Audit
Report

OFFICE OF THE INSPECTOR GENERAL

TRUTH IN NEGOTIATIONS ACT REVISED DOLLAR THRESHOLD

Report No. 94-171

August 1, 1994

This special version of the report has been revised to omit contractor sensitive and Privacy Act data.

Department of Defense

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Acronyms

DCAA  Defense Contract Audit Agency
FAR  Federal Acquisition Regulation
August 1, 1994

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR ACQUISITION AND TECHNOLOGY
DIRECTOR, DEFENSE PROCUREMENT
DEPUTY UNDER SECRETARY OF DEFENSE (ACQUISITION REFORM)
DEPUTY UNDER SECRETARY OF DEFENSE (LOGISTICS)
ASSISTANT SECRETARY OF THE NAVY (FINANCIAL MANAGEMENT)
ASSISTANT SECRETARY OF THE AIR FORCE (FINANCIAL MANAGEMENT AND COMPTROLLER)
DIRECTOR, DEFENSE CONTRACT AUDIT AGENCY
DIRECTOR, DEFENSE LOGISTICS AGENCY
AUDITOR GENERAL, DEPARTMENT OF THE ARMY


We are providing this audit report for your information and use. We performed the audit in response to Public Law 101-510, "National Defense Authorization Act for Fiscal Year 1991," section 803(b)(1), which requires the Inspector General, DoD, to conduct a review of the effects of the increase in the threshold for submission of cost or pricing data from $100,000 to $500,000 after the increased threshold has been in effect for 3 years.

Because this report contains no findings or recommendations, written comments were not required of management and none were received.

The courtesies extended to the audit staff are appreciated. If you have any questions on this audit, please contact Mr. Richard B. Jolliffe, Audit Program Director, at (703) 604-9202 (DSN 664-9202), or Mr. Timothy J. Staehling, Audit Project Manager, at (703) 604-9254 (DSN 664-9254). Appendix E lists the distribution of this report. The audit team members are listed inside the back cover.

[Signature]

Robert J. Lieberman
Assistant Inspector General for Auditing

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Office of the Inspector General, DoD

Report No. 94-171
(Project No. 3CA-5033)

August 1, 1994

TRUTH IN NEGOTIATIONS ACT
REVISED DOLLAR THRESHOLD

EXECUTIVE SUMMARY

Introduction. The audit was performed in response to Public Law 101-510, "National Defense Authorization Act for Fiscal Year 1991," section 803(b)(1), which requires the Inspector General, DoD, to conduct a review of the effects of the increase in the threshold for submission of cost or pricing data from $100,000 to $500,000 after the increased threshold had been in effect for 3 years.

Objectives. The primary audit objective was to determine whether the increased threshold improved the acquisition process or resulted in any adverse risks to the Government. Specifically, the review addressed whether paperwork was reduced, whether the Government realized financial or other savings, and whether the number of contractors participating in the Defense contracting process increased. The review also determined whether the information available to contracting officers was adequate for proposals in which certified cost or pricing data were not required.

Audit Results. Opinions were divided on the type and extent of the increased threshold’s impact, especially with regard to paperwork reduction and savings. Both the contracting officers and contractors believed that generally adequate information remained available to contracting officers in those cases for which certified cost or pricing data were not required. Although the threshold had been increased to $500,000, some contracting officers continued to request detailed cost or pricing data and certifications from contractors as though the threshold was still at the $100,000 level. The issue of contracting officers continuing to request detailed cost or pricing data and certifications from contractors was addressed in Inspector General, DoD, Report No. 94-004, "Contracting Officer Price Analyses," October 15, 1993. The impact of the threshold increase is also masked by other factors such as the downsizing of the DoD budget, the consolidating of contractors within the Defense industry, and Defense contractors reevaluating business strategies to focus more on commercial products and markets.

Internal Controls and Potential Benefits. The internal controls applicable to the audit objectives were deemed to be effective in that no material deficiencies were disclosed by the audit. The report contains no potential monetary benefits.

