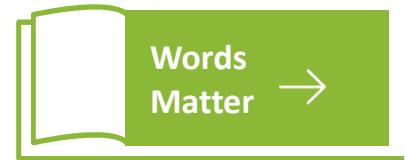


**FAR/DFARs - How to
save time and
automate your
compliance process**

COBHAM

VisibleThread

Gartner
COOL VENDOR



Operational Notes



CALL WILL LAST ABOUT **45 MINUTES**.



PLEASE ASK ANY QUESTIONS USING THE '**QUESTIONS**' FACILITY.



WE'LL MAKE THE **RECORDING** AVAILABLE IN NEXT FEW DAYS. WE'LL MAIL YOU ONCE AVAILABLE.



WE'LL MAKE THESE **SLIDES** ALSO AVAILABLE.



Q&A AT END

A tale of 2 parts

Part 1 – How Cobham apply Automation & the Benefits
Kyle Peterson of Cobham

Part 2 – In action: How to actually create the FAR dictionary & running
it on a contract



VisibleThread Use Case: Cobham
Mission Systems – Orchard Park

November 12, 2018

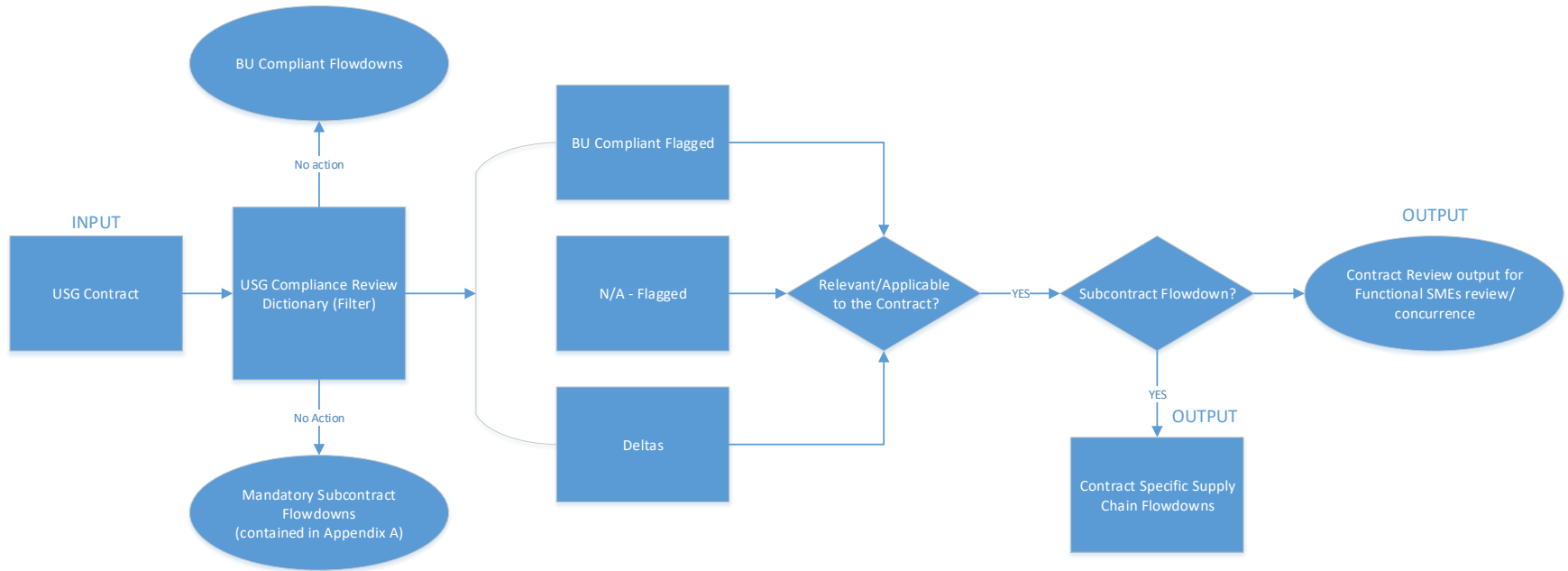
Kyle Peterson

- Cobham faced challenges in manually creating a Site specific solution:
 - Capture all applicable and mandatory FAR/DFARs
 - Ensure site compliance with customer-contract specific Clauses
 - Ensure FAR/DFARs flowdowns to supply chain capture all customer-contract specific Clauses
- **Evergreen Solution:**
 - Identify new and emerging FAR/DFARs Clauses embedded in Customer RFPs and Contracts that are not currently captured in Cobham's standard subcontract flowdown document

