

# Demystifying DCAA Incurred Cost Submissions

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What does  
**FICS**  
stand for?

Final Incurred  
Cost Submission

# Agenda

- Filing Requirements for an Incurred Cost Submission
- Required Information needed to commence preparation
- Preparation of the Incurred Cost Submission
- Ramifications of Non-Compliance
- Statute of Limitations
- Incurred Cost Audit Tips

# Filing Requirements for an Incurred Cost Submission



# The Four W's for an ICS

## What

When a contract contains the following FAR Clause 52.216-7, Allowable Cost and Payment, normally found in solicitations/contracts that are cost-reimbursement (flexibly priced) or a time-and-materials contract (other than a contract for commercial items).

## When

Per FAR 52.216-7(d)(1)(2)(i) The Contractor shall 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.

- Reasonable extensions, for exceptional circumstances only, may be requested in writing by the Contractor and granted in writing by the Administrative Contracting Officer

# The Four W's for an ICS

## Where

To your cognizant DCMA and DCAA Representative

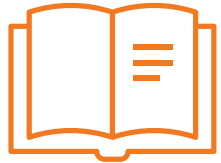


## Why

Balancing your Checkbook – To settle up on the amount the Government owes you or the amount you owe the Government

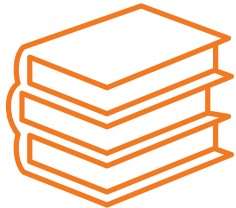


# Quick Summary Reference on Incurred Cost Submission

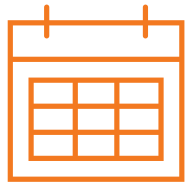


It begins with a contract FAR Clause 52.216-7, Allowable Cost & Payment

- Can be found in Prime and Subcontracts
- Applicable to Cost Type (flexibly priced) and T&Ms



A submission to “True-up” Provisional Rates to Actual Rates



Prepared Annually

- Due 6 months after company year-end

# Background on Incurred Cost Submission

## *Commonly asked questions*

- What if I have a T&M contract (prime or subcontract) with no “M”s?
- What if I have a T&M prime or subcontract and did not apply G&A on the pass-through?



*Skilled  
contract  
personnel  
are hard to  
find!*

# Who Does NOT Need to File an ICS

- Fixed Price Contracts
- Labor Hour Contracts
- Commercial Contracts
  - GSA Contract & Task Orders
- Contracts closed out under the quick close out procedure.

*When conditions under FAR 42.708(a) are satisfied Contracting Officer can settle indirect costs in advance of final indirect cost rate.*



# Required Information needed to commence preparation



# Where to Begin - Data Checklist

*Trial Balance  
(in excel format)*

## *Payroll Reconciliation*

- Year-end payroll summary report
- W-2 Summary
- 941 Quarterly Tax Returns

*Statement of Indirect Expenses OR Final FY Indirect Rate Calculation*

## *Job/Project Summary Reports (at billing level)*

- Flexibly priced government contracts
- Government T&M (normally GSA N/A)

*General Ledger Detail*

*A/R History*

# Where to Begin - Data Checklist

*Year-end or last invoices (if contract ended prior to fiscal year) with cumulative for all flexibly priced and T&M government contracts with the applicable FAR 52.216-7 clause.*

## *Contract Briefs or Contract Information*

- List of contract limitations for all contracts subject to ICS.
- Contract Briefs all for all contracts subject to ICS (Suppl O)

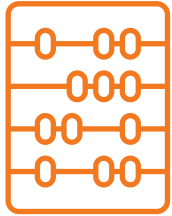
*List of total hours booked by labor category for each applicable Federal Government T&M contract (usually GSA task orders N/A).*

# Where to Begin - Data Checklist

- N** Note if each project listed on the ICS is DoD or Non-DoD and if Prime or Subcontract.
- N** Note if each project listed on the ICS has **physically ended** as of the year. (Yes/No)
- N** Note if subject to the penalty clause FAR 52.242-3.
- N** Subcontractor & Consultant information (for those that worked on any contracts subject to ICS)
- N** Review General Ledger to ensure all unallowable costs have not been claimed.



# Supplemental Information (only required at time of audit)



- Comparative analysis of indirect expense detailed by account (Supplemental As)



- General Organization and Executive Compensation information (Supplemental B)



- Identification of Prime contracts which Contractor perform as a Subcontractor (Supplemental C)

- Contract Briefs (Supplemental O)

# Supplemental Information (only required at time of audit)

## Certified Financial Statements

Management Letter from CPA concerning any internal control weaknesses

Actions that have been and/or will be implemented to correct the weakness described in management letter

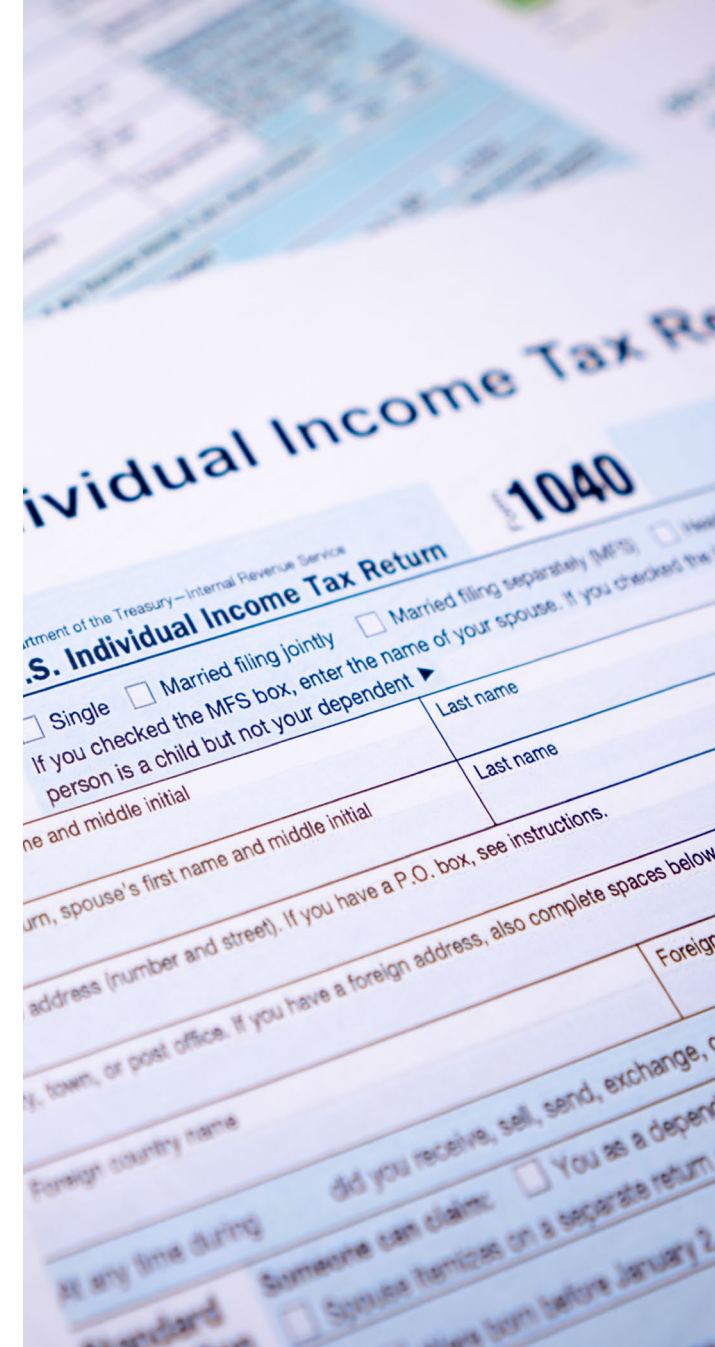
List of all Internal Audit Reports Issues since the last disclosure of the Internal Audit Reports

