

# Unraveling the Incurred Cost Proposal Process

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### Incurred Cost Proposal Process and Timeline











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### Learning Objectives

- Recognize the high-level process of the Incurred Cost Proposal process including the timeline for the preparation of the ICP.
- Identify and address the details associated with the various requirements of the ICP for compliance.
- Employ the insights provided by experienced BDO professionals to assist you during your ICP preparation activities for a successful submission.





# Incurred Cost Proposal Process and Timeline





4 UNRAVELING THE INCURRED COST PROPOSAL PROCESS

# Incurred Cost Proposal (ICP) Overview

What?

- ICP schedules also support and become the Certificate of Final Indirect Costs
- ICP schedules show the detailed calculations of indirect pool(s) and base(s), as well as a summary of costs incurred by contract

When?

Per FAR 52.216-7, an Incurred Cost Proposal is due within six (6) months after the contractor's fiscal year end (FYE)

### Why?

- To establish final annual indirect cost rates and determine any over/under billing
- To demonstrate that costs are reasonable, allocable, and allowable in compliance with FAR, CAS (if applicable), and contract provisions

FAR 52.216-7: "Allowable Cost and Payment requires Government contractors to "submit an adequate final indirect cost rate proposal to the Contracting Officer (or cognizant Federal agency official) and auditor within the 6-month period following the expiration of each of its fiscal years."

### INDIRECT RATE =

Indirect Cost Pool

**Allocation Base** 

## **ICP** Timeline

### FYE DEC-23: Contracts and subcontracts with FAR 52.216-7 close the year



#### DELINQUENT SUBMISSION

Request extension in writing to CO before deadline passes

#### INITIAL SUBMISSION

JUNE-24

Contractor ICP based on Actual Costs is prepared and submitted

#### INADEQUATE SUBMISSION

Deficiency is usually due to missing information or format error

#### ADEQUATE SUBMISSION

ICP is deemed adequate and ready for audit

#### AUDIT

FAO may initiate an audit within six months of adequate submission

#### FINAL RATE DETERMINATION

All active contract billings must be updated within 60 days of final rates (per FAR 52.216-7(d)(2)(v))

# **Delinquent Submission**



- If the filing deadline cannot be met, request an extension of time in writing to DCMA, before the deadline passes if possible
- If the contractor does not submit the proposal within six (6) months of its FYE DCAA may send reminder letters to the contractor

- Once six (6) months overdue, if no extension has been granted by the DCMA ACO, the DCAA auditor may provide the DCMA ACO with unilateral rate recommendations based on either:
  - (1) a decrement factor applied to indirect rates using relevant contractor historical data or
  - (2) a company-wide decrement factor based on questioned costs at high-risk contractors applied to total contract costs, if no relevant historical data exists

- If the contractor fails to submit a completion invoice or interim adjusting rate voucher within a specified time, the ACO could potentially make a change to the contract through a unilateral modification to the contract. The key is communication with the ACO
- Rate recommendations will apply to active contracts, as well as physically complete contracts for the overdue fiscal year end

# **Initial Submission**



Per FAR 16.307, cost-reimbursement and T&M contracts should include the Allowable Cost and Payment clause (FAR 52.216-7), requiring the ICP

- Subcontractors: Refer back to your subcontract agreement for inclusion of FAR 52.216-7 which would require preparation of an Incurred Cost Proposal
- Proposed rates shall be based on the Contractor's actual cost experienced for that period
- ICP preparation is contractor's final opportunity to voluntarily disallow costs (pre-audit) that could be perceived or determined to be unallowable
- Final indirect cost rates are used in negotiating the final price of Federal contracts, requiring that indirect costs be settled before contract prices are established
- FAR 52.216-7 Allowable Cost and Payment requires Government contractors to "submit an adequate final indirect cost rate proposal to the Contracting Officer (or cognizant Federal agency official) and auditor within the 6-month period following the expiration of each of its fiscal years"

DCAAM 7641.90

VUT CODDOD ATTON		COLIMPITE A
XYZ CORPORATION ANYWHERE, USA		SCHEDULE A
SUMMARY OF ALL CLAIM FISCAL YEAR	ED INDIRECT EXPENSE R. RENDED 3/31/2009	ATES
Description	Amount	Reference
General and Administrative:		
Pool	\$271,022	Schedule B
Base	\$3,151,320	Schedule E
Claimed G&A Rate	8.60%	
Overhead:		
Pool	\$510,610	Schedule C
Base	\$656,824	Schedule E
Claimed O/H Rate	77.74%	
OccupancyExpense (Intermediate);		
Pool	\$178,083	Schedule D
Base (Square Footage)	18,492	Schedule D
Claimed Rate (per Sq. Ft.)	\$9.63	
Cost of Money Overhead:		
COMFor period	\$10,235	Schedule F
Allocation Base O'H COMFactor	<u></u>	
Cost of Money G&A:		
COMFor period	\$2,101	Schedule F
Allocation Base 3&A COM Factor	\$3,151,320 0,00067	

#### Source:

https://www.dcaa.mil/Portals/88/Documents/Checklists%20and %20Tools/ICE/DCAAM\_7641.90.pdf?ver=2019-03-07-153300-960

# Inadequate Submission

### DEFICIENCY

Unallowable expense accounts/amounts are not identified as a reduction or adjustment to booked indirect expenses shown in the GL

#### ISSUE

On Schedule B for G&A, you didn't include all the unallowable accounts into the G&A pool in the first column, and then complete the "adjustment" column to back it all out in the third column

#### DEFICIENCY

Contract Ceilings are not listed on Schedule I

#### ISSUE

There isn't a column called Contract Ceiling on Schedule I. Completing the Contract Briefs in Schedule O (typically for closeout), drives a need to add a column on Schedule I for contract values



### DEFICIENCY

For Schedule I, identify whether the listed contract is subject to the penalty clause

#### ISSUE

On Schedule I, you must note whether your contract is subject to the penalty clause.This response will be yes if your contract contains FAR clause at 52.242-3, Penalties for Unallowable Costs