Management Comments. Because this report contains no findings or recommendations, written comments were not required of management and none were received.
# Table of Contents

**Executive Summary** |  
---|---
**Part I - Introduction** |  
  Background | 2  
  Objectives | 2  
  Scope and Methodology | 2  
  Internal Controls | 3  
  Prior Audits and Other Reviews | 3  
**Part II - Results of Audit** |  
  Review of Impact of Threshold Increase | 6  
**Part III - Additional Information** |  
  Appendix A. Summary of DoD Contracting Organization Questionnaires | 12  
  Appendix B. Summary of Contractor Interview Responses | 13  
  Appendix C. Summary of Defense Contract Audit Agency Reviewed Proposals Priced Between $100,000 and $500,000 | 20  
  Appendix D. Organizations Visited or Contacted | 21  
  Appendix E. Report Distribution | 24  

This report was prepared by the Contract Management Directorate, Office of the Assistant Inspector General for Auditing, Department of Defense.
Part I - Introduction
Introduction

Background

The audit was performed in response to Public Law 101-510, "National Defense Authorization Act for Fiscal Year 1991," section 803(b)(1), which requires the Inspector General, DoD, to conduct a review of the effects of the increase in the threshold for submission of cost or pricing data from $100,000 to $500,000 after the increased threshold had been in effect for 3 years. The FY 1991 Defense Authorization Act changed the Truth in Negotiations Act, included under United States Code, title 10, section 2306 (a)(1), "Truth in Negotiations Act," by increasing the threshold for submission of cost or pricing data from $100,000 to $500,000. The effective date of the increase in the threshold was December 5, 1990, with a sunset provision that returns the threshold to $100,000 after December 31, 1995.


Objectives

The primary audit objective was to determine whether the increased threshold improved the acquisition process or resulted in any adverse risks to the Government. Specifically, the review addressed whether paperwork was reduced, whether the Government realized financial or other savings, and whether the number of contractors participating in the Defense contracting process increased. The review also determined whether the information available to contracting officers was adequate for proposals in which certified cost or pricing data were not required.

Scope and Methodology

We performed the audit at the 8 judgmentally selected DoD organizations and 55 contractors listed in Appendix D. We summarized the results of:

- Government contracting officer questionnaires,
- DoD organization questionnaires,
- interviews with Government administrative contracting officers,
Introduction

- interviews with Defense Contract Audit Agency (DCAA) personnel,

and

- interviews with contractor contracting personnel to determine the
effects of the Truth in Negotiations Act (the Act) increased threshold for
submission of certified cost or pricing data on the Defense contracting
acquisition process. The contract and proposal information we reviewed
covered the period 1989 through 1993.

We performed this economy and efficiency audit from October 1993 through
May 1994 in accordance with auditing standards issued by the Comptroller
General of the United States as implemented by the Inspector General, DoD.
Accordingly, we included such tests of internal controls as were considered
necessary. We did not use computer-processed data or statistical sampling
procedures to perform the audit.

Internal Controls

We evaluated the effectiveness of the internal controls applicable to the
threshold requirement of the Act. We reviewed contracting records,
interviewed contracting personnel, and analyzed completed contracting
organization and contracting officer questionnaires. The audit disclosed no
material internal control deficiencies; therefore, the implementation of the DoD
Internal Management Control Program was not reviewed.

Prior Audits and Other Reviews

Inspector General, DoD, Report No. 94-004, "Contracting Officer Price
Analyses," October 15, 1993, states that DoD contracting officers did not
properly perform or adequately document the use of price analyses to determine
whether contractor proposal prices were fair and reasonable. As a result,
assurances were inadequate that fair and reasonable prices were obtained in all
instances for negotiated contractual actions. Also, contractor and Government
resources were not used economically when detailed cost or pricing data were
obtained for actions priced under $500,000 and then certifications were not
obtained.

Report No. 94-004 recommended that the Military Departments and the Defense
Logistics Agency issue written internal control objectives and verification
techniques that require contracting officers to perform and verify price analyses
using techniques detailed in the Armed Services Pricing Manual, as required by
the Federal Acquisition Regulation (FAR), and document the price analysis
results in the negotiation memorandum. The report also recommended that the
Military Departments and the Defense Logistics Agency issue guidance to
implement the Director, Defense Procurement, December 5, 1990,
memorandum, "Increase in Cost or Pricing Data Threshold," and May 29, 1992, memorandum, "Certified Cost or Pricing Data," to describe those situations requiring certified cost or pricing data in evaluating proposals under $500,000.