Annual Internal Audit plan of scheduled audit to be performed in the fiscal year when final indirect cost rate submission is made

# Supplemental Information

(only required at time of audit)

- Federal and State Tax Returns
- Securities & Exchange Commission 10K report
- Minutes from Board of Directors meetings
- Listing of delay claims and termination claims
- Description of accounting system
- Procedures for identifying and handling unallowable costs
- List of work sites and the number of employees assigned to each site



# Supplemental Information (only required at time of audit)

## Written Policies



- Segregation of Unallowables

- Bonus Policy

- Labor & Timekeeping



- Subcontractor/Vendor procurement and payments

- Travel Policy



- Billing Policy

- Handling of withholds
- Contract Limitations
- Labor Category & Qualifications



# Preparation of the ICS

# Supplemental Develop Custom ICS Model

Recommend developing your own model & customize to your company's indirect rate structure

Can use DCAA's ICE model under checklist & tools  
(<https://www.dcaa.mil/Checklists-Tools/ICE-Model/>)

Drop in Trial Balance and link to Schedules A-E to calculate the actual rates

# Sort The Trial Balance

GL ACCOUNT	ACCOUNT NAME	EB @ 12/31/2023	
50.11.05	Direct Labor	-	
50.21.05	Direct Travel	-	
50.31.11	Subk/Consultants	-	
50.51.05	Direct ODCs	-	
50.51.99	Non-Billable ODCs	-	
50.61.05	Direct Materials	-	
		-	Direct
60.11.05	Paid Time Off	-	
60.11.11	Holiday Expense	-	
60.11.15	Paid Sick Leave	-	
60.11.21	Bereavement	-	
60.11.25	Jury Duty	-	
60.11.31	Military Duty	-	
60.11.35	LWOP	-	
60.11.41	Other Leave	-	
60.11.45	Severance Pay	-	
60.21.05	Employer FICA	-	
60.21.11	Employer FUTA	-	
60.21.15	Employer SUTA	-	
60.21.21	Employer Other Tax Expense	-	
60.31.05	Workers Comp Expense	-	
60.31.11	LTD/STD/SDI	-	
60.31.15	Employer Insurance Expense (Medi	-	
60.31.21	Employer 401K Contribution	-	
60.31.25	Benefits Administration	-	
60.31.31	Tuition Reimbursement	-	
		-	Fringe
62.01.01	SVC Labor	-	
83.21.05	Facility Rent Expense	-	
83.21.11	Facility Repairs and Maint	-	
83.21.15	Facility Office Cleaning/Supplies	-	
83.21.21	Facility Communications	-	
83.21.25	Facility Utilities	-	
83.21.31	Facility Office Furnishings	-	
83.21.35	Facility Office Equipment	-	
83.21.41	Facility Office Supplies	-	
83.21.45	Facility Property Taxes	-	
		-	Facility
70.01.01	OH Labor - Home	-	
70.01.02	OH Performance Bonus	-	
70.02.01	Business Travel - OH	-	
70.02.02	Business Meals - OH	-	
70.02.05	Confereces/Training Exp.	-	
70.02.06	Recruiting Exp.	-	
70.02.07	Dues & Subscriptions	-	
		-	
		-	Overhead

# Sort The Trial Balance

GL ACCOUNT	ACCOUNT NAME	EB @ 12/31/2023	
80.01.01	G&A Labor	-	
80.21.05	G&A Travel	-	
80.21.15	G&A Accounting Fees	-	
80.21.21	G&A Legal Expense	-	
80.21.25	G&A Professional Fees	-	
80.21.31	G&A Temporary Help	-	
80.21.35	G&A Training and Education	-	
80.21.41	G&A Meeting & Conferences	-	
80.21.45	G&A Business Insurance Expense	-	
80.21.51	G&A Hardware Expense	-	
80.21.55	G&A Software Expense	-	
80.21.61	G&A Dues & Subscriptions	-	
80.21.65	G&A Licenses & Permits	-	
80.21.71	G&A Bank Service Charge	-	
80.21.85	G&A Mobile Phones	-	
80.21.95	G&A Auto Expense	-	
80.31.11	G&A State Income Tax	-	
80.31.15	G&A Local Income Tax	-	
80.31.21	G&A Other Expense	-	
80.31.31	G&A Recruiting	-	
		-	G&A
88.11.05	B&P Labor	-	
88.21.21	B&P ODCs	-	
		-	B&P
89.11.05	IR&D Labor	-	
89.21.21	IR&D ODCs	-	
		-	IR&D
92.11.71	U/A Labor - OH	-	
92.11.81	U/A Labor - G&A	-	
90.11.05	U/A Contributions	-	
90.11.11	U/A Bad Debt Expense	-	
90.11.15	U/A Penalties	-	
90.11.21	U/A Safe Harbor Exp	-	
90.11.25	U/A Legal Fees	-	
90.11.31	U/A Advertising	-	
90.11.35	U/A Dues & Membership	-	
90.11.41	U/A Entertainment	-	
90.11.45	U/A Bonus Exp	-	
90.11.51	U/A Miscellaneous	-	
90.11.55	U/A Employee Morale	-	
90.11.61	U/A AR Discounts	-	
92.11.70	U/A OH Costs for G&A Base	-	
		-	Unallowable

**APRIO LLC - EXAMPLE**  
**Schedule A - Summary of Claimed Indirect Rates**  
**For The Year Ended 12/31/2023**

# Schedule A – Summary of Claimed Indirect Rates

COST ELEMENT	CLAIMED	REFERENCE
<b><u>FRINGE</u></b>		
Pool	\$ 29,568,034	<a href="#">SCHED C-2</a>
Base	86,007,500	<a href="#">SCHED E</a>
Claimed Fringe Rate:	<b><u>34.38%</u></b>	
<b><u>OVERHEAD</u></b>		
Pool	\$ 414,562	<a href="#">SCHED C</a>
Base	114,325,890	<a href="#">SCHED E</a>
Claimed OH Rate:	<b><u>0.36%</u></b>	
<b><u>SUBK &amp; MATERIAL HANDLING</u></b>		
Pool	\$ 125,953	<a href="#">SCHED B-1</a>
Base	15,080,000	<a href="#">SCHED E</a>
Claimed SMH Rate:	<b><u>0.84%</u></b>	
<b><u>GENERAL &amp; ADMIN.</u></b>		
Pool	\$ 1,231,336	<a href="#">SCHED B</a>
Base	115,026,838	<a href="#">SCHED E</a>
Claimed G&A Rate:	<b><u>1.07%</u></b>	
<b>INTERMEDIATE RATES</b>		
<b><u>SVC 1 - Facility/IT</u></b>		
Pool	\$ 147,979	<a href="#">SCHED D</a>
Base	138	<a href="#">SCHED D</a>
Facility Service Center	<b><u>\$ 1,072.31</u></b>	\$ Per Labor Hour