# Adequate Submission



#### An adequate Incurred Cost Proposal will first be reviewed for:

- Schedule N is signed by an authorized party (usually CFO or above)
- Costs are reasonable, allocable, and allowable in accordance with GAAP, CAS, FAR, and contract provisions, as applicable
- Identification, by contract, of awards containing FAR 52.242 3 - Penalties for Unallowable Costs (penalty clause)

- A contractor's submission of all claimed costs incurred for cost type and/or T&M reimbursable government contracts, including adjustments and explanatory notes
- Identification of unallowable costs (voluntary deletions) and expressly unallowable costs with notes accompanying adjustments

### **Required Schedules:**

- A-F for Indirect Cost Pools
- ► G-K for Contract Costs
- L-O for Other Contract Information

**DCAA Checklist and Tools** 

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# Audit

### **DCAA Audit Objectives:**

- Evaluate adequacy and compliance
- Assess if Cost Incurred and Claimed are:
  - Reasonable
  - Allocable
  - Allowable
- Obtain sufficient understanding of audit area
- Ensure contract or regulatory limitations or exclusions are reflected

- Confirm there is no unreasonable executive compensation
- Document test findings in working papers and permanent file
- Examine and document sufficient evidence to support an opinion

Compensation Cap Amounts for Contracts Awarded on or After June 24, 2014

For Costs Incurred	Escalation <sup>1</sup>	Cap Amount <sup>2</sup>
1/1/2024-12/31/24	4.3%	\$646,000
1/1/2023-12/31/23	5.0%	\$619,000
1/1/2022-12/31/22	3.7%	\$589,000
1/1/2021-12/31/21	2.4%	\$568,000



Executive Compensation Calculation

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# **Final Rule Determination**

- Per FAR 33.211, any appeal to the Contracting Officer's Final Decision (COFD) must be submitted in writing within 90 days of receiving decision
- Final indirect rate billings for physically complete contracts are due within 120 days after settlement
- Negotiated or audit determined final rates are used for:
  - Billing updates (impact differences in provisional rates)
  - Contract close out (completion voucher)
  - Determination of final incentive/award fees

	Figure 9.	Same	le of SE 1025 C	ompletion Voucho			DCAAM 7641.90
Standard For	<u>Figure 9.</u> rm 1035 (EG)			Completion Vouche		YOUCH	er No.
Standard Foi Septemb		FUBLIC VUUCH	THAN PER	(b) 30	Z		
4 Treasury			CONTINUATI				ULE NO.
1035	5-110					(C) SHEET	100
						(d)	NU.
		RESTABLISHMENT				(4)	
		r, San Diego, CA					
NUMBER AND	DATE OF DELIVERY OR	ARTICLES OR (Enter description, item		QUAN- TITY	UNIT PRICE		AMOUNT
ORDER	SERVICE	or Federal supply sch			COST	PER	
(e) XYZ Corpo	YZ Corporation (f) Contract No. I			1-C-091			
200 Euclid St	treet			(g) Target Estimate	ed Costs	1	\$400,000
Tampa, FL 20	0005	(h) Contractor's Cu		(g) Fixed Fees		1	\$36,000
		Reconciliation		(g) Total			\$436,000
				37		(k)	Total
(j) Final Rate	5	FY87	FY88	FY89			
Fringe Benefi		10.93%	12 15%	13.33%			
Overhead Rat		112,99%	92.30%	92.12%			
	.e						
G&A Rate		2.91%	14.97%	12.33%			
(i) Major Cos	Elements	<u>FY87</u>	<u>FY88</u>	<u>FY89</u>			
Salaries		\$115,572.17	\$16,068.11	\$3,033.44			\$134,673.7
Fringe Benefi	ts	\$12,632.04	\$1,952.28	\$404.36			\$14,988.6
Total Direct L	abor	\$128,204.21	\$18,020.39	\$3,437.80			\$149,662.4
Overhead		\$144,857.93	\$16,632.82	\$3,166.90			\$164,657.6
Material		\$2,242.16					\$2,242.1
Subcontract		\$62,351.00					\$62,351.0
Travel		\$4,193.94	\$297.76				\$4,491.7
Consultants		\$1.071.76					\$1.071.7
Other Direct	Costs	\$770.10	\$8.34	\$9.00			\$787.4
Subtotal		\$343,691,10	\$34,959,31	\$6.613.70			\$385,264.1
G&A		\$10.001.41	\$5,233,41	\$815.47			\$16,050.2
Total Costs Ind	urred	\$353,692.51	\$40,192.72	\$7.429.17			\$401,314.4
	Excess of Cor		ψ <del>4</del> 0,152.72	φι,423.11			(1,314.41
(I) Total Cost							\$400,000.0
							L
(m) Fixed Fe	e						\$36,000.0
(n) Total							\$436,000.0
(o) Less Prev	ious						(433,871.23
Amount Due						(p)	\$2,128.7

Source:

https://www.dcaa.mil/Portals/88/Documents/Checklists%20and%2 0Tools/ICE/DCAAM\_7641.90.pdf?ver=2019-03-07-153300-960



# **ICP** Schedules





# **ICP** Schedules

#### **REQUIRED SCHEDULES**

- To be completed and provided to DCAA at the time of submission, if applicable
- Some schedules, while identified as required, do not have to be completed if the schedule does not apply to the company (i.e., Capital Cost of Money, Intermediate Schedules)
- Schedules include A E, \*Fringe (or Schedule D), F-O

#### SUPPLEMENTAL SCHEDULES

- Additional schedules which are not required to be provided at the time of submission for the determination of an adequate submission
  - However, may be required during the audit process.
- Can be requested to be provided at the entrance conference to help determine audit risk, preliminary and field audit steps
- Federal contractors should consider completing and including the supplemental schedules at the time of submission to decrease delays in facilitating the audit.
- Schedules include Supplemental A O