- 2 main usage modes at Orchard Park
 - Document compare
 - Run two revisions of the same document and VT will highlight any deletions, additions and modifications
 - USG Contract Review
 - FAR-DFARS compliance and flowdown to subcontracts
 - Key tool to achieve this is the VT dictionary and related “shred” function

Category	Count	Checkbox
USG Compliance Review		<input type="checkbox"/>
+ Catch All	32	<input type="checkbox"/>
+ Mandatory Flowdown	16	<input type="checkbox"/>
+ BU Compliant	11	<input type="checkbox"/>
+ BU Compliant - Flagged	9	<input type="checkbox"/>
+ Non-Applicable - Flagged	1	<input type="checkbox"/>
+ Non-Compliant/In Process		
+ Non-Applicable		

Contract "Shred"



- Clear deliverable
- Excel format allows the filtering and manipulation of the flowdowns as required
- Allows the creation of a contract specific review checklist prior to solicitation response
 - Tied to functional owners
 - Tailored to a manageable size

Clear, Actionable Output



252.245-7001	Tagging, Labeling, and Marking of Government-Furnished Property	Operations	<u>Clarification Required:</u> is Cobham using any USG-furnished material/property for this effort? N/A if no.
252.246-7007	Contractor Counterfeit Electronic Party Detection and Avoidance System	Supply Chain/Quality	<u>Clarification Required:</u> Does the Cobham deliverable contain any electronic parts? N/A if no.
252.211-7003	Item Unique Identification and Valuation	Quality	<u>Notification Obligation:</u> Cobham must provide unique item identifier for all delivered items under the contract. Markings must be in accordance with MIL-STD-130.
252.225-7004	Reporting of Contract Performance Outside the US and Canada – Submission after Award	Sales/Supply Chain	<u>Notification Obligation:</u> Cobham must alert the CO if it, or a first tier subcontractor will perform any part of this contract outside the US or Canada that exceeds \$700k in value.
252.225-7001	Buy American and Balance of Payments Program	Supply Chain	<u>Advisory:</u> Cobham to deliver domestic end products or a qualifying country end product (a list of qualifying countries can be provided).

"Delta" Flowdown Case Study

52.203-19 Prohibition on Requiring Certain Internal Confidentiality Agreements or Statements



- During a USG Contract Review, the contract contained a FAR which was not picked up during the shred
- This FAR turned out to be a mandatory USG flowdown for all subcontracts
 - This FAR was not located in our Appendix A standard PO subcontract flowdown document (which led to the Mandatory Flowdown dictionary not highlighting it in the shred)
- The FAR was added to the subcontract flowdown document, the Site Compliance Matrix as well as our Mandatory Flowdown dictionary

- VT document shredding drastically reduces the amount of manual contract review
 - Efficiently highlights clauses which need to be addressed and prevents unnecessary effort
 - Allows compartmentalization of FAR-DFARs Clauses where compliance has already been “cleared” eliminating distraction and “noise” in the contract review.

- Dictionaries are living entities which can be updated in real time as business units are exposed to new FARS-DFARS
- Important to remember that VT does not think for you; it is a tool which targets the Contract Administrator's effort to highlight and respond to FARS-DFARS which affect the business

- Initially, it was challenging getting the Sales team to engage the Contracts team early on in the contracting process
 - C&C's swift and actionable turnaround of reviews thanks to VT has broken down this barrier
 - Sales team colleagues are appreciative of how C&C is helping remove some of their contract review nightmares
- The Sales and Procurement teams are engaging with C&C much earlier in the RFP/RFQ and Booking sequence
 - More questions, more cross-functional interaction

Part 2

How to actually create the FAR dictionary &
running it on a contract