## APRIO LLC - EXAMPLE

Schedule B - General and Administrative (G&A) Expenses (Final Indirect Cost Pool)  
For The Year Ended 12/31/2023Schedule B –  
G&A Pool  
(Final Claimed  
Rate)

Account	Description	Expenses per G/L	Adjustments	Expenses Claimed	Notes	Reference
80.01.01	G&A Labor	\$ 500,000		\$ 500,000		
80.01.03	G&A B&P Labor	45,000		45,000		
	<b>TOTAL G&amp;A LABOR</b>	<b>\$ 545,000</b>	<b>\$ -</b>	<b>\$ 545,000</b>		
80.21.05	G&A Performance Bonus	109,000		109,000		
80.21.15	Business Travel - G&A	15,000		15,000		
80.21.21	Business Meals - G&A	6,000		6,000		
80.21.25	Accounting Fees	85,000		85,000		
80.21.31	Legal Expense	65,000		65,000		
80.21.35	Other Professional Fees	2,500		2,500		
80.21.41	Training & Conferences Exp.	15,000		15,000		
80.21.45	Business Insurance Expense	3,500		3,500		
80.21.51	Dues & Subscriptions	1,650		1,650		
80.21.55	Licenses & Permits	2,400		2,400		
80.21.61	Bank Service Charge	5,500		5,500		
80.21.65	G&A Auto Expense	4,500		4,500		
80.21.71	Recruiting Exp.	7,500		7,500		
80.31.11	State Income Tax	2,000		2,000		
80.31.15	Local Income Tax	1,000		1,000		
		-		-		
	<b>TOTAL BEFORE ALLOCATIONS &amp; B&amp;P</b>	<b>\$ 870,550</b>	<b>\$ -</b>	<b>\$ 870,550</b>		
	Fringe Allocation		187,141	187,141		<a href="#">SCHED C-2</a>
	Facility SVC		52,318	52,318		<a href="#">SCHED D</a>
	<b>TOTAL BEFORE B&amp;P</b>	<b>\$ 870,550</b>	<b>\$ 239,459</b>	<b>\$ 1,110,009</b>		

# Schedule B – G&A Pool (Final Claimed Rate)

	Fringe Allocation		187,141	187,141	
	Facility SVC		52,318	52,318	
	<b>TOTAL BEFORE B&amp;P</b>	<b>\$ 870,550</b>	<b>\$ 239,459</b>	<b>\$ 1,110,009</b>	
88.11.05	B&P Labor	100,000		100,000	
88.21.21	B&P ODCs	7,500		7,500	
	Fringe Allocation		34,338	34,338	
	Overhead Allocation		341	341	
	<b>TOTAL B&amp;P</b>	<b>\$ 107,500</b>	<b>\$ 34,679</b>	<b>\$ 142,179</b>	
89.11.05	IR&D Labor	2,500		2,500	
89.21.21	IR&D ODCs	1,000		1,000	
	Fringe Allocation		858	858	
	Overhead Allocation		11	11	
	<b>TOTAL IR&amp;D</b>	<b>\$ 3,500</b>	<b>\$ 870</b>	<b>\$ 4,370</b>	
	<b>TOTAL G&amp;A POOL</b>	<b>\$ 981,550</b>	<b>\$ 275,008</b>	<b>\$ 1,256,558</b>	

[SCHED C-2](#)  
[SCHED D](#)

[SCHED C-2](#)  
[SCHED E](#)

[SCHED C-2](#)  
[SCHED E](#)

# Schedule B – G&A Pool (Final Claimed Rate)

## Unallowable Costs per FAR 31.205:

92.01.02	U/A Labor - G&A	15,000	(15,000)	-	(1)
	Fringe Allocation	5,151	(5,151)	-	(1)
90.11.05	U/A Contributions	10	(10)	-	(1)
90.11.11	U/A Bad Debt Expense	10	(10)	-	(1)
90.11.15	U/A Penalties	10	(10)	-	(1)
90.11.25	U/A Legal Fees	10	(10)	-	(1)
90.11.31	U/A Advertising	10	(10)	-	(1)
90.11.45	U/A Bonus Exp - G&A	10	(10)	-	(1)
		-	-	-	(1)
<b>TOTAL UNALLOWABLE</b>		<b>\$ 20,211</b>	<b>\$ (20,211)</b>	<b>\$ -</b>	

[SCHED C-2](#)

## Unallowable Costs subject to G&A - FAR 31.203(d):

90.11.41	U/A Entertainment	10	(10)	-	(2)
90.11.55	U/A Employee Morale	10	(10)	-	(2)
		-	-	-	(2)
<b>TOTAL UNALLOWABLE</b>		<b>\$ 20</b>	<b>\$ (20)</b>	<b>\$ -</b>	

[SCHED E](#)

[SCHED E](#)

[SCHED E](#)

## Explanatory Notes:

- (1) Unallowable (U/A) per FAR 31.205  
 (2) U/A per FAR 31.205 and Included in the base of G&A on Schedule E

-	-
TB	SCHED H
-	
TB	
-	
TB	

**APRIO LLC - EXAMPLE**  
**Schedule B-1 - Subcontract and Material Handling Costs (Final Indirect Cost Pool)**  
**For The Year Ended 12/31/2023**

Schedule B-1  
 – SM&H Pool  
 (Final  
 Claimed  
 Rate)

*If Applicable*

Account	Description	Expenses per G/L	Adjustments	Expenses Claimed	Notes Reference
85.01.01	SM&H Labor	\$ 85,000		\$ 85,000	
	–	-		-	
	<b>TOTAL SMH LABOR</b>	<b>\$ 85,000</b>	<b>\$ -</b>	<b>\$ 85,000</b>	
85.01.05	SM&H Performance Bonus	8,500		8,500	
85.01.06	Business Travel Exp.	5		5	
85.01.07	Business Travel - OH	4		4	
85.01.08	Business Meals - OH	3		3	
85.01.09	Confernces/Training Exp.	2		2	
	–	-		-	
	<b>TOTAL BEFORE ALLOCATIONS</b>	<b>\$ 93,514</b>	<b>\$ -</b>	<b>\$ 93,514</b>	
	Fringe Allocation		29,187	\$ 29,187	<a href="#">SCHED C-2</a>
	Facility SVC		5,412	5,412	<a href="#">SCHED D</a>
	<b>TOTAL SMH POOL</b>	<b>\$ 93,514</b>	<b>\$ 34,599</b>	<b>\$ 128,113</b>	
		-		-	
		TB		SCHED H	

# Schedule C – Overhead(s) Pool (Final Claimed Rate)

*May have multiple  
Schedules*

**APRIO LLC - EXAMPLE**  
Schedule C - Home Site Overhead Expenses (Final Indirect Cost Pool)  
For The Year Ended 12/31/2023