# ICP Schedules Flowchart



Flow Chart Showing Linkages Between and Among the Various Worksheets

Source: ICE Demo (2.0.1h).xlsm https://www.dcaa.mil/Checklists-Tools/ICE-Model/

# **ICP Schedule A**

#### Schedule A: Summary of all Claimed Indirect Expense Rates

- This schedule shows each Indirect Rate with cost and base amounts
- Schedule A must tie to:
  - B: G&A Expenses (final)
  - C: Overhead Expenses (final)
  - D: Intermediate/Occupancy Expenses
  - E: Claimed Allocation Bases
  - \*Fringe Schedule of Fringe Benefit Expenses
  - F: Facilities Capital Cost of Money (FCCM)
  - H: Direct Costs by Contract/Subcontract

Recondilation of ICS Rates between Schedules FY2016



# **ICP Schedule B**

#### Schedule B: G&A Expenses (Final)

- G&A costs broken down by account name and number (before intermediate allocations)
- Any intermediate allocation amounts from Service Center, Home Office, Fringe, etc.
- IR&D and B&P costs broken out separately into Labor, Fringe, Overhead, and ODC's
- ► Total expense pool amount.
- All unallowable costs should be deducted out in the adjustments column in the schedule

Schedule B is linked to the following schedules: Sched D (x), Intermediate Allocations	XYZ Corporation Anywhere, USA	SCHEDULE B ICE (version 2.0.1h)
Sched E, Bases		
Sched H, Contract Costs	General and Administrative (G&A) Expenses (Final Indirect Cost Pool)	
Summary Sch H	General and Administrative (G&A) Expenses	
Sched P, IR&D/B&P	Fiscal Year End - 3/31/2009	
ICE MANUAL	IMPORT DATA FROM ACCOUNTING RECORDS	

#### RECHECK FORMULAS AND LINKS AFTER COMPLETING SCHEDULE

COUNT	Α	loct Balances		TOTAL PER GIL, FIS				
MBER DESCRIPTION	Mkt	Cont	Pres	& TRIAL BAL.	ADJUSTMENT	CLAIMED	NOTES	Reference
8310 Salaries & Wages	25,202	30,602	34,203	90,007		90,007	1	
8320 Legal Fees		1,744		1,744		1,744		
8330 Audit Fees		32,361		32,361		32,361		
8501 Travel	3,636	2,082	7,269	12,987	(1,295)	11,692	2	
8503 Entertainment	300		184	484	(484)	-	3	
8505 Advertising & Promotion	354			354	(287)	67	4	
8522 Bad Debts		3,018		3,018	(3,018)	_	5	
8520 Periodicals	2.882	1.678	1,875	6,435		6,435	-	
8523 Conventions/Seminars	4,920		3,016	7,936	(319)	7,617	4	
8527 Interest Expense	1,020	1.001	0,0,0	1.001	(1,001)	-	6	
8528 Holiday	650	789	882	2,321	(0000)	2,321	Ť	
8540 Vacation	1.627	1,976	2,209	5,812		5,812		
8530 Sick Leave	276	336	375	987		987		
8531 Personal Absence	303	368	411	1,082		1,082		
8532 Employee FICA	1.068	1,297	1,450	3,815		3,815		
8535 FUI	51	62	1,430 70	183		183		
8536 SUI	255	309	70 346	910		910		
	255 144	175	346 196	510		515		
8537 Workers' Compensation								
8549 Health Insurance	2,495	3,030	3,387	8,912		8,912		
8550 Life Insurance	304	370	413	1,087	(1.000)	1,087	_	
8551 Pension Plan	3,449	4,188	4,681	12,318	(1,883)	10,435	7	
8552 Miscellaneous	940	1,488	929	3,357		3,357		
				-		-		
				-		-		
				_		_		
SUBTOTAL	48,856	86,874	61,896	197,626	(8,287)	189,339		
ermediate Allocations:							-	
	5,085	6,269	11,797	23,151	-	23,151		Sched D (1)
SUBTOTAL	53,941	93,143	73,693	220,777	(8,287)	212,490		
IR & D Mat'l, Tryl, ODC(Sum SCH H)				9,724		9,724		SUM SCHED H
IR & D Labor (Sum SCH H)				14,287		14,287		SUM SCHED H
IR & D Overhead(Sum SCH H & SCH E)				11,822	(715)	11,107		SUM SCHED H
B&PMat'l.Tryl. ODC(Sum SCHH)				6,485	(110)	6,485		SUM SCHED H
B&PLabor (Sum SCHH)				9,525		9,525		SUM SCHED H
B & P Overhead(Sum SCH H & SCH E)				7,882	(477)	7,405		SUM SCHED H
D & F Overhead(Sum Sch H & Sch E)				1,002	(411)	1,403	0	
TOTAL G & A EXPENSE POOL				280,502	(9,479)	271,023		

Source: ICE Demo (2.0.1h).xlsm https://www.dcaa.mil/Checklists-Tools/ICE-Model/

# ICP Schedule C

# Schedule C: Overhead Expenses (Final)

- Calculates overhead expenses, those costs that are closely associated with contract performance:
  - Support functions for direct labor workforce
- Schedule includes details of costs by account name and number (before intermediate allocations):
  - One schedule per O/H Pool (e.g., Manufacturing, Engineering, Onsite, Offsite, FCCOM)
  - Any intermediate allocation amounts from Service Center, Fringe, etc.



#### RECHECK FORMULAS AND LINKS AFTER COMPLETING SCHEDULE

CCOUNT	-	Acet	Balances		OTAL PER G/	L		
NUMBER	DESCRIPTION	Fab	Assy	Mfg		DJUSTMENT:	CLAIMED	Notes Ref.
7001	Salaries & Wages	13,885	13,224	5,951	33,060		33,060	
7002	Postage & Handling	2,619	2,494	1,122	6,235		6,235	
7003	Office Supplies	2,714	2,584	1,163	6,461		6,461	
7013	Dues/Memberships	587	545	980	2,112	(500)	1,612	2
7014	Insurance	310	295	133	738		738	
7015	Depreciation/Amortization	1,186	1,130	508	2,824		2,824	
7016	Repairs/Maintenance	706	672	303	1,681		1,681	
8421	Holiday	8,476	8,072	3,633	20,181		20,181	
8422	Vacation	10,685	10,176	4,579	25,440		25,440	
8423	Sick Leave	6,014	5,727	2,577	14,318		14,318	
8425	Severance Pay	13,616	12,968	5,835	32,419	(23,023)	9,396	3
8427	Employer FICA	9,917	9,445	4,250	23,612		23,612	
8429	FUI	508	484	218	1,210		1,210	
8430	SUI	2,441	2,325	1,046	5,812		5,812	
8431	Workers' Compensation	1,391	1,324	596	3,311		3,311	
8435	Health Insurance	13,061	12,439	5,597	31,097		31,097	
8440	Life Insurance	2,870	2,733	1,230	6,833		6,833	
8445	Pension Plan	24,494	23,328	10,498	58,320	(8,612)	49,708	4
8450	Miscellaneous	257	245	110	612		612	
	Subtotal	162,910	155,135	70,545		(32,912)	355,678	
	Jubrolai	102,010	100,100	10,040	000,000	(32,312)	333,010	1
	Occupancy	80,557	46,428	27,947	154,932	-	154,932	Sched D (1)
	Total Overhead Pool				543,522	(32,912)	510,610	