The Air Force and the Defense Logistics Agency concurred with the recommendations. The Army did not concur, while the Navy partially concurred with the recommendations. In their final comments on the report, the Navy fully concurred and the Army continued to nonconcur with the recommendations. However, the report states that, according to the audit results, the Army did a better job of performing and documenting price analyses than did the other Military Departments and the Defense Logistics Agency. As a result, no further action was requested on recommendations addressed to the Army.
Part II - Results of Audit
Review of Impact of Threshold Increase

A review of DoD contracting organizations and Government contractors showed that contracting officers and contractors perceived that the increase in the threshold for submission of cost or pricing data from $100,000 to $500,000 had thus far resulted in:

- most DoD contracting organizations experiencing only a marginal reduction in the amount of paperwork required, but most activities realizing at least some savings;
- Government contractors being divided on whether savings and a reduction in the amount of paperwork required had been achieved;
- all DoD organizations and most contractors seeing no incentive for increasing the number of contractors participating in the Defense contracting process; and
- information provided to contracting officers that was generally considered to be adequate in those cases for which certified cost or pricing data were not required.

Furthermore, many contractors also stated that, although the threshold increased to $500,000, some contracting officers continued to request detailed cost or pricing data and certifications from contractors as though the threshold was still at the $100,000 level. The impact of the threshold increase is also masked by other factors such as the downsizing of the DoD budget, the consolidation of contractors within the Defense industry, and Defense contractors reevaluating business strategies to focus more on commercial products and markets.

Background

Purpose of the Truth in Negotiations Act. The Truth in Negotiations Act (the Act) protects the Government against defective pricing by contractors. The Act requires contractors to submit certified cost or pricing data when adequate price competition does not exist. If certified cost or pricing data submitted by the contractor are subsequently found to have been inaccurate, incomplete, or noncurrent as of the effective date of the certificate, the Government is entitled to reduce the price to what it would have been if the contractor had submitted accurate, complete, and current data.

Criteria For Submitting Cost or Pricing Data. FAR 15.804, "Cost or Pricing Data," covers the submission of cost or pricing data by an offerer or contractor. Specifically, FAR 15.804-2, "Requiring Certified Cost or Pricing Data," discusses the requirements for certified cost or pricing data and cites a $500,000 threshold amount requirement only for DoD, National Aeronautics and Space Administration, and the Coast Guard (all other Government agencies are still subject to a $100,000 threshold amount). Further, FAR 15.804-3, "Exemptions From or Waiver of Submission of Certified Cost or Pricing Data,"
discusses the exemptions from or waiver of submission of certified cost or pricing data. FAR 15.804-4, "Certificate of Current Cost or Pricing Data," addresses the requirement for a contractor to execute a Certificate of Current Cost or Pricing Data and refers to FAR 15.801, "Definitions," which defines cost or pricing data.

Results of the Threshold Change on the DoD Contracting Process

The review disclosed that contracting officers and contractors perceived that the increase in the threshold for submission of cost or pricing data from $100,000 to $500,000 resulted in some benefits, but opinions were mixed on the extent of the increased threshold's impact.

Reduction in Government Paperwork. Completed questionnaires received from eight judgmentally selected DoD contracting organizations showed that 6 of the 8 organizations believed that the increased threshold had, thus far, only resulted in a marginal decrease in the amount of paperwork (Appendix A). Only a marginal decrease resulted because some contracting officers apparently still insisted on negotiating a contract price based on detailed cost analyses, even though contractors were not required to certify cost or pricing data for contracts between $100,000 and $500,000. Contracting officers inadequately documented the need for detailed cost and pricing data in either the negotiation memorandum or the contracting file documents. Contracting organizations indicated that they requested Standard Forms 1411, "Contract Pricing Proposal Cover Sheet," (SF 1411s), for actions between $100,000 and $500,000 in support of contractor-submitted cost or pricing data that were not required to be certified. The contracting organizations provided no specific reasons for requesting the SF 1411s under those circumstances.

In contrast, two other contracting activities (both Air Force) indicated a significant decrease in their paperwork.