Account	Description	Expenses per G/L	Adjustments	Expenses Claimed	Notes Reference
70.01.01	OH Labor	\$ 150,000		\$ 150,000	
	<b>TOTAL OH LABOR</b>	<b>\$ 150,000</b>	<b>\$ -</b>	<b>\$ 150,000</b>	
70.01.02	OH Performance Bonus	95,000		95,000	
70.02.01	Business Travel - OH	10		10	
70.02.02	Business Meals - OH	9		9	
70.02.05	Confernces/Training Exp.	8		8	
70.02.06	Recruiting Exp.	7		7	
70.02.07	Dues & Subscriptions	6		6	
	<b>TOTAL BEFORE ALLOCATIONS</b>	<b>\$ 245,040</b>	<b>\$ -</b>	<b>\$ 245,040</b>	
	Fringe Allocation		51,507	51,507	<a href="#">SCHED C-2</a>
	Facility SVC		90,204	90,204	<a href="#">SCHED D</a>
	<b>TOTAL OVERHEAD POOL</b>	<b>\$ 245,040</b>	<b>\$ 141,711</b>	<b>\$ 386,751</b>	
		-		-	
		TB		SCHED H	

## APRIO LLC - EXAMPLE

Schedule C-2 - Fringe Benefits Expenses (Final Indirect Cost Pool)  
For The Year Ended 12/31/2023

# Schedule C-2 – Fringe Pool (Final Claimed Rate)

Account	Description	Expenses per G/L	Adjustments	Expenses Claimed	Notes	Reference
60.11.05	Paid Time Off	\$ 10,320,900		\$10,320,900		
60.11.21	Bereavement	50.00		50		
60.11.25	Jury Duty	50.00		50		
60.11.31	Military Duty	50.00		50		
60.11.41	Other Leave	5.00		5		
		-		-		
	<b>TOTAL FRINGE LABOR</b>	<b>\$ 10,321,055</b>	<b>\$ -</b>	<b>\$10,321,055</b>		
60.11.40	Spot Bonus	35,000		35,000		
60.21.05	Employer FICA	7,144,040		7,144,040		
60.21.11	Employer FUTA	50		50		
60.21.15	Employer SUTA	50		50		
60.21.21	Employer Other Tax Expense	50		50		
60.31.05	Workers Comp Expense	50		50		
60.31.11	LTD/STD/SDI	50		50		
60.31.15	Employer Medical/Dental/AD&D Exp.	9,654,108		9,654,108		
60.31.21	Employer 401K Contribution	2,413,527		2,413,527		
60.31.25	Benefits Administration	50		50		
60.31.31	Tuition Reimbursement	5		5		
		-		-		
	<b>TOTAL FRINGE POOL</b>	<b>\$ 29,568,034</b>	<b>\$ -</b>	<b>\$29,568,034</b>		

**Explanatory Notes:**

(3) Put Explanation Here Why and Where Cost is being Reallocated or Adjusted.

# Schedule C-2

## – Fringe Pool (Final Claimed Rate)

Allocation based is over Total Cumulative Labor Dollars

Description	Labor Dollars	% of Total	Allocation	Notes	Reference
G&A Labor	545,000	0.63%	187,141		<a href="#">SCHED B (G&amp;A)</a>
B&P Labor	100,000	0.12%	34,338		<a href="#">SCHED B (B&amp;P)</a>
IR&D Labor	2,500	0.00%	858		<a href="#">SCHED B (IR&amp;D)</a>
Unallowable Labor	15,000	0.02%	5,151		<a href="#">SCHED B (Unal)</a>
SM&H Labor	85,000	0.10%	29,187		<a href="#">SCHED B-1</a>
Overhead Labor	150,000	0.17%	51,507		<a href="#">SCHED C</a>
Service Center Labor	110,000	0.13%	37,772		<a href="#">SCHED D</a>
Direct Labor	85,000,000	98.83%	29,187,081		<a href="#">TB</a>
<b>TOTALS</b>	<b>\$ 86,007,500</b>	<b>100.00%</b>	<b>\$29,533,034</b>		

-	-	-
TB	ICS	SCHED C-2

# Schedule D – Facility/IT Service Center (Intermediate Pool)

**APRIO LLC - EXAMPLE**  
Schedule D - Service Center for Facility Costs (Intermediate Indirect Cost Pool)  
For The Year Ended 12/31/2023

Account	Description	Expenses per G/L	Adjustments	Expenses Claimed	Notes	Reference
62.01.01	SVC Labor	\$ 110,000		\$ 110,000		
		-		-		
	<b>TOTAL FAC LABOR</b>	<b>\$ 110,000</b>	<b>\$ -</b>	<b>\$ 110,000</b>		
62.01.05	Performance Bonus	20		20		
62.01.06	Rent Expense	19		19		
62.01.07	Repairs and Maint	18		18		
62.01.08	Office Supplies/Expense	17		17		
62.01.09	IT/Communications	16		16		
62.01.10	Hardware Exp.	15		15		
62.01.11	Software Exp.	14		14		
62.01.12	Utilities	13		13		
62.01.13	Office Furnishings	12		12		
62.01.14	Office Equipment	10		10		
62.01.15	Property Taxes	9		9		
	Fringe Allocation		37,772	37,772		<a href="#">SCHED C-2</a>
	<b>TOTAL SERVICE CENTER</b>	<b>\$ 110,163</b>	<b>\$ 37,772</b>	<b>\$ 147,935</b>		

**Allocated based over Labor Hours for all applicable labor**

Description	Labor Hours	% of Total	Allocation	Notes	Reference
G&A Labor	20	14.49%	21,440		<a href="#">SCHED B</a>
B&P Labor	4	2.90%	4,288		<a href="#">SCHED B</a>
IR&D Labor	1	0.72%	1,072		<a href="#">SCHED B</a>
SM&H Labor	3	2.17%	3,216		<a href="#">SCHED B-1</a>
Overhead Labor	10	7.25%	10,720		<a href="#">SCHED C</a>
Direct Labor	100	72.46%	107,199		<a href="#">SCHED C</a>
<b>TOTALS</b>	<b>\$ 138</b>	<b>100.00%</b>	<b>\$ 147,935</b>		

- - -  
TB ICS Schedule D

## APRIO LLC - EXAMPLE

Schedule E - Reconciliation of Claimed Allocation Bases  
For The Year Ended 12/31/2023

Description	Expenses per G/L	Adjustments	Expenses Claimed	Ref	
<b>Fringe Benefits</b>	<b>\$ 29,533,034</b>	<b>\$ -</b>	<b>\$ 29,533,034</b>	<a href="#">SCHED C-2</a>	-
<b>Fringe Benefits Base:</b>					<b>Allocation</b>
G&A Labor	545,000		545,000	<a href="#">SCHED B</a>	187,141
B&P Labor	100,000		100,000	<a href="#">SCHED B</a>	34,338
IR&D Labor	2,500		2,500	<a href="#">SCHED B</a>	858
Unallowable Labor	15,000		15,000	<a href="#">SCHED B</a>	5,151
SM&H Labor	85,000		85,000	<a href="#">SCHED B-1</a>	29,187
Overhead Labor	150,000		150,000	<a href="#">SCHED C</a>	51,507
Service Center Labor	110,000		110,000	<a href="#">SCHED D</a>	37,772
Direct Labor	85,000,000		85,000,000	<a href="#">TB</a>	29,187,081
<b>Total Fringe Base</b>	<b>\$ 86,007,500</b>	<b>\$ -</b>	<b>\$ 86,007,500</b>		<b>\$ 29,533,034</b>

