



STANFORD UNIVERSITY
SLAC National Accelerator Laboratory
 Operated by Stanford University for the U.S. Department of Energy



DOE Order 520.1B Chg. 1 (LtdChg) – Financial Management and Chief Financial Officer Responsibilities (11/11/2022)
Site Compliance Plan (05/08/2023)

Contents

Contents..... 1
 Introduction 1
 Attachment 1 – Contractor Requirements Document..... 2
 Approvals 6
 Revision History..... 6

Introduction

This Site Compliance Plan (SCP):

- a) corresponds with the version of the DOE Order on Financial Management and Chief Financial Officer Responsibilities listed in the Prime Contract,
- b) states how the Laboratory complies with applicable requirements as tailored to the risks at the Laboratory, and
- c) documents DOE-approved methods of compliance for applicable requirements and recurring deliverables*.

Impact on the Contract:

Under the SCP, sections of the CRD are incorporated into the Contract as-is, unless the SCP indicates that a section or portion thereof is inapplicable, or the section has been changed. Thus, for example, if “in compliance” is listed next to a CRD section, that section is incorporated into the Contract as-is. However, where an SCP indicates that a section or portion thereof is inapplicable, the section or portion thereof is excluded from the Contract. In addition, where a section or portion thereof is applicable, but changes to the section have been agreed by the Parties, the section, as modified by the Parties, shall be incorporated into the Contract.

The SCP also clarifies SLAC’s interpretation of the requirements, memorializes the Parties’ agreement on how SLAC will comply with sections of the CRD (whether or not modified) and identifies the multiple Laboratory programs and processes established to fulfill the respective requirements.

**Deliverables: Data delivered to DOE or other external agency (e.g., recurring reporting, external database entries)*



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Attachment 1 – Contractor Requirements Document

§	Requirements from Attachment 1 – CRD	Compliance Status	Method of Compliance	Deliverables* (managed through SLACTrak)			
				Item	Frequency	Due Date(s)	Recipient (e.g., SSO)
1	Integrated Controls	Not a requirement	n/a	n/a	n/a	n/a	n/a
1.a.	As an integrated contractor of the Department of Energy (DOE), a separate set of accounts and records for recording and reporting all business transactions under the contract must be maintained. An Integrated Contractor’s books of account must be integrated with those of the Department through the use of reciprocal accounts, consistent with contract requirements, including the clause at 48 CFR 970.5232-8. An Integrated Contractor’s system of accounts must conform with generally accepted accounting principles for the Federal Government and produce accurate results. The system of accounts must not conflict with DOE O 520.1B or the DOE Financial Management Handbook (versions in effect as of the date of contract award or contract modification).	In Compliance	SLAC’s accounting system is standalone from Stanford University. SLAC submits a monthly STARS file that maps to the DOE accounts.	n/a	n/a	n/a	n/a
1.b.	Integrated contractors must follow the applicable provisions of the DOE Financial Management Handbook. Integrated contractors must comply with subsequent revisions to the DOE	In Compliance	SLAC updates its Disclosure Statement and accounting system to reflect revisions to the DOE Financial Management Handbook.	n/a	n/a	n/a	n/a

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	Financial Management Handbook when notified under the “Laws, regulations, and DOE directives” clause of the contract.						
1.c.	Integrated contractors must provide the cognizant Designated Financial Officer access to contractor financial systems when required by the Designated Financial Officer.	In Compliance	SLAC maintains all pertinent records and data for DOE access.	n/a	n/a	n/a	n/a
1.d	Integrated contractors must obtain the approval of the cognizant Designated Financial Officer for financial systems that integrate with the Department’s accounting system, consistent with contract requirements.	In Compliance	SLAC complies with DEAR 970.5232-7 – Financial Management System. SLAC CIO submits to DOE for written approval an annual plan for new financial management systems and/or subsystems and major enhancements and/or upgrades to the currently existing financial systems and/or subsystems.	Business System Plan Update	Annual	9/30	DOE SSO
1.e	Integrated contractors shall actively manage indirect cost rates by adjusting rates as needed during the course of the year to minimize end-of-year variances. Final indirect cost rates will be determined in accordance with contract and regulatory requirements.	In Compliance	The Budget Office monitors indirect cost rates throughout the fiscal year. A mid-year review is conducted and rate changes are implemented as needed.	n/a	n/a	n/a	n/a
2	Nonintegrated Contractors. Nonintegrated Contractors must provide financial information to DOE as required to support DOE accounting and financial reporting, including, as applicable, information on	n/a	n/a: SLAC is an integrated contractor	n/a	n/a	n/a	n/a

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	pensions and benefits, environmental liabilities, and DOE-owned assets. Information provided will be compliant with applicable financial reporting and accounting requirements specified by the cognizant Designated Financial Officer.						
3	Internal Control and Enterprise Risk Management. When identified by Office of the Chief Financial Officer as a DOE internal controls assessable unit, the contractor must assist DOE in meeting obligations imposed on DOE by Office of Management and Budget (OMB) Circular No. A-123 (version in effect as of the date of contract award or contract modification), including: Management’s Responsibility for Enterprise Risk Management and Internal Control, Management’s Responsibility for Internal Control, and Appendices. Contractor activity is to be performed in accordance with annual guidance provided by the Department’s Chief Financial Officer.	In Compliance	SLAC annually performs the necessary operations to fulfill its obligations as required by the OMB Circular No A-123 in accordance with annual guidance provided by the Department’s Chief Financial Officer.	FMA Module submission in AMERICA	Annual	Varies based on DOE schedule	DOE SSO

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4	Payment Integrity. When identified by the Office of Chief Financial Officer as a DOE payment integrity reporting site, the contractor must assist DOE in meeting payment integrity obligations imposed by OMB Circular No. A-123, Appendix C, Requirements for Payment Integrity Improvement, and other relevant policies and statutes. Contractor activity is to be performed in accordance with annual guidance provided by the Department's Chief Financial Officer.	In Compliance	SLAC provides annual payment integrity reporting to DOE as required by OMB Circular No. A-123, Appendix C and other requirements for payment integrity in accordance with annual guidance provided by the Department's Chief Financial Officer.	Certification Letter	Annual	7/31	SSO

(end CRD)

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Approvals (Electronically sign and date)

Name	Title	Signature
George Clark	Chief Financial Officer, SLAC	<u>George Clark</u> George Clark (May 9, 2023 08:20 PDT)
Ernest Maune	Team Lean, Business Systems, SSO	
Katherine Woo	Contracting Officer, SSO	
Hanley Lee	Head of Field Element, SSO	

Please return signed document to Burnnett@SLAC.Stanford.edu

Revision History

Revision	Revision Date	Summary of Change(s)
R0	5/08/2023	Original release.