Reduction in Contractor Paperwork. Interviews with the 55 judgmentally selected contractors showed that 24 (44 percent) of the 55 contractors believed that a reduction in paperwork had occurred for those contract proposal submissions between $100,000 and $500,000 (Appendix B). Of the 24 contractors, 12 claimed savings in paperwork stating that, for contract proposals under $500,000, only summary-level cost data were provided rather than complete detailed cost data by individual element line items. The reduction in paperwork was more substantial for smaller contractors, who did not have sophisticated established accounting and estimating systems. However, 30 (55 percent) of the contractors believed that the amount of paperwork required or generated had not changed noticeably since the threshold increased to $500,000. Of the 30 contractors, 28 stated that Government contracting officers are still requiring the same amount of detailed data as before, even though, in most instances, certifications of cost or pricing data were not requested. This impression was confirmed and addressed in a previous audit, Inspector General, DoD, Report No. 94-004, "Contracting Officer
Price Analyses," October 15, 1993. Larger contractors stated that their internal policies and procedures for developing and reviewing proposals had not changed since the threshold increased and that the process for a $100,000 to $500,000 proposal was no different than the process for a proposal of more than $500,000. One contractor did not respond.

Government Savings Realized. Six of the eight contracting organizations realized financial or other savings, primarily from reductions in procurement administrative lead time (Appendix A). Specifically, the contracting organizations reduced costs by not having to request field pricing support reviews from the administrative contracting officers or audit assistance from DCAA for those contract proposals priced under $500,000. The reduction in audit assistance is evidenced by the significant reduction in the number of proposals that DCAA reviewed after the threshold was increased in 1990 (Appendix C). As another example, savings result from DoD contracting officers performing more price analyses instead of detailed cost analyses for contract proposals under $500,000.

Contractor Savings Realized. Of the 55 contractors, 31 (56 percent) believed that noticeable financial or other savings had occurred for those contract proposal submissions under $500,000 (Appendix B). Specifically, the savings resulted from less interaction with DCAA auditors, prime contractors increased use of price instead of cost analyses on subcontract proposals, and less procurement administrative lead time expended on proposals. The 23 contractors (42 percent) that did not identify any financial or other savings stated that they had not realized any savings directly stemming from the threshold change primarily because the Government has not changed its practice of requesting detailed cost or pricing data and certifications. One contractor did not respond.

Contractor Participation in the Defense Contracting Process. The 8 DoD contracting organizations and 45 (82 percent) of the 55 contractors stated that the increased threshold did not provide incentives for increasing the participation of contractors in the Defense contracting process (Appendixes A and B). Specifically, the contractors stated that the downsizing of the DoD budget and the consolidation of the Defense industry were reducing the participation of contractors in the Defense contracting process. Contractors, primarily the larger ones, stated that, because of the DoD budget reductions, the contractors were now competing for smaller-sized contract awards and competing in areas they had never previously considered. The contractors also stated that the increased competition for the declining DoD budget dollars has caused contractors to reevaluate their business development strategies and possibly focus more on commercial products and markets. Under these circumstances, any impact of the increased threshold is well masked.

Adequacy of Uncertified Contractor Information. All eight of the selected DoD contracting organizations believed that the information provided by contractors was generally adequate for those proposals for which certified cost or pricing data were not required.
Results of DCAA Postaward Reviews. DCAA statistics on postaward reviews for defective pricing during FYs 1991 through 1993 showed that both the number of postaward reviews performed and the instances of reported defective pricing had significantly decreased for contracts under $500,000. The DCAA statistics for those reviews performed on contracts under $500,000 showed that the amount of reported and sustained defective pricing was extremely small compared with the dollar value of the reviewed contracts. DCAA field personnel stated that postaward reviews for contracts under $500,000 were only performed on an exception basis. We concluded from discussions with DCAA headquarters personnel that DCAA postaward review emphasis will continue to be on those contract awards in excess of $500,000.

DoD Contracting Organization and Contractor Opinions on the Threshold Amount. The selected DoD contracting organizations generally agreed that the $500,000 threshold amount is appropriate. The contractors also agreed with the $500,000 threshold or believed that the threshold should be higher.