Fringe Rate **34.34%**

Description	Expenses per G/L	Adjustments	Expenses Claimed	Ref	
<b>Overhead Pool</b>	<b>\$ 245,040</b>	<b>\$ 169,425</b>	<b>\$ 414,465</b>	<a href="#">SCHED C</a>	-
<b>Overhead Base:</b>					<b>Allocation</b>
Direct Labor	85,000,000		85,000,000	<a href="#">SCHED E</a>	308,244
Fringe on DL	29,187,081		29,187,081	<a href="#">SCHED E</a>	105,844
B&P Labor	100,000		100,000	<a href="#">SCHED B</a>	363
Fringe on B&P	858		858	<a href="#">SCHED E</a>	3
IR&D Labor	2,500		2,500	<a href="#">SCHED B</a>	9
Fringe on IR&D	858		858	<a href="#">SCHED E</a>	3
<b>Total Overhead Base</b>	<b>\$ 114,291,298</b>	<b>\$ -</b>	<b>\$ 114,291,298</b>		<b>\$ 414,465</b>

OH Rate **0.36%**

Description	Expenses per G/L	Adjustments	Expenses Claimed	Ref	
<b>SMH Pool</b>	<b>\$ 93,514</b>	<b>\$ 32,403</b>	<b>\$ 125,917</b>	<a href="#">SCHED B-1</a>	-
<b>SMH Base:</b>					<b>Allocation</b>
Subk/Consultants	15,000,000		15,000,000	<a href="#">TB</a>	125,249
Direct Materials	80,000		80,000	<a href="#">TB</a>	668
<b>Total Subk/Handling Base</b>	<b>\$ 15,080,000</b>	<b>\$ -</b>	<b>\$ 15,080,000</b>		<b>\$ 125,917</b>

SMH Rate **0.83%**

# Schedule E – Basis of Allocation

# Schedule E – Basis of Allocation

Pool & Description	Expenses per G/L	Adjustments	Expenses Claimed	Ref	
G&A Pool	\$ 981,550	\$ 249,515	\$ 1,231,065	<a href="#">SCHED B</a>	-
<b>G&amp;A Base:</b>					<b><u>Allocation</u></b>
Direct Labor	85,000,000		85,000,000	<a href="#">TB</a>	909,980
Fringe on DL	29,187,081		29,187,081	<a href="#">SCHED E</a>	312,466
OH on Direct Labor	414,087		414,087	<a href="#">SCHED E</a>	4,433
Direct Travel	250,000		250,000	<a href="#">TB</a>	2,676
Direct ODCs	15,000		15,000	<a href="#">TB</a>	161
Non-Billable ODCs	10		10	<a href="#">TB</a>	0
SMH Expenses	125,917		125,917	<a href="#">SCHED E</a>	1,348
U/A subject to G&A	20		20	<a href="#">SCHED B</a>	0
<b>Total Value-Added G&amp;A Base</b>	<b>\$114,992,116</b>	<b>\$ -</b>	<b>\$ 114,992,116</b>		<b>\$ 1,231,065</b>
			<b>G&amp;A Rate</b>	<b>1.07%</b>	-

**EXPLANATORY NOTES:**

- Pool** Fringe Benefit Expenses - Schedule C-2
- Base** Total labor dollars excluding fringe labor dollars
  
- Pool** Overhead Expenses - Schedule C
- Base** Direct labor & B&P/IR&D dollars and applicable fringes
  
- Pool** Subcontract, Material & Handling Expenses - Schedule B-1
- Base** Subcontract and Direct Material costs
  
- Pool** General and Administrative Expenses - Schedule B
- Base** Value added G&A (total direct costs other than subcontractors and materials and before B&P/IR&D cos
  
- Pool** Facility Expenses (intermediate) - Schedule D
- Base** Allocated based over Labor Hours for all applicable labor

	131,323,391
	(131,323,391)
Check Sum	-

**APRIO LLC - EXAMPLE**  
**Proof ICS to Trial Balance**  
**For The Year Ended 12/31/2023**

	ICS RATE	PER ICS	PER TB
Direct Labor		\$ 85,000,000	\$ 85,000,000
Fringe Costs	34.34%	29,187,081	29,533,034
Overhead Rate	0.36%	414,087	245,040
B&P/IR&D Costs			111,000
Facility/IT Costs			110,163
Direct Travel		250,000	250,000
Direct ODCs		15,000	15,000
Non-Billable ODCs		10	10
U/A subject to G&A		20	
Subtotal		114,866,199	115,264,247
Subcontractor		15,000,000	15,000,000
Materials		80,000	80,000
SM&H Rate	0.83%	125,917	93,514
Subtotal		130,072,116	130,437,761
G&A Rate	1.07%	1,231,065	870,550
<b>TOTAL CLAIMED COSTS</b>		<b>\$ 131,303,180</b>	<b>\$ 131,308,311</b>
Unallowable Costs	Sch B	20,211	15,080
<b>TOTAL COSTS PER ICS</b>		<b>\$ 131,323,391</b>	<b>\$ 131,323,391</b>
Out of Balance	0.00%	-	-
<b>TOTAL COSTS PER TB</b>		<b>\$ 131,323,391</b>	<b>\$ 131,323,391</b>

Proof of Rates –  
*Not Required but  
Recommended*

# Schedule H

APRIO LLC - EXAMPLE									
Schedule H - Direct Cost by Contract/Subcontract, IR&D/B&P. Direct Incurred, For The Year Ended 12/31/2023									
Internal No.	Contract No.	Order No.	GL# Direct Labor	GL# Travel	GL# Other Direct Costs	GL# Non-Billable	GL# Subk & Consultants	GL# Materials	Total Direct Costs
<b>US Gov't CPFF Contracts</b>									
<i>Flexibly Priced - DoD (Prime)</i>									
<i>Flexibly Priced - DoD (Subcontractor)</i>									
<i>Flexibly Priced - Non-DoD (Prime)</i>									
<i>Flexibly Priced - Non-DoD (Subcontractor)</i>									
1000-10-000	Aprio Example	N/A	85,000,000	250,000	15,000	10	15,000,000	80,000	100,345,010
<b>Subtotal US Gov't CPFF</b>			<b>\$ 85,000,000</b>	<b>\$ 250,000</b>	<b>\$ 15,000</b>	<b>\$ 10</b>	<b>\$ 15,000,000</b>	<b>\$ 80,000</b>	<b>\$ 100,345,010</b>
<b>US Gov't T&amp;M Contracts</b>									
<i>Time &amp; Materials - DoD (Prime)</i>									
<i>Time &amp; Materials - DoD (Subcontractor)</i>									
<i>Time &amp; Materials - Non-DoD (Prime)</i>									
<i>Time &amp; Materials - Non-DoD (Subcontractor)</i>									
<b>Subtotal US Gov't T&amp;M</b>			<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<i>All Commercial, FFP, GSA, Does not contain</i>			<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>TOTAL CONTRACT COSTS</b>			<b>\$ 85,000,000</b>	<b>\$ 250,000</b>	<b>\$ 15,000</b>	<b>\$ 10</b>	<b>\$ 15,000,000</b>	<b>\$ 80,000</b>	<b>\$ 100,345,010</b>
B&P			100,000		7,500				107,500
IR&D			2,500		1,000				3,500
<b>Total B&amp;P/IR&amp;D</b>			<b>\$ 102,500</b>	<b>\$ -</b>	<b>\$ 8,500</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 111,000</b>
<b>TOTAL ALL COSTS</b>			<b>\$ 85,102,500</b>	<b>\$ 250,000</b>	<b>\$ 23,500</b>	<b>\$ 10</b>	<b>\$ 15,000,000</b>	<b>\$ 80,000</b>	<b>\$ 100,456,010</b>
CHECK SUM			-	-	-	-	-	-	-

