

EXECUTIVE CHOICES

Contract Administration & Compliance Pack

Editable controls for performance, changes, claims, ethics, cyber, labor, accounting, and closeout
Professional review required before use

CONTROLLED STARTER MATERIALS

These tools do not replace the contract, clauses, wage determination, agency direction, legal advice, accounting advice, or cybersecurity assessment. Confirm applicability, notice deadlines, authority, current forms, certification language, and required approvals before submission or implementation. Never treat informal direction as authorization to change scope, price, schedule, security, or personnel.

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1. Applicability and Control Map

Control area	Trigger / question	Owner	Required evidence
Changes / claims	Did direction, delay, condition, quantity, schedule, or cost change?		Contract, notice, daily record, cost and schedule support
Ethics / disclosure	Does the contract contain ethics, hotline, disclosure, kickback, gifts, or lobbying duties?		Code, training, reports, investigations, decisions
Cyber / CUI	Will a system process, store, transmit, or protect FCI/CUI or other restricted data?		System boundary, SSP, POA&M, incident and access records
Labor	Do wage determinations, service/construction labor, EEO, veterans, disability, or leave rules apply?		Classifications, payroll, fringe, posters, notices, approvals
Accounting / pricing	Is the award cost-reimbursement, T&M, flexibly priced, certified, or audit-supported?		Time, cost, indirect-rate, invoice, funding, and approval records
Subcontracting	Is a plan, consent, competition, reporting, flow-down, or status representation required?		Approved plan, reports, source file, representations

- ☐ Assign a contracts owner and backup
- ☐ Create one controlled contract repository
- ☐ Load every clause, deliverable, option, notice, and reporting date
- ☐ Record who may communicate with the Contracting Officer
- ☐ Escalate conflicts among the contract, direction, policy, and actual performance

2. Change Event and Notice File

Contract / order: _____

Event number: _____

Date and time discovered:

Direction source: _____

Affected CLIN / task: _____

Notice deadline: _____

Authorized contracts lead:

Event fact	Contemporaneous record
What changed or differed	
Who said / did what	
Contract baseline	
Affected work and dependencies	
Cost / labor / material impact	
Schedule / critical-path impact	
Mitigation taken without waiving rights	
Written direction received	

Potential change notice starter

Subject: Notice of Potential Change - [CONTRACT / EVENT]. [FACTUAL EVENT] may affect [SCOPE / COST / SCHEDULE] under [CONTRACT BASELINE]. The observed impact is [FACTS]. Please provide written direction regarding [QUESTION]. Pending authorized direction, the contractor will [SAFE CONTINUATION / MITIGATION] and preserve contemporaneous records. This is not a final request for adjustment and does not waive any right or remedy.

3. Equitable Adjustment and Claim Readiness

Element	Evidence / decision
Contract basis	Exact clause, specification, order, modification, or legal basis
Entitlement facts	Chronology, notices, direction, knowledge, causation, and mitigation
Quantum	Direct labor/material/ODC, indirect costs, escalation, profit/fee treatment, credits, and no duplication
Schedule	Baseline, updates, critical path, concurrency, excusable/compensable delay analysis
Records	Daily reports, correspondence, photos, logs, invoices, payroll, quotes, calculations
Authority	Signer and certification authority confirmed
Deadline	Contractual notice, REA, claim, appeal, and final-payment timing confirmed

Precise adjustment requested:

Amount / schedule requested:

Prior payments or related requests:

Supporting attachments: _____

Legal review: _____

Finance review: _____

Executive approval: _____

- ☐ Use the exact certification required by the controlling clause and current law
- ☐ Separate estimated from actual cost
- ☐ Exclude already reimbursed or separately claimed cost
- ☐ Reconcile the narrative, schedule, and cost model; preserve privilege and protected work product with counsel

4. Stop Work, Cure, Show Cause, Suspension, and Termination

Action	Immediate controlled response
Stop-work / suspension	Authenticate the order; identify authority, scope, effective time, affected personnel/property, preservation, mitigation, and restart conditions.
Cure notice	Calendar deadline; form a response team; investigate each allegation; preserve evidence; correct safely; document cause, impact, and prevention.
Show-cause notice	Address facts and responsibility without unsupported admissions; document excusable causes, mitigation, capability, and requested decision.
Termination for convenience	Stop or continue only as directed; notify tiers; protect property; segregate cost; cancel commitments; inventory; prepare settlement.
Termination for default	Escalate immediately to counsel and leadership; preserve defenses, notices, performance proof, cure, excusable delay, and appeal dates.