# ICP Schedule D

Schedule D: Intermediate / Occupancy Expenses

- Schedule must include an allocation table providing:
  - Allocation base by recipient (i.e., direct labor, overhead, G&A, subcontract costs)
  - Percentage of the total base for each recipient
  - Total dollars allocated to each recipient
  - Fringe pools will be filled out like an intermediate/ occupancy expense pool



# ICP Schedule E

#### Schedule E: Claimed Allocation Bases

- Calculates the allocation bases for all final indirect pools
- Schedule A should reference base amounts included on Schedule E
- Adjustments should be thoroughly explained via footnotes
- Allocation bases for intermediate pools are sometimes incorporated as well
- Example allocations bases include:
  - G&A
  - Subcontracts and Material Handling (SM&H)
  - Overhead
  - Fringe: total labor, FTE, headcount
  - Facilities

	PER G/L, F/S & TRIAL BAL/FS		PER G/L USTMENTS	CLA	IMED	Ref.
Overhead Pool	\$ 543,52	2 \$	(32,912)	s	510,610	Sched C (1)
<b>Overhead Base:</b>						
Total Contract Labor	\$ 633,01	2		s	633,012	Summary Sched H
IR&D Labor	14,28	7			14,287	Summary Sched I
B&P Labor	9,52	5			9,525	
<b>Total Overhead Base</b>	\$ 656,82	4 S		\$	656,824	
Overhead Rate	82.75	%			77.74%	
G&A Pool	\$ 280,50	2 \$	(9,479)	s	271,023	Sched_B
G&A Base: Contract Labor					(22.012	e
Contract Labor Contract Travel				s	633,012 34,563	Summary Sched I
Contract Travel Contract Material					842,981	Summary Sched
Other Direct Costs					172,105	Summary Sched I
Subcontracts					944,841	Summary Sched I Summary Sched I
Subtotal = DIRECT COS	TS			\$	2,627,502	Summary Sched I
General Ledger Overhead (be					543,522	Sched C (1)
Less: IR&D/B&P O/H transf	ferred to G & A pool.					COURS B
IR &D O/H (at G/L rate)					(11,822)	SCHED B
B&P O/H (at G/L rate)	A Days (annully days)				(7,882)	SCHED B
Other Misc Adjustments to				s	3,151,320	
G&A Base - Total Cost Inp	ut (extudes iK&D/B&P	and COX		ş	5,151,520	

# ICP Schedule F

Schedule F: Facilities Capital Cost of Money (FCCM)

- The cost of money is considered an allowable cost under FAR
- FCCM provides the government with a breakdown about financing costs the contractor has incurred
- Uses the weighted average cost of capital

Computing C	OM Rate:		
	Treasury		
	Rate	Mos.	COM Rate
Apr - Jun 08	4.750%	3.00	1.188%
Jul - Dec 08	5.125%	6.00	2.563%
Jan - Mar 09	5.625%	3.00	1.406%
			5.157%
Months percen		- 4	

adjust as needed

		<ol> <li>Applicable</li> </ol>	2. Accumulation	<ol><li>Allocation of</li></ol>	<ol><li>Total Net</li></ol>	5. COM for Cos	<ol><li>Allocation</li></ol>	7. Facilities
Company 1		Cost of Money	& Distribution of	Undistributed	Book Value	Accounting	Base For	Capital CON
Cost Accountin	ng Period 20xx	Rate	NBV			Period	Period	Factors
	Recorded	5.16%	69,761	(Basis Of Allocation)	(Column 2+3)	(Column 1*4)	In units	(Column 5/6
Business	Leased Property		162,290	1			of measure	
Unit	Corporate/Group						(Note 1)	
Facilities	Total		232,051	1				
Capital	Undistributed		193,290	1				
-	Distributed		38,761	1				
			¥	· 🖌				
Overhead	Cost of Money Ove	erhead	30,345	168,162	198,507	10,237	656,824	0.0155
Pools	Unused		-	-	-	-	-	0.0000
	LESS: COM on IR&	D/B&P Labor:						
	Cost of Money Ove	erhead				(371)	(23,812)	0.0155
	Unused					-	-	0.0000
	Subtotal					9,866		
G&A	G & A		8,416	25,128	33,544	1,730		
Expense Pools	ADD: COM on IRA	&D/B&P Labor				371		
_	Subtotal:					2,101	3,151,320	0.0006
TOTAL			38,761	193,290	232,051	11,967		

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# ICP Schedule G

Schedule G: Reconciliation of General Ledger / Trial Balance to Claim

- Booked and Claimed Direct Costs
- Any adjustments to Direct Costs are shown here

DESCRIPTION *	AMOUNT PER GENERAL LEDGER *	ADJUSTMENTS	AMOUNT	Ref.
Direct Labor	656,824		656,824	Summary Sch H
Travel	35,173	(1,687)	33,486	Summary Sch H
Material	843,192		843,192	Summary Sch H
Other Direct Cost	187,493	(3,183)	184,310	Summary Sch H
Subcontracts	944,841		944,841	Summary Sch H
TOTAL DIRECT COSTS	2,667,523	(4,870)	2,662,653	