Results of completed questionnaires from 86 contracting officers at the 8 contracting organizations generally showed that the $500,000 threshold was appropriate as long as the contracting officer continued to have the option to request certified cost or pricing data for contract proposals under $500,000. However, 18 contracting officers did not comment on the appropriate threshold amount, and 12 contracting officers believed that the threshold amount should revert to the $100,000 level. The primary reason for contracting officers wanting to reinstate the $100,000 threshold was to ensure that contractors were required to certify all submitted cost or pricing data for contracts of more than $100,000.

Of 55 contractors, 50 (91 percent) recommended that the threshold amount either remain at the current $500,000 level or be increased to a higher level. Five (9 percent) of 55 contractors expressed no opinion on the threshold amount. The contractors believed that the $500,000 level adequately accounted for inflationary experience since the early 1960s, when the $100,000 threshold amount was adopted by the Government. Contractors also noted that contracting officers continue to have the option of requesting certified cost or pricing data for submitted contract proposals between $100,000 and $500,000.

Requirement for Cost or Pricing Data in Competitive Acquisitions. Ten contractors stated that they were required to submit SF 1411s and detailed cost or pricing data when the solicitation was issued on a competitive basis, contrary to the FAR. Specifically, the solicitation stated that the contract would be based on competition (awarded to the lowest bidder); however, once the contracting officer selected the contractor based on the competitive proposals, the contract would then be changed to a negotiated contract with the contractor then having to submit certified cost or pricing data. The contractors claimed that their proposal prices were already low because of the competition factor and that submitting the additional cost or pricing data wasted time and made the proposal process more costly. The contractors stated that they submitted and certified the additional cost or pricing data so as not to lose the contract award. However, the contractors did not provide specific details on this issue.
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Part III - Additional Information
### Appendix A. Summary of DoD Contracting Organization Questionnaires

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*Contracting officers are realizing savings from less effort in evaluating proposals priced between $100,000 and $500,000.*
### Appendix B. Summary of Contractor Interview Responses

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See footnotes at end of appendix.

*Contractor confidential or proprietary data has been deleted.
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<td>Nonapproved Accounting and Estimating Systems⁴</td>
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<tr>
<td>Kaiser Electronics</td>
<td>Yes</td>
<td>Yes⁵</td>
<td>No</td>
<td>Approved Accounting and Estimating Systems³</td>
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<tr>
<td>L &amp; P Machine, Incorporated</td>
<td>No²</td>
<td>No²</td>
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<td>Nonapproved Accounting and Estimating Systems⁴</td>
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</tbody>
</table>

See footnotes at end of appendix.

*Contractor confidential or proprietary data has been deleted.
<table>
<thead>
<tr>
<th>Contractor</th>
<th>Reduced Paperwork</th>
<th>Resulted in Financial Savings</th>
<th>Increased Contractor Participation</th>
<th>Provided Adequate Information to Contracting Officer</th>
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<tbody>
<tr>
<td>Litton, Applied Technologies Division</td>
<td>No⁵</td>
<td>No⁵</td>
<td>No Response</td>
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<tr>
<td>Lockheed Missile and Space Company, Incorporated</td>
<td>Yes</td>
<td>Yes⁵</td>
<td>No Response</td>
<td>Approved Accounting and Estimating Systems³</td>
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<tr>
<td>Loral, Vought Systems</td>
<td>No²</td>
<td>Yes⁵</td>
<td>No</td>
<td>Approved Accounting and Estimating Systems³</td>
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<tr>
<td>Loral, Western Development Laboratories</td>
<td>No²</td>
<td>Yes⁵</td>
<td>Yes</td>
<td>Approved Accounting and Estimating Systems³</td>
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<tr>
<td>Martin Marietta, Electronics, Information, and Missiles Group</td>
<td>Yes</td>
<td>Yes⁵</td>
<td>No</td>
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<td>McAffee Associates</td>
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<td>No²</td>
<td>No</td>
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<td>Mnemonics</td>
<td>Yes⁶</td>
<td>No²</td>
<td>No</td>
<td>Approved Accounting and Estimating Systems³</td>
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<tr>
<td>Molecular Devices Corporation</td>
<td>No²</td>
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<td>Olin Ordnance</td>
<td>No²</td>
<td>Yes⁵</td>
<td>No</td>
<td>Approved Accounting and Estimating Systems³</td>
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</table>

