Cost and Software Data Reporting (CSDR) Compliance/Red Critical Trend Over Time Status

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Agenda

- DCARC's CSDR Compliance Processes and Rating Criteria
- Non-Compliance Trend
- Status Update
- Way Ahead

CSDR Compliance Process (Implementation effective Jan 2017)

- The Defense Cost and Resource Center (DCARC) completes the Compliance process **every month** and each program is rated **quarterly**
- DCARC's process:
  - Divides programs into three groups (A, B, C) and provides rating for each program in the current group based on compliance with CSDR policy (known as Compliance Assessments)

Group	Months Reviewed
A	February, May, August, November
B	March, June, September, December
C	January, April, July, October

  - Compliance Assessments begin on the 1st business day of the month prior to the compliance "As Of Date"
  - Notifies the CWIPT via email regarding any delinquencies and the current compliance rating
  - Coordinates with the program office or the reporting entities to resolve compliance issues
    - Resolved => removed and update the compliance assessment
    - Unresolved => goes into final compliance assessment
- The Cost Data Support Group (CDSG) submits the Compliance Assessments in DAVE IAW the DAES Compliance Assessment Calendar and DAES Group Assignments List (typically within first two weeks of the month).

Program Assignments in CADE determine CSDR Compliance Points of Contact

FOUO//Pre-Decisional

Compliance Rating Criteria

GREEN	No open CSDR compliance issues.
GREEN ADVISORY	Outstanding CSDR deliverable less than or equal to three months overdue.
YELLOW	Outstanding CSDR deliverable greater than three months, but less than or equal to six months overdue.
RED	1. Outstanding CSDR deliverable greater than six months overdue. **2. Formally rejected CSDR deliverable outstanding greater than 30 days overdue.**
RED-CRITICAL	1. Program Office released RFP without approved CSDR plan. 2. Program Office awarded prime contract without approved CSDR plan or failed to mod contract to place an approved CSDR plan on contract. 3. Program Office or Prime contractor failed to enforce flow down of CSDR requirements to direct reporting subcontractor or the prime contractor failed to mod subcontract to place an approved CSDR plan on contract. 4. Outstanding CSDR deliverable greater than 12 months overdue. **5. Three or more consecutive formal rejections for the same CSDR deliverable event will remain red-critical until the deliverable is accepted.**
NOT RATED	The program has no CSDR activity (e.g., approved waiver, cancelled, has no CSDR activity, or not currently tracked)

A program's CSDR Compliance Rating is overall (e.g. if one contract has a delinquent CSDR deliverable, then the program is delinquent)

CSDR Compliance History by Fiscal Quarter

Status Update & Way Ahead

- Status Update
  - CSDR Non-Compliance is getting increased attention from DoD Leadership
  - Looking deeper at F-35
  - **DCARC has identified the following common causes for non-compliance**

Issue	Resolution
Contract award or other milestone dates slip	**Program Office:** Contact the DCARC, who will determine if a Date Change Request or CSDR plan administrative change is the best path forward
Period of Performance is extended	**Program Office:** Complete Date Change Request for Final submissions. If extension is > 1 year, additional "Interim" submission events may need to be added. **Industry:** If attempting to submit to a "Final" submission that has not yet been updated in CADE, contact the DCARC and the Program Office
Contract is cancelled	**Program Office:** Contact the DCARC to initiate a CSDR plan cancellation
Initial SRDR assumption no longer valid	**Program Office and Industry:** At CSDR-RR, inform the DCARC if your software effort does not meet the reporting threshold in the DoDI 5000.73; requirement can be removed via plan revision with CWIPT concurrence
Initial subcontractor assumption no longer valid	**Program Office and Industry:** If a CSDR plan was created for a subcontractor that is no longer expected to breach the reporting threshold, the CWIPT can determine if the subcontractor CSDR plan should be cancelled
Contract was awarded with no submitter	**Industry:** If you are unable to locate a submission event in CADE, reach out to a DCARC analyst (if known) or contact the CADE Service Desk. The CADE Service Desk can either assist or refer you to your DCARC analyst.

Status Update & Way Ahead

- Way Ahead [We need your help!]
  - Resolving increasing compliance issues requires collaboration between industry and CWIPTs (Program Offices, DCARC, Service Cost Centers, and OSD CAPE)
  - Roles & Responsibilities:

    Program Office [Cost Analyst, Contracting Officers, Program Managers] – Reviews your CSDR plans and delinquencies to determine if any delinquencies can be resolved via one of the pathways identified on Slide 6. Additionally, coordinates with the DCARC and industry to determine next steps for submitting reports that are overdue. **Getting a CADE account will make tracking CSDR delinquencies much easier.**

    DCARC – Offers subject matter expertise on CSDR requirements, attends and/or facilitates discussions between industry and the CWIPT to discuss status and way forward for individual contracts and programs, and performs administrative actions within the CADE system to support agreed-upon paths forward.

    Service Cost Centers and OSD CAPE – Support "path forward" discussions, offer subject matter expertise, and provide recommendations as end users of the data

    Industry – Review your CSDR deliverables and delinquencies to determine the barriers (if any) to submitting overdue reports and discuss these barriers with the Program Office and the DCARC.

Everyone has a part! We must come together to resolve compliance issues.

Discussion & Questions

Industry and Program Office perspectives on CSDR compliance?