\* Includes IR&D/B&P direct costs

## **ICP** Schedule H

#### Schedule H: Direct Costs by Contract/Subcontract

- Indirect rates (as calculated in Schedule A) are applied to the direct contract costs to determine the total direct and indirect expenses for each contract
- Best Practices:
  - Include federal agency/customer name, by award
  - Differentiate between claimed and unclaimed (non-billable) direct costs by cost element and applied indirect costs
  - Reconcile total costs incurred on Schedule H to Trial Balance or detailed General Ledger
  - Calculate indirect rate caps on this schedule for greatest efficiency and easy linkage to Schedule I

ABC, LLC. Anywhere, VA FISCAL YEAR ENDED 12/31/14 SCHEDULE OF DIRECT COSTS BV CONTRACT/SUBCONTRACT AND INDIRECT EXPENSE APPLIED AT CLAIMED RATES

												Sch. A	Sch. A		Sch. A		Sch. A	
												20.56%	15.45%		8.35%		4.56%	
Award Type	Customer	Project	Project	Contract	Subcontract No.	Direct	Travel	ODCs	Total Direct	Materials	Subcontracts	Allowable	Allowable	Value Add	G&A	Total	M& S	Grand
	Name	No.	Name	No.		Labor			Costs -			Fringe	Overhead	Direct Costs		M&S	Handling	Total
									Value Add					Plus Fringe &				
														он				
COST TYPE																		
CPAF	(Agency)	100	ABC	ABC-123-000		3,255	5,554	6,644	15,453	-	-	669	606	16,729	1,397	-	-	18,125
CPFF	(Agency)	101	DEF	ABC-234-000	STU	4,523	4,344	55,533	64,400	4,663,000	344,422	930	842	66,172	24,592	5,007,422	228,338	5,326,525
COST TYPE TOTAL						7,778	9,898	62,177	79,853	4,663,000	344,422	1,599	1,449	82,901	25,988	5,007,422	228,338	5,344,650
T& M	(Agency)	200	GHI	CDE-456-000	VWX	345,435	43,533	6,332	395,300	-	553,322	71,021	64,343	530,664	46,417	553,322	25,231	1,155,635
T& M TOTAL						345,435	43,533	6,332	395,300	-	553,322	71,021	64,343	530,664	46,417	553,322	25,231	1,155,635
Fixed Price	(Agency)	300	JKL	EFG-678-000		15,345	2,567	664	18,576	55,633	-	3,155	2,858	24,589	2,265	55,633	2,537	85,024
FIXED PRICE TOTAL	_					15.345	2.567	664	18.576	55.633		3.155	2,858	24.589	2.265	55.633	2.537	85.024
COMMERCIAL		500	MNO	HJ-932-029		125,555	13,000	1,409	139,964	-	-	25,814	23,387	189,165	15,795	-	-	204,960
IR&D/B&P		900	PQR			34,229	986	283	35,498	•	-	7,037	6,376	48,911	-	-	-	48,911
GRAND TOTAL						528,342	69,984	70,865	669,191	4,718,633	897,744	108,627	98,412	876,230	90,466	5,616,377	256,107	6,839,180
										L			Sch.C		Sch. B		Sch. C-1	

5,616,377

Sch. E- Mat. & Sub Handling

SCHEDULE H

# **ICP Schedule H1**

#### Schedule H: Direct Costs By Contract/Subcontract

- Government Participation by Contract type will be tested in the audit context
- The percentage of government participation in the allocation bases of various indirect rates will impact the amount of questioned costs identified in an audit. Questioned indirect costs will be calculated against the government participation associated with flexibly priced contracts will require reimbursement to the government. (i.e., questioned indirect costs may not need to be reimbursed dollar for dollar)

Schedule H-1 is link	ed to the following so	hedules:		Schedule H-1	
Schedule H, Contra	ct Costs			ICE (version	2.0.1e)
ICE MANUAL					
	Т	om Tagle LLC			
	W	Vest Coast, USA	L		
	Subs	sidiary Schedul	e of		
	Government	t Participation P	ercentages		
		Year End - 12/3	-		
	Overh	ead			
	Overhead		G&A		
Contract Type	<b>Base Amount</b>	<u>%</u>	Base Amount	%	Ref.
Cost-Type	20,563,815	93.4%	64,207,748	95.5%	SCHED H
Flexibly Priced	-	0.0%	-	0.0%	"
T&M	248,971	1.1%	472,193	0.7%	"
Fixed Price	393,607	1.8%	2,567,731	3.8%	"
Commercial	-	0.0%	-	0.0%	"
IR&D/B&P	814,489	3.7%	-	0.0%	"
Unbillable			17,948	0.0%	"
Total	22,020,882	100.0%	67,265,621	100.0%	

Source: ICE Demo (2.0.1h).xlsm https://www.dcaa.mil/Checklists-Tools/ICE-Model/

# **ICP** Schedule I

#### Schedule I: Cumulative Direct and Indirect Costs Claimed and Billed

- Determine costs claimed versus those billed for all Federal cost reimbursement and T&M awards (subcontracts are traditionally included)
- All cost reimbursement and T&M contracts are identified separately on schedule and should be sorted by Federal Agency
- Current year claimed costs must be linked from Schedule H and Schedule K and added to prior year settled/claimed costs
- Include contract limitations to prevent overstating claimed costs



# **ICP** Schedule J

#### Schedule J: Subcontractor Information

- Identify subcontracts you have awarded to companies for which you are the prime or upper-tier contractor for a cost-type contract, including inter-divisional effort(s)
- Information that must be included:
  - Subcontract number, name and address
  - Prime contract number
  - Subcontractor point of contact and phone number
  - Total value of subcontract
  - Costs incurred in that fiscal year
  - Award type