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<td>Photo Sonics</td>
<td>No²</td>
<td>Yes⁵</td>
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<td>Piezo Technology, Incorporated</td>
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<td>Reflectone</td>
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<td>Rockwell International, North American Aircraft</td>
<td>Yes</td>
<td>No²</td>
<td>No Response</td>
<td>Approved Accounting and Estimating Systems³</td>
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<td>SRI International</td>
<td>No²</td>
<td>No²</td>
<td>No</td>
<td>Approved Accounting and Estimating Systems³</td>
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<tr>
<td>ST Microwave Corporation</td>
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<td>Yes⁵</td>
<td>No</td>
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<td>Smith Industries Aerospace, Defense Systems</td>
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<td>Yes⁵</td>
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<td>Approved Accounting and Estimating Systems³</td>
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<tr>
<td>Standard Armament, Incorporated</td>
<td>No²</td>
<td>No²</td>
<td>No</td>
<td>Nonapproved Accounting and Estimating Systems⁴</td>
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</table>

See footnotes at end of appendix.

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</tr>
</thead>
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<tr>
<td>Standard Manufacturing Company, Incorporated</td>
<td>No²</td>
<td>No²</td>
<td>No</td>
<td>Approved Accounting and Estimating Systems³</td>
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<td>Stanford Telecom</td>
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<td>No²</td>
<td>No Response</td>
<td>Approved Accounting and Estimating Systems³</td>
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<td>Systems Control Technology, Incorporated</td>
<td>No²</td>
<td>Yes⁵</td>
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<td>Approved Accounting and Estimating Systems³</td>
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<tr>
<td>TRW, Incorporated, Space and Electronics Group</td>
<td>Yes</td>
<td>Yes⁵</td>
<td>No Response</td>
<td>Approved Accounting and Estimating Systems³</td>
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<tr>
<td>Teledyne GeoTech</td>
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<td>Trak Microwave Corporation</td>
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<tr>
<td>Transamerica Leasing, Incorporated</td>
<td>No</td>
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<td>No</td>
<td>Unable to Determine</td>
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<tr>
<td>Varian, Microwave Power Tube, Coupled Cavity Tube Products</td>
<td>Yes⁶</td>
<td>Yes⁵</td>
<td>No</td>
<td>*</td>
</tr>
</tbody>
</table>

See footnotes at end of appendix.

*Contractor confidential or proprietary data has been deleted.
When certified cost or pricing data are not required under the Act.

Contractors stated that, generally, contracting officers required the same amount of cost data for proposals priced under $500,000 as for proposals priced more than $500,000 that required certified cost or pricing data.

Contractor accounting and estimating systems currently approved by the Government.

Contractor accounting and estimating systems not subject to review due to contractor size.

Contractors stated that, generally, savings resulted from one of three things: less interaction (proposal audits) with the Defense Contract Audit Agency for proposals priced under $500,000, performance of price analyses (instead of cost analyses) of subcontractor proposals priced under $500,000, or reductions in time and personnel.

Contractors generally stated that summary cost (by cost element) data were only provided for proposals priced under $500,000.
Appendix C. Summary of Defense Contract Audit Agency Reviewed Proposals Priced Between $100,000 and $500,000

Number of Proposals

- FY 1989: 2,704
- FY 1990: 2,456
- FY 1991: 1,550
- FY 1992: 1,389
- FY 1993: 1,000

Threshold Changed December 1990
Appendix D. Organizations Visited or Contacted

Office of the Secretary of Defense
Under Secretary of Defense for Acquisition and Technology, Washington, DC
Deputy Under Secretary of Defense for Acquisition Reform, Washington, DC
Director, Defense Procurement, Washington, DC

Department of the Army
Assistant Secretary of the Army (Research, Development, and Acquisition), Washington, DC
Army Materiel Command, Alexandria, VA
Army Armament, Munitions, and Chemical Command, Rock Island, IL
Army Tank-Automotive Command, Warren, MI

Department of the Navy
Assistant Secretary of the Navy (Research, Development, and Acquisition), Washington, DC
Naval Air Systems Command, Arlington, VA
Navy Ships Parts Control Center, Mechanicsburg, PA

