



Consultant Services Self-Assessment Checklist

As a part of the National Science Foundation's (NSF) continued efforts to better facilitate award stewardship, this checklist was created to enable applicants and awardees to assess their consultant services practices, verify areas where those practices meet federal requirements, and identify and remedy any deficiencies identified. Specifically, this checklist was designed to enable awardees to verify that:

- A consultant services **policy** that states compliant requirements has been approved by management and distributed to staff for official use
- Consultant services costs are **supported** by pre-award checks, cost-price analysis, and an enforceable agreement
- Consultant services are **managed** in a way that ensures that agreed upon services are provided prior to payment and that actual payments are in line with the written agreement
- Consultant agreements are regularly **reviewed** and timely **closed**.

What are Consultant Services?

Consultant services, also referred to as professional services, are services rendered by persons who are members of a particular profession or possess a special skill, and who are not officers or employees of the proposing organization. Costs of professional and consultant services are allowable when reasonable in relation to the services rendered and when not contingent upon recovery of costs from the Federal government.

For additional guidance, please refer to the Uniform Guidance [Section 459, "Professional Services Costs"](#) and [Sections 317-327 "Procurement Standards"](#); FAR Part 31 [205-33, "Professional and Consultant Service Costs"](#) and [Subpart 2, Contracts with Commercial Organizations](#); [GC-1, Section 5, "Consultant Services"](#); [CA-FATC, Section 5, "Consultant Services"](#); and [2 CFR 180 OMB Guidelines to Agencies on Governmentwide Debarment and Suspension \(Non-procurement\)](#).

Organizational Consultant Services Policies, Procedures, and Practices

1. In your organization, is contracting with a consultant a procurement action?

2. Does your organization, prior to making the decision to issue a consultant agreement, assess whether a subaward might be more appropriate?

3. Does your organization have written policies and procedures for consultant identification, evaluation, contract preparation/administration, oversight, payment, and contract closeout?

- 4. Does your organization have established procedures to ensure that consultants are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency?**

- 5. Does your organization have a standard template for retaining consultant services to ensure a consistent process and adequate supporting documentation?**

- 6. Does your organization have established procedures to conduct cost/price analysis to determine a reasonable rate to pay the consultant and document the outcome of that analysis?**

- 7. Has your organization established procedures for verifying that services and deliverables have been provided prior to paying a consultant invoice?**

- 8. Does your organization have established practices to regularly review open consultant contracts and close completed contracts?**

- 9. Can consultant fees be paid for speaking at conferences?**

10. Which of the following are common concerns related to consultant services? (We recommend that your organization review all answers)

Consultant services policies and procedures are not documented

✔ **CORRECT.** This is the most common concern. Awardees often have good practices, but either have not, or have not fully documented related policies and procedures. Written guidance is essential to demonstrate good practices and ensure consistent implementation. ■

Organization does not verify and document that services are received prior to payment

✘ **INCORRECT.** This issue is an infrequent but common observation. See Question 7. ■

Consultant agreement not documented or the agreement does not contain required elements

✘ **INCORRECT.** This is a common concern. See Question 5. ■

Cost/price analysis is not performed and/or documented prior to issuing each consultant services agreement

✘ **INCORRECT.** This is a common concern. See Question 6. ■

Consultant either did not perform contracted services or did not perform them at the level agreed upon

✘ **INCORRECT.** In our experience, NSF partners are quite careful when selecting consultants. Of course, there may be instances where consultants do not perform as expected and those costs can be questioned, but it is not common. ■

Special note: Although uncommon, some organizations engage consultants associated with or at an international branch campus of a US Institute of Higher Education (IHE) or a foreign organization, through an intra-university agreement. Please be aware that there are additional requirements for these types of arrangements. Please consult the PAPPG Chapter I.E.6 and a special term and condition, research term and condition #43. Finally Public Law 115-232 Section 889 “John S. McCain National Defense Authorization Act for Fiscal Year 2019.”