		SUBCONTRACTOR'S	POINT OF CONTACT	SUBCONTRACT	Performa	nce Period	INCURRED	AWARD
SUBCONTRACT NO.	PRIME CONTRACT NO.	NAME & ADDRESS	AND PHONE NO.	VALUE	From	To	IN FY 2009	TYPE
P.O. #XYZ0998R	N00039-05-C-0873	Small Company 1445 Southpark Blvd. Buffalo, NY 14206	Ms. Donna Charleston Marketing Manager (716) 883-8700 X317	\$110,500	3/16/2006	6/30/2009	\$87,912	CPFF
P.O. #XYZ0776R	N00040-05-C-0874	Tanza Enterprises 87B Executive Park Fairfax, VA 22033	Mr. Mike Tanza President (703) 983-5640	\$895,000	4/20/2006	12/2//2010	\$15,341	CPFF
P.O. #XYZ01032R	Subcontract to Clark Inc. Prime N00039-05-C-0875	Argonautics, Inc. 555 Ocean Parkway Anaheim, CA 92803	Mr. Ted Kessel Marketing Manager (714) 998-2000 X12	\$152,500	7/25/2008	10/16/2011	\$7,888	CPFF

#### Cost-type subcontracts issued under flexibly priced prime contracts: Yes X No

Source: DCAA Manual 7641.90 - Information for Contractors

# ICP Schedule K

Schedule K: Summary of Hours and Amounts on Time and Material (T&M) / Labor Hour

- Schedule K Best Practice
  - All contracts identified as T&M on Schedule H should be reported on Schedule K
  - ODCs and Travel costs must tie to Schedule H
  - Material and travel costs should be added and loaded with the claimed G&A rate, if applicable
  - Details should be in the same level used for billing

Contract Labor Category (1)	Contract No. <u>N00022-96-D-0111</u> Task: <sup>7</sup> 001		Contract No. <u>N00022-96-D-0111</u> Task: 002					
LABOR	Ba	ate (2)	Hrs	Amount	Bate (2)	Hrs	Amount	
Program Manager	\$	25.00	100	2,500	\$25.00	50	1,250	
Senior Engineer	\$	20.00	100	2,000	\$17.50	100	1,750	
Engineer	\$	15.00	200	3,000	\$12.50	100	1,250	
Analyst	\$	12.50	100	1,250	\$12.50	-	-	
<b>Technical Typist</b>	\$	7.00	50	350	\$7.00	_100	700	
TOTAL			550	9,100		350	4,950	
OTHER COSTS Material Costs (3) Travel Costs (3)				1,000 382			500 421	
<b>C1 1 0</b>	<u>Sc</u>	hed A 8.60%		110			70	
G&A @: Subtotal		0.60%	(4) -	<u>119</u> 1,501		_	<u>79</u> 1,000	
TOTAL				10,601		_	5,950	
Task Ceilings				25,000		_	12,500	

#### **Explanatory Notes**

(1) Represents effort performed by the company. Any subcontract effort should be identified separately.

- (2) Represents rates specified in the contract which may be higher or lower than actual rates incurred.
- (3) Represents actual costs recorded in the cost records.

(4) G&A applied at the claimed rate to Material (if not Value-added base) and Travel Costs.

# ICP Schedule L

Schedule L: Reconciliation of Total Payroll to Total Labor Distributed

- Salary and Wages reported on Schedule L must reconcile to corresponding pools
- Payroll information should be entered directly from Form 941
- Labor distribution information is entered using links from schedule H (for direct labor) and schedules B, C, and D (indirect labor expenses)
- Total 941 amount needs to reconcile to the labor totals from the rest of the ICP
- Acceptable variance regarded as "immaterial" varies depending on auditor judgment

Acct No.	Description	General Ledger	Reference
ACCUNO.	Direct Labor:	<u>656,824</u>	
	Direct Labor:	000,024	Summary SCHED H
	General & Administrative:		SCHED B
8310	Salaries	90,007	
8528	Holiday Wages	2,321	
8540	Vacation Wages	5,812	
8530	SickLeave	987	
8531	Personal Absence	1,082	
	Overhead Pools:		SCHED C (x)
7001	Wages	33,060	
8421	-	20,181	
8422	· =	25,440	
8423	Sick Leave	14,318	
8425	Severance Pay (in full)	32,419	
	Intermediate Pools:		SCHED D (x)
	Occupancy Wages	23,280	
	Overtime Premium (in ODCs)	270	
	Overtime Premium	-	
	Other Adjustment to arrive at Total Payroll Distributed (Provide detailed support)	-	
	TOTAL LABOR DISTRIBUTION	906,001	
		PER IRS	
		FORM 941	
	1ST QTB.	228,479	
	2ND QTR	228,236	
	3rd QTR.	237,206	
	4th QTB.	220,167	
	Plus: Current Year Accrual	15,128	
	Minus: Prior Year Accrual	(33,214)	
	Other Adjustments	9,999	
	TOTAL PAYBOLL	906,001	

# ICP Schedule M

Schedule M: Listing of Decisions / Agreements / Approvals & Description of Accounting / Organizational Changes

- Refer to memorandums issued by Administrative Contracting Officers and disclosure of any accounting or organizational changes
- Contractors using a blending of compensation caps in accordance with FAR 31.205-6(p) are required to enter into an advance agreement with the cognizant contracting officer
- Advance Agreements regarding certain cost elements or costs incurred in certain circumstances should be included on Schedule M

#### SCHEDULE M ICE MANUAL ICE (version 2.0.1h) XYZ Corporation Anywhere, USA Listing of Decisions/Agreements, or Approvals Affecting Direct/Indirect Cost And Description of Accounting or Organization Changes Fiscal Year End - 3/31/2009 Please provide copies of documents or a reference to where they are filed. A. Decisions/Agreements or Approvals 1. Severance Pay - (Schedule C) Reference ACO letter of 30 July 2008 regarding Severance Pay and Relocation Expenses of terminated employees. 2. Pension Plan - (Schedules B & C) Reference ACO memorandum of negotiations of 10 August 2008 (FY 2009 Overhead) which sets forth pension plan rates, vacation approvals, and certain other matters. B&P Ceiling - Included in ACO memorandum of negotiations discussed in 2. (above). Billing Rates - ACO letter of 3 March 2008 setting forth approved billing rate for FY 2009. Salary Approval - ACO letter of 19 June 2008 approving salaries of top management. 6. Ceiling Rates - Contract No. N00039-90-C-0873 provides for a ceiling on overhead and G&A rates of 80% and 10% respectively. The claimed rates for FY 2009 are less than the ceiling rates. Provide contract reference to ceiling B. Accounting or Organization Changes During January 2009, a redirection of Contract No. N00060-09-C-0914 occurred. The PCO directed the stretching of this program into the future.

rate.

