

Year-to-Date Update

Written by Nick Sanders
Monday, 24 February 2020 00:00 -

You may want to skip this one, as it focuses on internal stuff.

For those who have chosen to remain, I wanted to discuss how the year is going so far, and what plans have been laid for 2020.

In early January I teamed with Don Acquisition to teach a class on the FAR and DFARS for people in the UK who had no idea about what the FAR and DFARS was. All they knew was that they had received subcontracts from US defense prime contractors that included lots and lots of clauses—and apparently, they were supposed to comply with requirements found in those clauses. They thought it might be nice to understand exactly what those requirements were. Thus: a four-day class in northern England. You might think January in northern England would be pretty miserable, but you'd be wrong about that. It was great. Would return in a heartbeat.

I had never experienced Don's approach to teaching before and I was impressed with it. Don also teaches the FAR Bootcamp®. As with most of the instructors who teach those classes, Don doesn't like PowerPoint slides; instead, Don likes a "hands-on" approach where every student brings a laptop and connects to the internet, and researches the clauses (and their prescriptions) individually. It worked well. We quickly realized that the client was positioned to assert commerciality, so we blocked-off most of a day to discuss the what and the how of that process. As part of the training, Don had the students look up the commercial item clauses and understand just how much of the other requirements suddenly disappeared when a commercial item determination was received.

If you are looking for similar training, I cannot over recommend Don Acquisition LLC. You will not be disappointed.

Before I left for the UK I turned in a proposed article to Karen Manos, editor of the *Government Contracts Cost, Accounting and Pricing Report*

. My article was accepted and should be published in the next 60 days. The catchy title? "Explaining the DFARS Ground and Flight Risk Clause." As I said, *catchy*

. It's not for everyone. Either you are a provider of aviation-related products and services, and you have to deal with that pesky clause, or you are not a provider and have no interest in it. For those of us who have to deal with it, the amount of ignorance on the clause's requirements

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(from both government contracting officer and contractor) is a bit startling. I thought I'd try my bit to rectify the situation. (For one example, did you know that clause contains its own cost allowability provisions?

Yep

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When I came back from the UK I was reminded that I have two textbooks to update for 2019. Most readers know I am the editor for two LexisNexis *Accounting for Government Contracts* books (

The Cost Accounting Standards

and

The Federal Acquisition Regulation

). I am just about done editing the first book, and the second one is due at the end of April.

In early April I will be speaking at the annual joint AGA/NCMA meeting in San Diego, discussing lesser-known aspects of cost reimbursement contracting. I was prompted to speak on the topic after listening to another presenter make some—how should I say?—*technical errors* on the topic. Yeah, technical errors. That's it. The kind of technical errors that forced me to walk out of the room, lest I say something impolite. (I do not like to criticize other people who are making public presentations. It's a hard thing to do and everyone who tries deserves respect. My strategy is to ask softball questions from the audience to try to get the speaker to think about what they said. Failing that, I quietly get up and exit the room. Then I walk a bit before I let out a primal scream of frustration.)

My "Financial Management of Government Contracts" class starts again in early May. That is a six-week class. I will not be there for the last week's class, because I accepted a speaking opportunity at the next ACI *Advance Forum on DCAA & DCMA Cost, Pricing, Compliance, & Audits*. The conference will be held in DC in mid-June. I responded too late to get on the fun Business Systems panel; so instead I'll be (1) leading a half-day workshop on CPSR preparation, and (2) participating on a panel discussing commercial items. I turned in my agenda for the workshop this weekend.

The year is less than three months old, but it feels like the year is a lot older than that. Reading over this blog post, I think I understand why.