition (JOFOC)/Limited Source Justification (LSJ), Brand Name Justification, Quality Assurance Surveillance Plan (QASP), etc.), including their titles or other identifying information, in Part VI of the MON. Some information, depending on length, may be included in the MON rather than as an attachment.