Source: ICE Demo (2.0.1h).xlsm https://www.dcaa.mil/Checklists-Tools/ICE-Model/

# **ICP Schedule N**

#### Schedule N: Indirect Cost Certification

- Should be signed by an authorized party (usually CFO or above)
- The contractor should complete this form, scan the signed certificate and submit it with the Incurred Cost Proposal
- The contractor must maintain the hard copy original signed certificate for the auditor's examination
- A signed Indirect Cost Certificate is required by FAR 52.242-4

#### ICE MANUAL SCHEDULE N ICE (version 2.0.1h) XYZ Corporation Anywhere, USA Certificate of Final Indirect Costs Fiscal Year End - 3/31/2009 This is to certify that I have reviewed this proposal to establish final indirect cost rates and to the best of my knowledge and belief: 1. All costs included in the proposal <u>fidentify proposal and</u> datel to establish final indirect cost rates for <u>fidentify period covered by rate)</u> are allowable in accordance with the cost principles of the Federal Acquisition Regulation (FAR) and its supplements applicable to the contracts to which the final indirect cost rates will apply; and 2. This proposal does not include any costs which are expressly unallowable under applicable cost principles of the FAR or its supplements. Firm: Signature:\_ Name of Certifying Official: Title: Date of Execution:

FAR Part 52.242-4-- Certification of Final Indirect Costs.

As prescribed in 42.703-2(f), insert the following clause: Certification of Final Indirect Costs (Jan 1997) (a) The Contractor shall --

# ICP Schedule O

#### Schedule O: Contract Closing Information for Contracts Completed in This Fiscal Year

- Contract Closing Information
- Use only for contracts 'physically' completed the fiscal year of ICP
- Includes the following information on each closed contract, broken out by contract type:
  - Contract Number
  - Performance Period
  - Whether or not it is ready to close
  - Contract ceiling amount
  - Contract fee
  - Level of Effort cumulative hours, actual and required

		Performan	ce Period	Ready To	Contract Ceiling		Level of Cumulative		
Contract No.	<u>Order No.</u>	Erom	Ιo	Close(1)	Amount (2)	<u>Fee(3)</u>	Required	Actual	Notes
Cost Type:	_								
Subcontract-Clark Inc.		2/16/05	2/28/09	Yes	1,000,000	60,000	15,000	14,588	
N00060-95-C-0913	-	10/16/06	12/28/08	Yes	1,750,000	112,000	27,500	28,950	
Time & Material N00022-96-D-0111	001	7/1/06	12/31/08	Yes	25,000				

#### Preparation Notes:

(1) Indicate whether the contract is ready to close based on all information available. If the contract is not ready to close (e.g., a contract modification is being pursued), the reasons why should be stated in a footnote:

(2) Provide the overall contract ceiling amount before fee, for the type of contract.

(3) Provide fee amount as provided by the contract. Include details of the fee computation for all flexibly priced incentive fee and level of effort type contracts, along with the contract modification used, in a footnote.

Source: ICE Demo (2.0.1h).xlsm https://www.dcaa.mil/Checklists-Tools/ICE-Model/

# The Audit Participants (for DOD)

### DCAA (Defense Contract Audit Agency):

- Audit Incurred Cost Proposal
- Assist Audit of another contractor or subcontractor
- Provide letter from audit to DCMA

### DCMA Contracting Officers (COs):

- Establish Final Indirect Cost Rates
- Disallow costs were applicable
- Make penalty assessments where applicable
- Accept rates as proposed if a contractor is deemed to be low risk and if the ICP has passed the DCAA adequacy review



# Leveraging Independent Auditors (IPAs) for DCAA Audits

- Increase in use of 3rd Party Independent Public Auditors performing DCAA type audits
- DCAA is recommended to use IPAs to meet time limits
  - High number of incurred cost audit backlog
  - Primary delay is for DCAA staff to begin audit work
  - When specialized knowledge is needed
- Other federal agencies have been utilizing IPAs
  - NASA
  - DOE



# The Audit Risk

- The Level of Audit Oversight is Dependent upon:
  - Contract Type
  - FFP/T&M = Low risk, low audit risk

RISK

COMPLIANCE

- Cost Reimbursable = Higher risk, high audit risk
- Method of Procurement:
  - Commercial Item = lowest degree of audit risk
  - Competition = fewer audit requirements
  - Negotiated = increased audit oversight



#### **COMPLEXITY RISK**

# Speaking the Language

DoD:	Department of Defense	ERP:	Enterprise Resource Planning		
GAGAS:	Generally Accepted Government Auditing Standards (Yellow Book)	DFARS:	Defense Federal Acquisition Regulation Supplement		
CMMC:	Cybersecurity Maturity Model Certification	ICP:	Incurred Cost Proposal		
CFY:	Current Fiscal Year	FAR	Federal Acquisition Regulation		



#### **KEYS TO SUCCESS:**

- Learn the acronyms.
- Interface with auditors before, during and after an audit.
- Insist on formal kick-off and exit audit meetings - required by GAGAS.
- Keep a log of everything provided to auditors.
- Ensure any responses to audit findings are incorporated into the Final Report.

