

Audit Liaison Support Experience

Written by Nick Sanders

Thursday, 04 June 2009 16:23 - Last Updated Saturday, 03 March 2012 16:45

- For a fully CAS-covered aerospace/defense manufacturer, successfully led the process to obtain Government approval for fifteen simultaneous organizational and cost accounting practice changes. The effort included assessing planned changes in coordination with external Counsel, developing indirect rates (both pre- and post-change), calculating cost impacts, and revising CASB Disclosure Statements.

- Assisted a multi-billion dollar Department of Energy contractor with transition to cost-plus, CAS-covered environment, including identification of unallowable costs; compliance with FAR, CAS and TINA; preparation of indirect cost rates; and submission of initial Final Indirect Cost Rate proposal. Developed position papers for contentious issues related to restructuring costs, including accounting for mass severance and asset impairments.

- Participated in a team providing support to an independent Federal Commission in revising its labor recording and cost allocation methodology used to account for various key programs/initiatives. Resulting methodology and calculations were accepted by the Commission Inspector General and were used in preparation of Commission Financial Statements.

- For a provider of security services to the Iraqi Coalition Provisional Authority and Iraqi Reconstruction prime contractors, developed initial compliance strategy to support increased Federal oversight.

- Participated in supporting investigations of alleged False Claims Act violations and defective pricing allegations. Primary liaison with DCAA and Naval Criminal Investigative Service (NCIS)..

- Author, ["Recent Changes to FAR and CAS Affecting Government Contract Costs" \(Contract Management August 2005\)](#)

- Author, ["Recent Changes to FAR and CAS: Affects on Government Contract Cost Accounting" \(Contract Management, May 2004\)](#)

- Author, ["Preparing for Recovery Audits" \(Contract Management, Oct. 2003\)](#)

- Author, "Determining Final Costs When a Contractor Fails to Submit its Annual Indirect Cost Rate Proposal: A Proposed Alternative to the DCAA/DCMA Approach" (Federal Contracts Report, Vol. 78, No. 20).

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- Author, "Surviving Government Audits: Have the Rules of Engagement Changed?" published in Thomson-West's Government Contract Costs, Pricing and Accounting Report (March 2009).

- Moderated panel discussing "Contractor Ethics and Mandatory Disclosure" at the National Defense Industrial Association (NDIA) 2009 Annual Education Seminar.

- Principal instructor and course coordinator, "Government Contract Accounting," Federal Publication Seminars, 1999 - 2004.

- Presentation to NCMA/AGA San Diego Chapters, 2008, "Risk Management for T&M Contract Types: Addressing Regulatory and Subcontractor Issues".

- Presentation to various NCMA Chapters: "Rethinking Contract Compliance: A Roadmap Toward a 21st Century Program".

- Presentation to Institute of Management Accountants (IMA), Current Issues in Government Contracting seminar "Recent DCAA Audit Initiatives" (2000, 2001, 2003, 2005).

- Certified Government Financial Manager (CGFM), Association of Government Accountants.

- Assisted multi-national engineering and environmental remediation contractor with resolution of DCAA audit issues, including determinations of inadequacy related to Disclosure Statement, accounting system, preparation of indirect cost rates, and indirect cost allocation structure. As part of the work, took over audit liaison function with respect to interaction with DCAA and DCMA Administrative Contracting Officer. Also assessed and recommended enhancements/changes to established/disclosed cost accounting practices, policies and procedures, and internal controls.

- For an AbilityOne contractor, provided advice and assistance on transition into negotiated cost-reimbursement contracting. Efforts included development of initial cost allocation structure, identification of unallowable costs, indirect cost rate calculations, and assistance in negotiating the new methodology with DOD contracting officers. Also consulted on contract financing opportunities, cash flow enhancement, and resolution of disputes on individual contracts. Also provided support on revenue recognition issues associated with entity's external audit.

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- For a publicly traded aerospace/defense contractor, provided SME support to external audit, in connection with revenue recognition under SOP 81-1, analysis of reserves associated with DCAA audit findings and other disputes with the Government, and program management issues. Also provided training to external audit staff in the areas of revenue recognition and testing, EVMS, and applicable CAS and FAR requirements.