

FTA Conducting Buy America Pre-Award and Post-Delivery Audits "FRONT LINE REPORT"

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Key Presentation Take-Aways

- Buy America Reference Manual
- Balancing Audit Scope and Resources
- Timeline Management
- A Summary is a “Checklist”
- The First Rolling Stock Vehicle Delivered
- Reporting Templates, Excel Tools and Major Component Analysis

Buy America (BA) Reference Manual

- 2017 Conducting Buy America Pre-Award and Post-Delivery Audits, effective 3/21/17
- 49 CFR 661 – Buy America Requirements
- 49 CFR 663 – Audit Requirements
- FTA Guidance – FR 9/1/16 Implementing the phased increase in domestic content %
- FTA FR 1/17/17 - Audit Handbook Released
- Presidential E.O. 4/18/17 Buy American ...

Balancing Audit Scope and Resources

- Procurement size and characteristics
- Transit Agency and TVM internal resources
- Contract approval timeline (Pre-Award)
- TVM on-site or off-site audit schedules
- Follow-up audit documentation
- Service implementation and Post-Delivery audit report deadlines

Timeline Management

- Audit Notice-To-Proceed with Grantee documentation submitted/report deadline
- TVM on-site audit schedule date includes audit documentation preparation time
- Confidential documentation identified
- On-site Tours: Production line, component/subcomponent manufacturing, new items

A Summary is a “Checklist

- Appendix A - Sample Checklists
 - Recipient
 - Compliance with Buy America, Triennial and other FTA Reviews
 - Rolling Stock Manufacturer
 - Buy America regulatory and technical compliance
 - Auditor
 - Accountability (Completeness)
 - Internal audit file documentation

Recipient A.2.3 Checklist with Documentation Reference Added

BUY AMERICA PRE-AWARD AUDIT CHECKLIST

A.2.3 PRE-AWARD AUDIT PURCHASER'S REQUIREMENTS CERTIFICATION FOR RECIPIENTS

Activity	Supporting Document	Reference	Verified
Part 1			
Comparison of rolling stock manufacturer's specification with purchaser's solicitation specification	<ul style="list-style-type: none"> Recipient's checklist for comparison of manufacturer's specification with solicitation specification; See Checklist A.2.4, pg 61. 	Recipient to complete Before Pre-Award Audit	<input type="checkbox"/>
	<ul style="list-style-type: none"> Manufacturer's supporting documents such as its proposal, manufacturer and supplier specifications, product brochures, technical data sheets, drawings, and bills of material. 	Record section of manufacturer bid where this information was included	<input type="checkbox"/>
Part 2			
Assessment of manufacturer's capability	<ul style="list-style-type: none"> Recipient's checklist for manufacturer's capability assessment; 	Record document title, date completed and filed	<input type="checkbox"/>
	<ul style="list-style-type: none"> Manufacturer's supporting documents such as descriptions of facilities and equipment, plant output capacity, facility layout drawing/flow diagram, production line layout/flow diagram, staffing counts by craft, QA/QC Plan, mobilization plan, list of concurrent work, list of past performance on similar projects, financial records, and other documents; 	Record section of manufacturer bid where this information was included	<input type="checkbox"/>
	<ul style="list-style-type: none"> Major supplier/subcontractor supporting documents same as described in previous bullet above; 	Record section of manufacturer bid where this information was included	<input type="checkbox"/>
	<ul style="list-style-type: none"> Manufacturer's project level plans such as QA/QC plan, schedule, supplier management plan, and document/configuration control plan. 	Record section of manufacturer bid where this information was included	<input type="checkbox"/>
Reviewed and accepted by:			
Name			
Signature			Date
Title			

The First Rolling Stock Vehicle Delivered

- “Scheduled Delivery Date” determines applicable domestic content percentage
- Bill of Materials generated for the Post-Delivery Audit
- Post-Delivery Buy America Audit Report
- Domestic Content Monitoring Period

Common Ground Audit Reporting Templates

- Confidentiality – Audit Reports
- Domestic Content Worksheet
- Supplier Buy America Certifications
 - manufacturer provided
 - Component/subcomponent suppliers
 - 2017 audit handbook (sample)
- Manufacturer Self-Certifications

Common Ground Audit Tools

- Diverse Accounting Systems can generate an Excel Bill of Materials schedule
- Generate Domestic Content Worksheets using Pivot Tables
- Assign Appendix B&C to 661.11 Component Descriptions by Excel table functions
- FTA 2017 Audit Handbook Checklists, Certifications and Forms

Common Ground Major Component Analysis

- Internally-manufactured
- New technology, system & assemblies
- Waivers - General and FTA decision letters
- Manufactured Product (comp manf in US) vs Rolling Stock Component (comp manf in US and >60% of subcomponents manf in US)
- Appx B&C to 661.11 lists Components not subcomponents for Rolling Stock Vehicles
- Manufacturing “substantial transformation”

BUY AMERICA AUDITOR MOTTO

We Go Beyond the Weeds



Buy America
Auditors

Where Detail is Biodegradable

Conducting Buy America Pre-Award and Post-Delivery Audits

Questions?

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