Government action / date: _____

Response deadline: _____

Continuing work authorized: _____

Subcontractor notices: _____

Property / data disposition: _____

Cost segregation code: _____

Counsel / insurer notice: _____

5. CPARS and Past-Performance Response

Evaluation area	Government statement	Contractor evidence	Proposed factual response
Quality			
Schedule			
Cost control			
Management			
Regulatory compliance			
Small-business utilization			

- ☐ Confirm the evaluation period, contract, order, and responsible entity
- ☐ Use contract facts, metrics, acceptances, modifications, and dated communications
- ☐ Correct inaccuracies without attacking individuals
- ☐ Acknowledge supported issues and document corrective action
- ☐ Meet the system response deadline and retain the receipt
- ☐ Update the capability statement and lessons-learned file after final disposition

6. Written Code of Business Ethics Starter

- ☐ Leadership commitment to lawful, honest, fair, and accurate government-contract performance
- ☐ No bribery, kickbacks, gratuities, improper gifts, procurement-integrity violations, false claims, or false statements
- ☐ Accurate timekeeping, cost charging, invoices, certifications, records, and representations
- ☐ Protection of Government, customer, teammate, personal, proprietary, classified, FCI, and CUI information
- ☐ Conflict, outside-employment, financial-interest, and organizational-conflict disclosure
- ☐ No retaliation for lawful reporting; accessible internal and Government reporting channels
- ☐ Due diligence for employees, agents, consultants, suppliers, and subcontractors
- ☐ Prompt preservation, escalation, investigation, corrective action, cooperation, and required disclosure

Ethics officer: _____

Alternate / hotline: _____

Board / owner approval date:

Training population: _____

Annual certification date:

Records location: _____

Signatures

Party	Authorized signer / title	Signature	Date
CHIEF EXECUTIVE			
ETHICS / COMPLIANCE OFFICER			

7. Mandatory Disclosure and Investigation Workflow

Step	Owner	Due	Evidence / privilege status
Receive and protect report			
Conflict / independence check			
Counsel and privilege decision			
Preservation / legal hold			
Investigation plan and interviews			
Credible-evidence and disclosure analysis			
Agency OIG / CO / other notice			
Corrective action and repayment			
Closure, lessons, monitoring			

- ☐ Do not promise confidentiality beyond what law and the investigation permit
- ☐ Protect lawful reporting and prohibit retaliation
- ☐ Limit access to need-to-know personnel
- ☐ Use counsel-approved disclosure language and recipients
- ☐ Track continuing disclosure duties after the initial report

8. Gifts, Kickbacks, Lobbying, and Conflict Register

Date	Person / entity	Type	Value	Government / opportunity link	Decision / approver

- ☐ Preapproval threshold and prohibited categories are defined
- ☐ Meals, travel, entertainment, discounts, jobs, referrals, and charitable requests are covered
- ☐ Kickback concerns are escalated immediately
- ☐ Lobbying activity and funding source are screened before engagement
- ☐ Personal and organizational conflicts are disclosed and mitigated
- ☐ Political activity is kept separate from contract charging and Government resources

9. Cybersecurity System Plan and Evidence Index

System / boundary item	Current fact / evidence	Owner	Gap / due
Information types and contract clauses			
CUI/FCI system boundary and data flow			
Assets, users, locations, connections			
Access, MFA, least privilege, remote work			
Configuration, patching, malware, logging			
Encryption, media, backup, disposal			
Personnel security and training			
Supplier / cloud / lower-tier controls			
Assessment, SSP, POA&M, SPRS/CMMC evidence			