# Schedule H (Continued)

34.34%	0.36%		0.83%	1.07%	
Fringe	Overhead	Direct Costs & Overhead	SMH	G&A	Total Costs
29,187,081	414,087	129,946,179	125,917	1,231,064	131,303,160
-	-	-	-	-	-
-	-	-	-	-	-
<b>\$ 29,187,081</b>	<b>\$ 414,087</b>	<b>\$ 129,946,179</b>	<b>\$ 125,917</b>	<b>\$ 1,231,064</b>	<b>\$ 131,303,160</b>
-	-	-	-	-	-
-	-	-	-	-	-
<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
-	-	-	-	-	-
<b>\$ 29,187,081</b>	<b>\$ 414,087</b>	<b>\$ 129,946,179</b>	<b>\$ 125,917</b>	<b>\$ 1,231,064</b>	<b>\$ 131,303,160</b>
34,338	-	141,838			
858	-	4,358			
<b>\$ 35,196</b>	<b>\$ -</b>	<b>\$ 146,196</b>			
<b>\$ 29,222,277</b>	<b>\$ 414,087</b>	<b>\$ 130,092,375</b>	<b>\$ 125,917</b>	<b>\$ 1,231,064</b>	<b>\$ 131,303,160</b>
<a href="#">SCHED C-2</a>	<a href="#">SCHED C</a>		<a href="#">SCHED B-1</a>	<a href="#">SCHED B</a>	

# Schedule H – With Indirect Rate Ceilings

NOTE: If there are ceilings on contracts - please add in columns to account for ceiling

34.34%	0.36%		0.83%	1.07%						
Fringe	Overhead	Direct Costs & Overhead	SMH	G&A	Fringe In Excess of Ceiling	OH In Excess of Ceiling	G&A In Excess of Ceiling	PPP Direct Credit	Total Costs	
29,187,081	414,087	129,946,179	125,917	1,231,064						131,303,160
-	-	-	-	-						-
-	-	-	-	-						-
<b>\$ 29,187,081</b>	<b>\$ 414,087</b>	<b>\$ 129,946,179</b>	<b>\$ 125,917</b>	<b>\$ 1,231,064</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 131,303,160</b>
-	-	-	-	-						-
-	-	-	-	-						-
<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
-	-	-	-	-						-
<b>\$ 29,187,081</b>	<b>\$ 414,087</b>	<b>\$ 129,946,179</b>	<b>\$ 125,917</b>	<b>\$ 1,231,064</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 131,303,160</b>
34,338	-	141,838								
858	-	4,358								
<b>\$ 35,196</b>	<b>\$ -</b>	<b>\$ 146,196</b>								
<b>\$ 29,222,277</b>	<b>\$ 414,087</b>	<b>\$ 130,092,375</b>	<b>\$ 125,917</b>	<b>\$ 1,231,064</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 131,303,160</b>
<a href="#">SCHED C-2</a>	<a href="#">SCHED C</a>		<a href="#">SCHED B-1</a>	<a href="#">SCHED B</a>						





**APRIO LLC - EXAMPLE**

**Schedule K- Summary of Hours and Amounts on T&M/Labor Hour Contracts  
For The Year Ended 12/31/2023**

INTERNAL NUMBER <input type="text" value="0"/>					
PRIME CONTRACT NO.: <input type="text" value="0"/>					
LABOR	RATE	HRS	AMOUNT	OTHER COSTS	AMOUNT
WH Specialist II	\$ 35	1,139	\$ 40,070	Travel	\$ -
WH Specialist II (NB)			-	Other Direct Costs	-
			-	Non-Billable	-
			-	Subk & Consultants	-
			-	Materials	-
			-	Sub-Total	-
			-	G&A @: 1.07%	-
			-	Subtotal	-
			-	<b>TOTAL</b>	<b>\$ 40,070</b>
Subtotal - Labor		1,139	40,070	Task Ceiling	

**\*\* Subcontractor Billed in Labor Category**

Schedule K



# Ramifications of Non-Compliance

# Ramifications of Non-Compliance

Associated Risk for non-compliance:

- Administrative Contracting Officer (ACO) can unilaterally decrement your rates up to **16.2%** if submissions are not on time! (FAR 42.703-2(c)(2))
- Rates established unilaterally will be:
  - Based on audited historical data or other available data as long as unallowable costs are excluded; and
  - Set low enough to ensure that unallowable costs will not be reimbursed.



*Be timely  
with your  
submissions!*

# Ramifications of Non-Compliance



Failure to provide an Incurred Cost Submission can also compromise the status of your accounting system.

**Failed accounting system affects your ability to win new/follow-on work**

# Unallowables and Penalties

## Unallowable Cost

- DCAA's guidance on Identifying Expressly Unallowable Costs!!

## Penalties

- Penalties for claiming unallowable costs FAR 42.709-1.
- If the indirect cost is expressly unallowable under a cost principle in the FAR, the penalty is equal to
  - Deemed Unallowable during Audit
    - The amount of the disallowed costs allocated to contracts that are subject to this section; plus
    - Interest on the paid portion, if any.
  - Deemed Unallowable prior to ICS
    - The amount of the disallowed costs allocated to contracts that are subject to this section; plus
    - Interest on the paid portion, if any.
    - Rest on the paid portion, if any.



*These penalties are in addition to other administrative, civil, and criminal penalties provided by law.*

The background features a blurred image of an open book with its pages fanned out. The lighting is warm, suggesting a sunset or sunrise, with a bright orange and yellow glow in the upper right quadrant. A white, jagged, torn-paper-like border separates the book image from a solid orange area on the right.

# Statute of Limitations

# Statute of Limitations



- In October, 1994, the Federal Acquisition Streamlining Act (FASA) established a six (6) year Statute of Limitations for claims under the Contract Disputes Act (CDA).



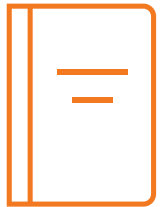
- FAR Clause 33.206 Initiation of a claim
- (b) The contracting officer shall issue a written decision on any Government claim initiated against a contractor within 6 years after accrual of the claim, unless the contracting parties agreed to a shorter time period. The 6-year period shall not apply to contracts awarded prior to October 1, 1995, or to a Government claim based on a contractor claim involving fraud.