Department of the Air Force
Assistant Secretary of the Air Force (Acquisition), Washington, DC
San Antonio Air Logistics Center, Air Force Materiel Command, Kelly Air Force Base, TX
Warner Robins Air Logistics Center, Air Force Materiel Command, Robins Air Force Base, GA

Defense Organizations
Director, Defense Contract Audit Agency, Alexandria, VA
Dallas Branch Office, Central Region, Dallas, TX
Resident Office, E-Systems, Garland Division, Dallas, TX
Resident Office, Hughes Aircraft Company, Los Angeles, CA
Resident Office, Loral, Vought Systems, Dallas, TX
Resident Office, Rockwell International, North American Aircraft, El Segundo, CA
Resident Office, TRW, Incorporated, Redondo Beach, CA
Resident Office, Texas Instruments, Incorporated, Dallas, TX
Director, Defense Logistics Agency, Alexandria, VA
Appendix D. Organizations Visited or Contacted

Defense Electronics Supply Center, Dayton, OH
Defense Industrial Supply Center, Philadelphia, PA
Defense Contract Management District South, Atlanta, GA
  Defense Contract Management Area Operations, Dallas, TX
  Defense Contract Management Area Operations, Clearwater, FL
  Defense Contract Management Area Operations, Orlando, FL
Defense Plant Representative Office, Loral, Vought Systems, Dallas, TX
Defense Plant Representative Office, Texas Instruments, Incorporated, Dallas, TX
Defense Contract Management District West, El Segundo, CA
  Defense Contract Management Area Operations, El Segundo, CA
  Defense Contract Management Area Operations, San Francisco, CA
  Defense Contract Management Area Operations, Van Nuys, CA
  Defense Contract Management Office, Glendale, CA
Defense Plant Representative Office, FMC Corporation, San Jose, CA
Defense Plant Representative Office, Hughes Aircraft Company, Los Angeles, CA
Defense Plant Representative Office, Lockheed, Sunnyvale, CA
Defense Plant Representative Office, TRW, Redondo Beach, CA

Non-Defense Federal Organizations

General Accounting Office, Washington, DC

Non-Government Organizations

Advanced Research and Applications Corporation, Sunnyvale, CA
Aero Aire Corporation, Dunedin, FL
Aerospace Industry Association, Washington, DC
Aerosonic Corporation, Ordnance Division, Clearwater, FL
Air Logistics Corporation, Pasadena, CA
American Bar Association, Washington, DC
American Safety Flight Systems, Incorporated, Glendale, CA
Andrew SCICOMM, Government Products Group, Garland, TX
Carco Electronics, Menlo Park, CA
Celeritek, Incorporated, Santa Clara, CA
Composite Technology, Grand Prairie, TX
Continental Electronics, Dallas, TX
Contraves USA, Simulation and Systems Integration, Tampa, FL
Cypress Semiconductor Corporation, San Jose, CA
DBA Systems, Incorporated, Melbourne, FL
Dallas Chamber of Commerce, Dallas, TX
Daniels Manufacturing Company, Orlando, FL
Delfin Systems, Santa Clara, CA
ECC International Corporation, Orlando, FL
Engineering Technology, Orlando, FL
E-Systems, Garland Division, Garland, TX
FMC Corporation, Ground Systems Division, Santa Clara, CA
Goodman Ball, Incorporated, Menlo Park, CA
Grumman Aerospace and Electronics, Melbourne, FL
Harris Corporation, Government Aerospace Systems Division, Melbourne, FL
Hercules Defense Electronics Systems, Incorporated, Clearwater, FL
HiShear Technology Corporation, Torrance, CA
Hughes Aircraft Company, Radar Systems Group, Los Angeles, CA
Hydra Electric Company, Burbank, CA
Hytennas, Incorporated, Largo, FL
Kaiser Electronics, San Jose, CA
L & P Machine, Incorporated, Santa Clara, CA
Litton, Applied Technologies Division, San Jose, CA
Lockheed Missile and Space Company, Incorporated, Sunnyvale, CA
Loral, Vought Systems, Dallas, TX
Loral, Western Development Laboratories, San Jose, CA
Los Angeles Chamber of Commerce, Los Angeles, CA
Martin Marietta, Electronics, Information, and Missiles Group, Orlando, FL
McAfee Associates, Santa Clara, CA
Mnemonics, Melbourne, FL
Molecular Devices Corporation, Menlo Park, CA
National Association of Manufacturers, Washington, DC
Olin Ordnance, St. Petersburg, FL
Optical Data System, Incorporated, Richardson, TX
Photo Sonics, Burbank, CA
Piezo Technology, Incorporated, Orlando, FL
Reflectone, Tampa, FL
Rockwell International, North American Aircraft, El Segundo, CA
SRI International, Menlo Park, CA
ST Microwave Corporation, Sunnyvale, CA
Schwartz Electro-Optics, Incorporated, Orlando, FL
Smith Industries Aerospace, Defense Systems, Clearwater, FL
Standard Armament, Incorporated, Glendale, CA
Standard Manufacturing Company, Incorporated, Dallas, TX
Stanford Telecom, Sunnyvale, CA
Systems Control Technology, Incorporated, Palo Alto, CA
TRW, Incorporated, Space and Electronics Group, Redondo Beach, CA
Teledyne GeoTech, Garland, TX
Texas Instruments, Incorporated, Defense Systems and Electronics Group, Dallas, TX
Trak Microwave Corporation, Tampa, FL
Transamerica Leasing, Incorporated, San Francisco, CA
Varian, Microwave Power Tube, Coupled Cavity Tube Products, Palo Alto, CA
Appendix E. Report Distribution