- ☐ Do not accept CUI until the authorized environment is verified
- ☐ Keep the SSP factual and system-specific
- ☐ Track every unresolved requirement in a controlled POA&M only where permitted
- ☐ Map each assertion to dated objective evidence
- ☐ Obtain security review before changing systems or suppliers

10. Cyber Incident and CUI Response Playbook

Phase	Required action	Owner / evidence
Detect	Record source, time, systems, accounts, indicators, and reporter; do not destroy volatile evidence.	
Contain	Use approved isolation and credential steps while preserving mission and evidence.	
Assess	Determine information type, contract, system boundary, scope, continuing risk, and reporting clocks.	
Notify	Use the exact contract/agency channel and deadline; coordinate counsel, security, insurer, prime, and affected tiers.	
Preserve	Maintain images, logs, malware samples, chain of custody, communications, decisions, and required media.	
Recover	Authorize restoration, validate controls, monitor recurrence, and record operational impact.	
Close	Complete root cause, corrective action, continuing notices, lessons, and evidence retention.	

24/7 security contact: _____

Legal / privacy contact: _____

Agency / prime reporting route:

Cyber insurer: _____

Forensic provider: _____

Evidence repository: _____

11. Labor Standards Applicability and Wage File

Question	Answer / evidence
Which labor clauses and wage determination are incorporated?	
Where will each employee perform?	
Which service/construction classifications apply?	
Are any classifications missing or conformance requests needed?	
What wages, fringes, leave, notices, posters, and CBA terms apply?	
Which lower tiers perform covered work?	
What payroll/time records and retention period are required?	
Who monitors modifications and updated wage determinations?	

- ☐ Use the incorporated wage determination, not a generic online rate
- ☐ Separate exempt/nonexempt and covered/noncovered analysis
- ☐ Notify employees as required
- ☐ Flow applicable duties to lower tiers
- ☐ Reconcile time, payroll, fringe, invoice, and general ledger records

12. Classification, Fringe, Payroll, and Timekeeping Tracker

Employee / ID	Contract / CLIN	Work location	Classification	Base wage	Fringe method	Hours / approval

- ☐ Employees record all time daily by contract/indirect code
- ☐ Supervisors approve after the employee submits
- ☐ Corrections preserve original entry, reason, date, and approver
- ☐ Overtime authorization and treatment are documented
- ☐ Uncompensated overtime and total-time accounting are addressed where applicable
- ☐ Payroll, labor distribution, invoice, and job-cost records reconcile

13. Construction Labor, EEO, and Workforce Compliance

Area	Applicability decision / controlled evidence
Construction wage determination	
Certified payroll and basic records	
SF 1413 / lower-tier acknowledgment	
Apprentice / trainee approval	
Safety and site requirements	
EEO clauses and notices	
Written affirmative-action program	
Veterans / disability requirements	
Drug-free workplace / leave / posters	

- ☐ Confirm current thresholds and coverage with qualified labor counsel
- ☐ Do not collect protected demographic or medical data without an approved purpose and controls
- ☐ Assign confidential record storage and retention
- ☐ Monitor lower-tier compliance and corrective action

14. Government-Contract Accounting and Timekeeping Controls

Control	Policy / evidence	Owner	Frequency
Chart of accounts and project codes			
Direct vs. indirect cost			
Labor entry, approval, correction			
Purchasing and subcontract cost			
Unallowable-cost identification			
Billing reconciliation			
Funding / ceiling / limitation alerts			
Record retention and audit access			

- ☐ Train every employee before charging time
- ☐ Never direct an employee to move cost to fit a budget
- ☐ Identify unallowable cost at entry and in the general ledger
- ☐ Reconcile subsidiary records to the ledger
- ☐ Document management review and correction

15. Indirect Rates, Pricing Support, Invoices, and Cash

Pool / base	Budget	Actual	Forecast	Rate	Variance / action
Fringe					
Overhead					
G&A					
Other					