# Statute of Limitations



- “**Accrual of a claim**” means the date when all events, that fix the alleged liability of either the Government or the contractor and permit assertion of the claim, **were known or should have been known**. For liability to be fixed, some injury must have occurred. However, monetary damages need not have been incurred.



- Historically this was thought by the Government to start tolling on the date the audit was complete. However, based on 2 court decisions (Boeing and Raytheon) it is in fact per the date of submission (**were known or should have been known**).



## APRIO LLC - EXAMPLE

Schedule N- Certificate of Final Indirect Costs  
For The Year Ended 12/31/2023

## Certificate of Final Indirect Costs

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 this proposal to establish final indirect cost rates for the period January 1, 2023 to December 31, 2023, 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: APRIO LLC - EXAMPLE

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 --

- (1) Certify any proposal to establish or modify final indirect cost rates;
- (2) Use the format in paragraph (c) of this clause to certify; and
- (3) Have the certificate signed by an individual of the Contractor's organization at a level no lower than a vice president or chief financial officer of the business segment of the Contractor that submits the proposal.

(b) Failure by the Contractor to submit a signed certificate, as described in this clause, may result in final indirect costs at rates unilaterally established by the Contracting Officer.

(c) The certificate of final indirect costs shall read as follows: (see above)

# Statute of Limitations

*Note: Must be signed by an Executive  
Level Person in the Company*

# Statute of Limitations

This means there are 3 areas contractors need to be aware of:

**01.**

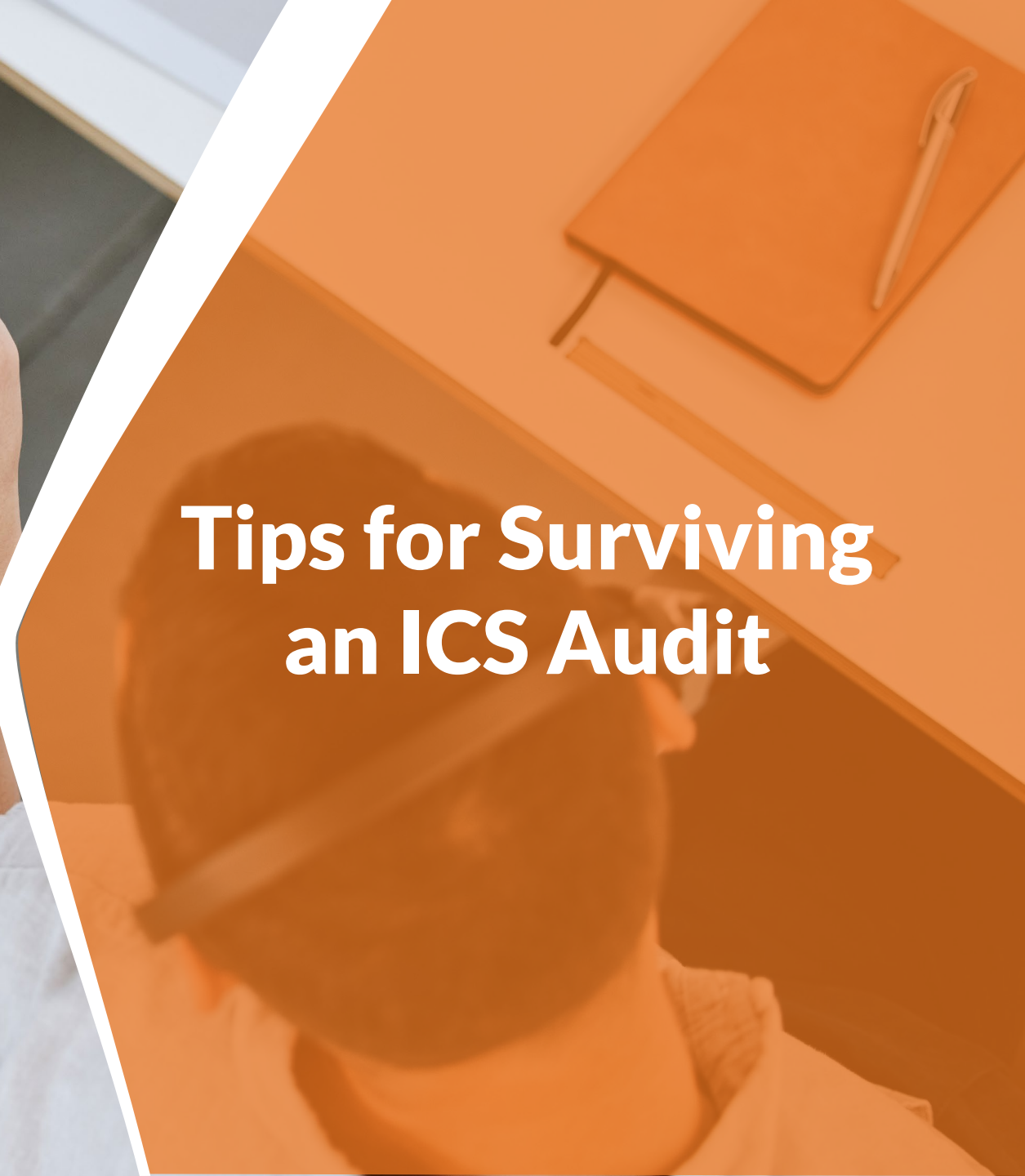
This is encouraging DCAA to deem contractors ICS as inadequate and have them recertify.

**02.**

Contractors should not recertify unless the revisions change the indirect rates proposed. This will restart the clock.

**03.**

Contracting Officers not likely to negotiate with contractors when the clock is running out. The Government will unilaterally determine the rates.



# Tips for Surviving an ICS Audit

# Tip 1

## Adequate Incurred Cost Submission

- N Proof the Trial Balance to Submission
- N Verify that all unallowables have been removed
- N Go to each Tab and validate information ties to related schedules
- N Verify formulas and hyperlinks throughout
- N Make sure to sign AND date Schedule N
- N Save all data used to develop ICS
- N Pull DCAA's checklist and verify before submission ([http://www.dcaa.mil/incurred\\_cost\\_checklist.html](http://www.dcaa.mil/incurred_cost_checklist.html))



# Tip 2

## Compiled Data for Audit

- N** Have support data available, accessible and with copy of submission.
- The audit of the incurred cost submission will likely occur at a later date (often much later).
  - The individual who prepared the submission or support data may not be accessible or even working for your organization
  - Appoint a point of contact who will manage the audit, review all data provided and follow up on all requests.