# **Regulatory Guidance**



- CAS 401: Consistency in Estimating, Accumulating and Reporting costs
- CAS 402: Consistency in Allocating costs Incurred for the same Purpose
- CAS 403: Allocation of Home Office Expenses
- CAS 405: Accounting for Unallowable Costs
- CAS 406: Cost Accounting Period
- CAS 410: Allocation of Business Unit G&A to Final Cost Objectives
- CAS 418: Allocation of Direct and Indirect Cost



- Subpart 2.1: Definitions
- Part 31: Contract Cost
   Principles and Procedures
- Subpart 42.7: Indirect Cost Rates
- 52.216-7: Allowable Cost and Payment Clause
- 52.242-3: Penalties for Unallowable Costs



- OMB Circular A-87: Cost Principles for State, Local and Indian Tribal Governments
- OMB Circular A-122: Cost Principles for Non-Profit Organizations
- DCAA Cost Allowability Guidebook



# **Questions?**





# **Questions**?

TOM TAGLE	ANDY KANGELARIS	CLARKE BIRRELL		
Principal	Senior Manager	Senior Associate		
ttagle@bdo.com	akangelaris@bdo.com	cbirrell@bdo.com		

Our BDO Government Contracting consultants have 20+ years multi-industry experience that can be leveraged to share our knowledge with you through these events and as your engagement consultant under one of our many service offerings. For more information on how we can assist you, please contact <u>ttagle@bdo.com.</u>

We look forward to seeing you at our next Knowledge Share event and we encourage you to send us your questions.



# Appendix

Practice Overview: BDO Government Contracting Advisory





**39** UNRAVELING THE INCURRED COST PROPOSAL PROCESS

# BDO's 2024 Private Company Executive Compensation Survey

- BDO is conducting a survey of private company executive compensation levels.
- Participants will receive a complimentary results report.

Why This Survey is Important to Private Companies

- Reliable data is foundational for productive compensation discussions with the board or family members.
- Benchmarking data is critical to ensure pay levels are sufficient to attract and retain talent.
- Today's economy puts pressure on companies to make informed decisions, and Boards want data to substantiate decisions.
- There is very limited survey data focusing solely on private companies, this presents a unique opportunity to access data at no cost to you.



#### **KEY SURVEY CONTACTS**

Keolani Bradley, Senior Manager kbradley@bdo.com |203-905-6305

Judy Canavan, Managing Director jcanavan@bdo.com | 215-636-5637

# BDO's 2024 Private Company Executive Compensation Survey

OUR 2<sup>ND</sup> EDITION IS EVEN MORE ROBUST

#### COMPANIES INVITED TO PARTICIPATE

Privately Held Companies

- Family Owned
- Employee Owned (ESOP)
- Private Equity

APRIL 22

- Venture Capital
- Mutual
- Government Contractors

#### Company Size & Type

- Companies of various revenues and assets sizes
- Companies across all industries

#### **POSITIONS COVERED**

- CEO/President
- CFO
- NEW: COO/Top Operations
- NEW: Top Sales and/or Marketing

#### DATA COLLECTED

- Base salary and bonus/incentive
- Long-term incentives including cash plans, stock options, full value stock awards, and other LTIs
- Other compensation arrangements such as deferred compensation and capital accumulation plans

SEPT

- Board practices questions
- ESOP questions

#### QUESTIONNAIRE & RESULTS REPORT

- The questionnaire is accessed via a link to an online survey.
- Participants complete the online survey and submit to BDO.
- The comprehensive Excel results report is provided <u>only</u> to participants.
- The report contains tables with results that can be filtered by various scopes: revenue/assets, ownership structure or industry.

Survey Participation Opens MAY 30 Closes

Participant Report

Published

ост



# About BDO USA

Helping people thrive, every day, is our core purpose and foundation of our business. We believe there is no limit to what we can achieve — for our clients, professionals, and communities — when we do it together.

We are cultivating a conscious and caring corporate culture that puts people at the center of everything we do. We understand we have a role in contributing to a better future through:

- Sustainability and ESG
- Diversity, Equity, and Inclusion
- Community Engagement
- Innovation

Focusing on exceptional client outcomes, we are a true business advisor that delivers insight-driven perspectives and guidance through a comprehensive array of assurance, tax, and advisory services to help you navigate challenges, uncover opportunities, and adapt to the constantly changing business environment.



\* Statistics for the year ended April 30, 2023.

# **Global Reach**

Across the globe we work collectively toward a common goal — to help you navigate the constant evolution of today's marketplace and provide you with exceptional client service.

#### EXCEPTIONAL CLIENT SERVICE-EVERYWHERE AND ALWAYS

- Client needs: Invest in getting to know you so we can add value and anticipate your needs through our experience, knowledge, and technical skills
- Communication: Clear, open, and swift; you always know who to contact
- Commitment: High-quality service; efficient, and timely solutions, tailored to your needs
- People: Professionals experienced with global business operations, leveraging long-standing relationships and integrated technologies to deliver seamless service
- Value: New ideas, innovative thinking, and actionable advice an essential added value factor for your business

Everywhere you do business, now and in the future, we are here to provide seamless global service that focuses on quality and delivers long-term value.





Dark shading indicates BDO's locations \* Including exclusive alliance of BDO Member Firms. Statistics for the year ended September 30, 2023.

## **Industry Focused Leaders**



#### OUR STRATEGIC TECHNOLOGY AND BUSINESS ADVISORY SERVICES INCLUDE:



Government Contracting



Life Sciences Specialty Services



International Development

# **BDO's Government Contracting Practice**

#### BDO offers a breadth and depth of services to government contractors.

As one of the largest of its kind, our team brings the group's collective experience to bear in providing comprehensive and integrated services to help address practical business problems. Some of the many advisory services we provide to government contractors include: Cost Accounting Standards (CAS) and Federal Acquisition Regulations (FAR) consulting

Address government audits, compliance issues and contract disputes

Preparation and

negotiation of equitable

adjustment, delay,

disruption and

termination claims

CAS disclosure statement preparation

Cost rate structure design and analysis

Strategic pricing assistance, analysis of requests for proposal (RFPs) and preparation of cost proposals

> Incurred-cost submission reviews

Review of existing accounting systems for operational efficiency and compliance with the FAR and implementation of corrective measures Analysis of indirect rate calculations and cost allocations, and creation of forward-pricing models to facilitate favorable indirect rate absorption

45 UNRAVELING THE INCURRED COST PROPOSAL PROCESS

#### About BDO USA

Our purpose is helping people thrive, every day. Together, we are focused on delivering exceptional and sustainable outcomes and value for our people, our clients and our communities. BDO is proud to be an ESOP company, reflecting a culture that puts people first. BDO professionals provide assurance, tax and advisory services for a diverse range of clients across the U.S. and in over 160 countries through our global organization.

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#### www.bdo.com

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