Written by Nick Sanders Thursday, 19 April 2018 00:00

The 2018 National Defense Authorization Act (NDAA) <u>changed</u> the threshold at which certified cost or pricing data was required to be obtained. We told you about it.

## **Several times**

. We ranted about it.

## Several times

. The statute was revised such that the threshold was increased from \$750,000 to \$2 million.

On April 13, 2018, the DoD issued a <u>Class Deviation</u> that aligns the FAR with the revisions to the underlying statute. The Class Deviation also acknowledges that the CAS coverage threshold is now \$2 million as well.

All this is good news.

As we have urged (several times), you should revise your policies and procedures to require certified cost or pricing data only from subcontractors whose proposals are in excess of the new threshold. You should administer CAS only on subcontracts whose value is in excess of the new threshold.

The changes go into effect for DoD on July 1, 2018, according to the Class Deviation.