



# ARE YOU READY TO BE A GOVERNMENT CONTRACTOR?

**The first step is to determine what your opportunity is and what the first steps are to position the company to compete.**

1. Identify the products or services that you wish to sell to the government or to government prime contractors and determine the correct NAICS code for the product or service (NAICS Codes are located at: <https://www.census.gov/eos/www/naics/>)
2. Obtain a Commercial and Government Entity Code (CAGE) code (CAGE codes is obtained at: <https://cage.dla.mil/Home/UsageAgree>)
3. Obtain a Data Universal Numbering System (DUNS) Number and Registration in the System for Award Management (SAM.gov).
4. Obtain a DUNS number through Dun and Bradstreet at <https://www.dnb.com/duns-number/get-a-duns.html>
5. Determine if your company qualifies for classification as a small and/or disadvantaged business, and if so, comply with SBA.gov requirements to utilize that certification. It will provide a big advantage as your pursue government contracting.
6. Identify current opportunities on Beta.SAM.gov.

IS THIS APPLICABLE TO YOUR ORGANIZATION?	Government Regulation Compliance Checklist	ANSWER: Yes/No/NA
<b>FAR Part 12 Commercial Pricing</b>	<ul style="list-style-type: none"> <li>• Do you have a product that you sell commercially that can be sold to the federal government?</li> <li>• Does this product meet the definition of a commercial item or commercial off the shelf items found in FAR 2.101?</li> </ul>	
<b>If the answer is YES to the above...</b>	<ul style="list-style-type: none"> <li>• Review FAR Part 12 and develop policies and procedures to comply with FAR Part 12 requirements.</li> <li>• Develop controls to provide current, accurate and complete data concerning sales history.</li> <li>• Understand that contracts are subject to termination for cause and convenience, that may necessitate compliant accounting practices.</li> <li>• Pursue Part 12 opportunities through Beta.SAM.gov.</li> </ul>	
<b>FAR Part 14 Sealed Bidding</b>	<ul style="list-style-type: none"> <li>• Do you have a product or service that can qualify for acquisition under sealed bid opportunities (FAR 6.401)?</li> </ul>	
<b>If the answer is YES to the above...</b>	<ul style="list-style-type: none"> <li>• Develop policies and procedures to comply with FAR Part 14 requirements.</li> <li>• Understand that you may be forced to perform at quoted prices even though those include bidding mistakes.</li> <li>• Understand that contracts are subject to termination for cause and convenience, that may necessitate compliant accounting practices.</li> <li>• Develop controls for estimating data that will allow your company to submit competitive sealed bids.</li> <li>• Pursue Part 14 opportunities through Beta.SAM.gov.</li> </ul>	

IS THIS APPLICABLE TO YOUR ORGANIZATION?	Government Regulation Compliance Checklist	ANSWER: Yes/No/NA
FAR Part 15 Contracting by Negotiation	<ul style="list-style-type: none"> <li>Do you have a product or service that can qualify for acquisition under contracting by negotiation requirements?</li> </ul>	
If the answer is YES to the above...	<ul style="list-style-type: none"> <li>Determine if current organization structure is suited to performing government work (best to centralize &amp; segregate government work).</li> <li>Determine if award is to be sole source or competitive (FAR 15.0). If sole source, may be subject to Truthful Cost or Pricing Data (TINA) requirements.</li> <li>Understand the request for proposals (FAR 15.2). Interact with government to understand their pain points.</li> <li>Understand source selection requirements (FAR 15.3). Do you have adequate qualifications and experience.</li> <li>Develop controls over certified cost or pricing data (FAR 15.4). Understand the risks associated with providing incorrect certified information, including the enforcement aspects of the Truthful Cost or Pricing Data Statute and the False Claims Act.</li> <li>Understand and follow proposal format requirements (FAR 15.408, Table 15-2).</li> <li>Understand prime contractor requirements relative to subcontractors and their certified cost or pricing data (FAR 15.4). Primes are responsible for their subs from start to finish.</li> <li>Develop an accounting system that complies with DFARS Accounting System criteria (even if non DoD*).</li> <li>Develop an estimating system that complies with DFARS Estimating System criteria (even if non DoD*).</li> <li>Develop a purchasing system that complies with DFARS Purchasing System criteria (even if non DoD*).</li> <li>Have policies and procedures to prepare compliant incurred cost submission in accordance with FAR 52.216-7. Incurred cost submissions are due six months after your fiscal year end.</li> <li>Develop controls to comply with FAR Part 31 (Contract Cost Principles), including related to allowability, allocability and reasonableness of costs if for profit or 2 CFR 200, Subpart E for non-profits. Claiming expressly unallowable costs in your indirect costs could result in penalties.</li> <li>Consider whether awards will result in modified or full Cost Accounting Standards (CAS) compliance requirements in accordance with 48 CFR 9903. If so, develop policies, procedures and controls to comply with CAS, including disclosure statement preparation. CAS applicability add additional oversight and potential for additional withholdings for noncompliant business system(s).</li> <li>Understand that even if awarded a fixed price contract, if change orders, delay claims, equitable adjustment claims occur, your system must be able to support these with FAR and CAS (if applicable) compliant accounting information. These estimates may be subject to audit.</li> <li>For those elements above that pertain to business systems, see our separate Business System Assessment Tool to understand readiness with regards to business systems</li> <li>Pursue Part 15 opportunities through Beta.SAM.gov.</li> <li>* Although the DFARS system rules at DFARS 252 only apply to DoD contracts, the criteria is widely use to evaluate these systems even if the systems are technically not subject to these requirement.</li> </ul>	

## About CohnReznick

As a leading advisory, assurance, and tax firm, CohnReznick helps forward-thinking organizations achieve their vision by optimizing performance, maximizing value, and managing risk. Clients benefit from the right team with the right capabilities; proven processes customized to their individual needs; and leaders with vital industry knowledge and relationships. Headquartered in New York, NY with offices nationwide, the firm serves organizations around the world through its global subsidiaries and membership in Nexia International. For more information, visit [www.cohnreznick.com](http://www.cohnreznick.com)



This has been prepared for information purposes and general guidance only and does not constitute legal or professional advice. You should not act upon the information contained in this publication without obtaining specific professional advice. No representation or warranty (express or implied) is made as to the accuracy or completeness of the information contained in this publication, and CohnReznick LLP, its members, employees and agents accept no liability, and disclaim all responsibility, for the consequences of you or anyone else acting, or refraining to act, in reliance on the information contained in this publication or for any decision based on it.



CohnReznick is an independent member of Nexia International



[cohnreznick.com](http://cohnreznick.com)