Invoice control	Completed / evidence
Correct contract, CLIN, period, format, rate, and funding	
Accepted deliverables and authorized travel/ODCs	
Labor, subcontract, material, and indirect support reconciled	
Prior billings, credits, retainage, and cumulative totals reconciled	
Finance, program, and contracts approvals recorded	
Submission, acceptance, rejection, payment, and aging tracked	

Funded backlog: _____

Unbilled amount: _____

Accounts receivable: _____

Next limitation notice: _____

Cash-risk action: _____

16. Small-Business Subcontracting Plan and Reporting

Use only when the solicitation, contract, business size, and applicable rules require a subcontracting plan or related reporting. Small-business concerns are generally treated differently; confirm the current clause and direction.

Category	Planned dollars	% subcontracted	% total contract	Actual	Gap / action
Small business					
SDB					
WOSB					
HUBZone					
SDVOSB					
VOSB					

- ☐ Plan administrator and duties identified
- ☐ Source-development and outreach actions documented
- ☐ Status representations are current and retained
- ☐ Flow-down and lower-tier plan duties are checked
- ☐ ISR/SSR or agency reports are calendared and reconciled
- ☐ Late-payment and reduced-payment reporting duties are monitored
- ☐ Corrective action is documented when goals are missed

17. Government Property and Quality Controls

Property record	Identifier / description	Location / custodian	Condition / use	Disposition / evidence

Quality control	Requirement / evidence
Inspection / acceptance criteria	
Quality plan / procedures	
Deliverable review and release	
Nonconformance / corrective action	
Supplier quality and traceability	
Government surveillance / audit	

18. Export, Sourcing, Bonding, Insurance, and Safety

Screen	Decision / evidence	Owner	Renewal / monitor
Export-controlled items/data/persons/destinations			
Domestic sourcing / country-of-origin clauses			
Excluded / sanctioned parties			
Supply-chain provenance and counterfeit prevention			
Bid / performance / payment bonds			
Insurance limits, endorsements, notices			
Safety plan, training, incidents, OSHA/agency duties			

- ☐ Use specialist review before handling export-controlled technical data
- ☐ Validate sourcing at item/component level when required
- ☐ Monitor supplier changes
- ☐ Calendar bond, insurance, license, and safety-document expirations

19. Continuity, Organizational Change, and Novation

Continuity item	Owner	Recovery objective / alternate	Test / evidence
Key personnel and succession			
Facilities and utilities			
Systems and communications			
Critical suppliers and logistics			
Records, backups, and cyber recovery			
Government and prime communications			

Organizational change / novation checklist

- ☐ Identify merger, sale, transfer, restructuring, name, ownership, banking, or control change
- ☐ Review anti-assignment, novation, change-of-name, size/status, OCI, security, and consent duties
- ☐ Notify counsel, contracts, finance, security, insurers, surety, lenders, primes, and Government as authorized
- ☐ Prepare acquisition documents, asset/liability schedules, affected contracts, approvals, and representations
- ☐ Update SAM, CAGE, banking, invoicing, registrations, licenses, and controlled records only through approved processes

20. Master Calendar and Official Reference Points

Requirement	Owner	Due / frequency	Evidence / system	Escalation

Official source	Use	Link
Acquisition.gov FAR	Current acquisition regulations and clauses	https://www.acquisition.gov/far
FAR 52.203-13	Ethics code, internal controls, and disclosure clause	https://www.acquisition.gov/far/52.203-13
FAR 52.219-9	Applicable subcontracting-plan requirements	https://www.acquisition.gov/far/52.219-9
FAR 52.222-41	Service Contract Labor Standards clause	https://www.acquisition.gov/far/52.222-41
NIST CUI / SP 800-171	CUI safeguarding requirements and resources	https://csrc.nist.gov/projects/protecting-controlled-unclassified-information/sp-800-171
SAM.gov	Entity, exclusions, opportunities, contract and wage data	https://sam.gov
DOL / OFCCP	Wage, workplace, and federal-contractor compliance	https://www.dol.gov/agencies/ofccp
SBA Contracting	Small-business programs, size, JV, and assistance	https://www.sba.gov/federal-contracting