

CLIENT ALERT

FAR Council Finalizes Reporting Requirements for Executive Compensation and First-Tier Subcontract Awards

July 26, 2012

On July 26, 2012, the [FAR Council](#) issued a [final rule](#) requiring certain contractors to report executive compensation, first-tier subcontract awards, and executive compensation information for first-tier subcontractors for public release on the [USASpending](#) website. While the final rule is very similar to the interim rule issued on July 8, 2010, there is a substantive change to the definition of first-tier subcontract, and the preamble to the final rule contains extensive commentary to guide the implementation of the rule, including discussion of the application of the public company exemption. For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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