Office of the Secretary of Defense

Under Secretary of Defense for Acquisition and Technology
Comptroller of the Department of Defense
Deputy Under Secretary of Defense (Acquisition Reform)
Deputy Under Secretary of Defense (Logistics)
Director, Defense Procurement
Assistant to the Secretary of Defense (Public Affairs)

Department of the Army

Secretary of the Army
Auditor General, Department of the Army

Department of the Navy

Secretary of the Navy
Assistant Secretary of the Navy (Financial Management)
Assistant Secretary of the Navy (Research, Development, and Acquisition)
Comptroller of the Navy
Commander, Naval Sea Systems Command
Auditor General, Department of the Navy

Department of the Air Force

Secretary of the Air Force
Assistant Secretary of the Air Force (Acquisition)
Assistant Secretary of the Air Force (Financial Management and Comptroller)
Auditor General, Department of the Air Force

Defense Organizations

Director, Defense Contract Audit Agency
Director, Defense Logistics Agency
Director, National Security Agency
Inspector General, Central Imagery Office
Inspector General, Defense Intelligence Agency
Inspector General, National Security Agency
Director, Defense Logistics Studies Information Exchange
Non-Defense Federal Organizations

Office of Management and Budget
Technical Information Center, National Security and International Affairs Division,
General Accounting Office

Chairman and Ranking Minority Member of Each of the Following Congressional
Committees and Subcommittees:

- Senate Committee on Appropriations
- Senate Subcommittee on Defense, Committee on Appropriations
- Senate Committee on Armed Services
- Senate Committee on Governmental Affairs
- House Committee on Appropriations
- House Subcommittee on Defense, Committee on Appropriations
- House Committee on Armed Services
- House Committee on Government Operations
- House Subcommittee on Legislation and National Security, Committee on
  Government Operations
Audit Team Members

Paul J. Granetto
Richard B. Jolliffe
Timothy J. Staehling
Arthur M. Hainer
Benjamin A. Mehlman
David P. Cole
Renee L. Gaskin
Susanne M. Williams
Michael Sciuto
Velma L. Booker
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A. Report Title: Truth in Negotiations Act Revised Dollar Threshold

B. DATE Report Downloaded From the Internet: 03/17/99

C. Report's Point of Contact: (Name, Organization, Address, Office Symbol, & Ph #): OAIG-AUD (ATTN: AFTS Audit Suggestions) Inspector General, Department of Defense 400 Army Navy Drive (Room 801) Arlington, VA 22202-2884

D. Currently Applicable Classification Level: Unclassified

E. Distribution Statement A: Approved for Public Release

F. The foregoing information was compiled and provided by: DTIC-OCA, Initials: ___VM___ Preparation Date 03/17/99

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