Government Contract Compliance Checklist: A CLM Checklist for Federal Contractors

A practical checklist for government contractors to track compliance obligations across the contract lifecycle – from pre-award through closeout. Use this to audit your own contract management process or as a companion to a CLM implementation.

Pre-Award Readiness

- ☐ CAGE/UEI code active and current
- ☐ Reps & Certs (SAM.gov) up to date
- ☐ Small business subcontracting plan on file (if applicable, size-dependent)
- ☐ Applicable set-aside status confirmed (e.g., SDVOSB, WOSB, HUBZone, 8(a))
- ☐ Export control screening completed (ITAR/EAR), if contract involves technical data or defense articles

Contract Intake & Setup

- ☐ Contract type identified (FFP, T&M, Cost-Reimbursement, IDIQ, BPA, OTA, etc.) and required compliance workflows assigned
- ☐ CLINs/SLINs mapped and funded correctly
- ☐ ACRNs assigned and reconciled to funding lines
- ☐ PWS/SOW reviewed for CDRL requirements and delivery schedule
- ☐ Period of Performance and option periods logged
- ☐ Clauses logged and flow-down clauses identified and pushed to subcontracts
- ☐ Deliverables, reports, and recurring compliance deadlines automatically scheduled
- ☐ Key personnel commitments logged, with substitution/approval process documented
- ☐ Government Furnished Property (GFP/GFE) receipt and accountability process established, if applicable

Contract Administration & Regulatory Compliance

- ☐ FAR/DFARS clause compliance tracked throughout contract performance (not just at award)
- ☐ Limitation of Funds clause monitored (spend vs. funded ceiling)
- ☐ Wage determinations (Service Contract Labor Standards/Davis-Bacon) applied and kept current
- ☐ Consent-to-subcontract and notification requirements identified and monitored where applicable
- ☐ Accounting, timekeeping, and labor charging practices aligned with applicable DCAA guidance and FAR cost principles
- ☐ Invoicing compliance tracked (WAWF/iRAPT or IPP submissions reconciled against CLINs, ACRNs, and funding)

☐ Organizational conflict of interest (OCI) assessments completed before award and reassessed following material organizational changes
☐ OCI mitigation plans implemented and maintained where required
☐ Government correspondence, cure notices, show cause notices, and contractual direction retained in the official contract record

Cybersecurity & Information Protection

☐ CMMC and/or NIST SP 800-171 requirements identified and mapped to organizational compliance status
☐ Cloud hosting and information systems validated against applicable FedRAMP, DoD, agency, and CUI handling requirements
☐ Cyber incident detection, response, and reporting procedures established (including DFARS 252.204-7012 72-hour reporting requirements where applicable)
☐ AI-assisted contract performance and content generation comply with applicable contract clauses, agency guidance, security requirements, and data handling restrictions.

Industrial & Personnel Security

☐ Facility Clearance Level (FCL) confirmed and current for all performing locations
☐ DD Form 254 received, reviewed, and reconciled against contract security requirements
☐ Personnel clearances (PCLs) verified and synced with DISS; SCI/SAP access documented where required
☐ Insider threat program elements documented per 32 CFR Part 117 (indicators tracked across HR/Security/IT/Legal)
☐ Classified material, container, and area accountability logs current (safes, SCIFs, SAPFs, combination changes)
☐ Foreign travel/foreign contact reporting current for cleared personnel
☐ Self-inspection completed and documented (annual NISPOM requirement)
☐ SEAD 3 reporting obligations current for cleared employees

Performance & Reporting

☐ CPARS submissions tracked and scheduled
☐ Deliverables accepted by Government and acceptance documentation retained
☐ Contract performance metrics and required status reports submitted on schedule
☐ EVM data (SPI/CPI) reconciled monthly if required

Change & Modification Management

☐ All mods logged against original CLIN/SLIN structure
☐ SF-30 documentation filed per modification

- ☐ TINA sweep completed and Certificate of Current Cost or Pricing Data updated prior to price agreement on mods/definitizations requiring certified data
- ☐ Option exercise, extension, and recompete milestones tracked with advance notifications

Closeout Readiness

- ☐ Subcontractor closeout completed
- ☐ Open modifications, claims, REAs, and equitable adjustments resolved before closeout
- ☐ DCAA/DCMA audit trail complete
- ☐ CPSR documentation current (if applicable)
- ☐ Final CDRL deliverables confirmed received/accepted
- ☐ Records retention schedule confirmed (per FAR Subpart 4.7 requirements)
- ☐ Novation or name-change agreements filed, if a corporate change occurred during performance
- ☐ Government property disposition completed and documented
- ☐ Final indirect rates settled (for cost-reimbursement contracts)
- ☐ Contract closeout checklist signed off (final invoice, property disposition, patent/royalty report)