*Stephen Covey's, The 7 Habits of Highly Effective People  
"Begin with the End in Mind"*



# Tip 3

## Common Pitfalls to Avoid

- N Lack of adequate documentation to support cost
- N Lack of description of work provided by subcontractors & consultants
- N Reclassification of time without proper description & approval
- N Out of period costs claimed
- N Forgetting to put certain Unallowables in the base of G&A
- N Forgetting to account for Indirect Rate Ceilings



# Tip 4

## Common Questioned Costs

- N Business Meetings
- N Employee Moral
- N Executive Compensation
- N Bonuses
- N Credit Card Expenses (Travel & Per Diem)
- N Marketing Costs vs Advertising
- N Leased Autos
- N Legal Fees
- N Management Fees



# DCAA Resources & Audit Programs

Go to DCAA web site: <http://www.dcaa.mil/>

## D Under Guidance

- Contract Audit Manual (CAM) – Chapter 6 Incurred Cost Audit Procedures
- Selected Area of Cost Guidebook: FAR 31.205 Cost Principles
- FAR Cost Principles Guide

## D Directory of Audit Programs

- Risk Assessment Checklist
- Audit Program for Incurred Costs - Post Year End Incurred Cost Audit – AP 10100 (Feb 2016)

## D Audit Process Overview

- Information for Contractors

## D Under Checklist and Tools

- Incurred Cost Electronically (ICE) (customize to contractor indirect rate structure)
- Incurred Cost Adequacy Checklist



*Today's presenter*

# Donna Dominguez

*Government Contract Compliance Leader & Advisory Partner, Aprio*



Donna Dominguez is a director in Aronson LLC's Government Contract Services Group, where she provides a wide range of financial compliance advisory services for government contractors. She is experienced in matters related to Federal Acquisition Regulations (FAR), cost accounting standards (CAS), incurred cost submissions, DCAA/cognizant audit support, provisional billing rates, establishing/revising indirect rate structures and cost proposal support.

Donna works with contractors to help them grow their business while keeping their accounting systems adequate in the eyes of the government and their billing systems current and relevant. She is also involved in supporting the government contracting community as a frequent guest speaker on a variety of compliance topics.

Donna earned her bachelor's degree in accounting from the University of Maryland and has completed additional coursework in contracts administration. She is a contributor to Aronson's Fed Point blog and has co-authored articles for NCMA Contract Management Magazine.

[LinkedIn](#)

## Today's presenter

# Tram Vo

*Senior Manager, Government Contracting, Aprio*



Tram Vo is a Senior Manager in Aprio LLP's Government Contracting Services Group with 20+ years of experience and knowledge of Federal Acquisition Regulations (FAR). Tram began her career with the Defense Contract Audit Agency (DCAA) working with contractors on Incurred Cost Submission audits, Forward Pricing Proposals, Defective Pricing, Cost Accounting Standard Review, Floor checks, and more.

She also has experience with both small and large contractors and understands the critical compliance issues and needs of each. She has extensive experience with monthly accounting & billings, provisional bill rates, adequate accounting systems, estimating systems, and contract administration.

[LinkedIn](#)

# Thank you!



**Donna Dominguez**

*Partner, Government Contract Services Group*

301-222-8232

[donna.dominguez@aprio.com](mailto:donna.dominguez@aprio.com)



**Tram Vo**

*Senior Manager, Government Contracting*

240-364-2616

[tram.vo@aprio.com](mailto:tram.vo@aprio.com)



LIABILITIES  
Stockholders' Equity

$$FUTURE VALUE$$
$$A = P \left[ 1 + \frac{r}{n} \right]^{nt}$$

Debt-to-assets Ratio

$$= \frac{TOTAL LIABILITIES}{Total Assets}$$

T-ACCOUNT	
DEBIT	CREDIT

Simple Interest

$$I = Prt$$

## About Aprio

Since 1952, clients throughout the US, and across more than 50 countries have trusted Aprio for guidance on how to achieve what's next. As a premier business advisory and CPA firm, Aprio delivers advisory, assurance, tax, outsourcing, staffing and private client services to build value, drive growth, manage risk and protect wealth. With proven expertise and genuine care, Aprio serves individuals and businesses, from promising startups to market leaders alike.

# A Recognized Leader

“A Best of the Best Accounting Firm” and Best Place to Work  
#1 Fastest growing accounting firm in the nation  
#26 largest accounting firm in the nation



# The Aprio Way

31 Fundamentals define  
& guide our culture

1. Act with integrity
2. Do what's right for the client
3. Look forward
4. Be a fanatic about response time
5. Honor commitments
6. Be proactive
7. Be the expert advisor
8. Pay attention to the details
9. Provide a great client and team member experience
10. Value Differences
11. Deliver results
12. Practice blameless problem-solving
13. Listen generously
14. Speak straight
15. Get clear on expectations
16. Be curious
17. Be relentless about improvement
18. "Bring it" every day
19. Think one Aprio
20. Work smart
21. Share information
22. Embrace change
23. Walk in your clients' shoes
24. Be kind
25. Make a difference
26. Build meaningful personal relationships
27. Think and act like an owner
28. Be a brand ambassador
29. Celebrate success
30. Respect confidentiality
31. Keep things fun

# Our business **mindset**



Radical disruptors  
and leaders in a  
traditional profession



Delight in  
challenging the  
status quo



Focus on  
how to best  
cross-serve clients



Fail fast and  
fail often, take  
calculated risks

# Aprio today\*



**2,100+**  
Team  
Members



**194**  
Partners



**#1**  
Fastest Growing  
Top-100 firm



**35+**  
Services



**60+**  
Languages  
Spoken



Clients in  
**50+**  
Countries



**#26**  
In the U.S.



**25%**  
Team Member  
Diversity



**900**  
Retirement  
Plans



**\$1.6**  
Billion in AUM



**6 VC**  
Investments



Morison  
Global

\*As of Nov 8, 2023

# Team members serving clients across the nation and around the globe



United States

1550+

18 Locations



Philippines

200+



Canada

3



United Kingdom

2



Netherlands

1



New Zealand

1



South Africa

2



Colombia

12

## US and International Markets:

- Atlanta, GA (3 offices)
- Birmingham, AL (2 offices)
- Boston, MA
- Denver, CO
- Fairfield, NJ
- Fort Lauderdale, FL
- Greensboro, NC
- Hackensack, NJ
- Charlotte, NC (2 offices)
- Mount Airy, NC
- Nashville, TN
- New York, NY
- Raleigh, NC
- San Francisco, CA
- Valdosta, GA
- Walnut Creek, CA
- Washington, D.C. Metro
- Colombia
- The Philippines



# A diverse client base



**Mid-market  
CEOs/CFOS  
business owners**



**High net-worth  
Individuals**



**Small businesses  
and entrepreneurs**



**Public companies  
(Specialty services)**



**Private equity  
firms**



**Individual tax  
clients**



# We are advisors across industries, services and capabilities



## SPECIALTY TAX

- Employee Retention Credit
- Paycheck Protection Program
- State and Local Tax
- Tax Credits and Incentives
- International Tax
- Transfer Pricing
- Tax Controversy Services

## DIGITAL ADVISORY

- Data and Analytics
- Blockchain
- Digital Transformation
- Risk Management Advisory
- Cybersecurity Advisory
- Information Assurance
- Business Applications (ERP)

## OUTSOURCING

- Accounting
- Payroll
- HR & People Advisory
- IT & Financial Staffing
- Indirect Tax
- Fractional CFO
- Financial Planning & Analysis

## BUSINESS PERFORMANCE

- Business Brokerage
- Transaction Advisory
- Business Valuation
- Technical Accounting Consulting
- Treasury Optimization Services
- ESG Services

# Specialty services

## **SPECIALTY TAX**

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