

Master Document – Audit Program

Activity Code 13020		Compensation System Internal Controls
Version 7.7, dated September 2012		
B-1	Planning Considerations	
Purpose and Scope		
The major objectives of this audit are to:		
<ul style="list-style-type: none"> • Evaluate the adequacy of and the contractor’s compliance with the compensation system internal controls. 		
<ul style="list-style-type: none"> • Obtain a sufficient understanding of the contractor’s compensation system and related internal control (including both manual and computerized activities) to plan related audit effort. This requires that the auditor assess the adequacy of the contractor’s policies and procedures, whether they have been implemented, and if they are working and being monitored effectively. 		
<ul style="list-style-type: none"> • Document the understanding of the compensation system internal controls in working papers and permanent files. 		
<ul style="list-style-type: none"> • Assess control risk as a basis to identify factors relevant to the design of substantive tests. 		
<ul style="list-style-type: none"> • Report on the understanding of the compensation system internal controls and assessment of control risk, and the adequacy of the system for Government contracts. 		
<p>This audit is limited to the examination of the compensation system and related internal controls for major contractors, non-major contractors where the system is considered significant, and other contractors with substantial firm-fixed price contracts. Only those controls directly related to the contractor’s compensation system, as defined below, will be audited under this assignment. Controls for interrelated audit concerns regarding the adequacy of the contractor’s other major systems (i.e., labor, estimating, etc.) will be audited under separate assignments. While the controls for these areas are not part of this audit, the results of all audits of these interrelated controls must be considered in forming an overall audit conclusion on the compensation system internal controls. The results of this audit should be commented on in reports on related audit areas.</p>		
<p>When performing an update or follow-up examination, the steps below should be adjusted and tailored accordingly. To the extent possible, prior audit effort should be used as a basis for validating the contractor’s internal controls.</p>		
<p>Before beginning this examination, the auditor should be alert for internal control evaluations performed by the contractor or its external auditors relating to this audit area. In those cases where internal or external evaluations have been performed, the auditor</p>		

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<p>should follow guidance contained in CAM 4-1000, Relying Upon the Work of Others.</p>
<p>Before performing any examination of internal controls, the auditor should determine that the system contemplated for examination is material to the Government. Once it is determined that the system is material to the Government, the auditor should reassess the materiality of each section in the internal control audit before performing any audit steps in that section. The scope of any audit depends on individual circumstances. The auditor is expected to exercise professional judgment, considering vulnerability and materiality, in deciding the scope of audit to be performed.</p>
<p>The use of computers of all kinds in a contractor’s accounting and management system is so pervasive it is unlikely that any audit of them could be performed adequately without an examination of the internal controls over their automated aspects. Therefore, the auditor should become familiar with guidance contained in the Information System (IS) Auditing Knowledge Base that is found on DCAA’s Intranet, prior to the beginning of this audit. In addition, in some instances, the assistance of IT specialists may be required to adequately evaluate the automated aspects of the internal controls. In these cases, auditors should contact, through their supervisory auditor, their regional office to obtain the necessary expertise.</p>
<p>The internal control matrix (see Internal Control Matrix – Compensation System Audit), shows the interrelationships among the control objectives, example control activities, and audit procedures used in this audit program. The control objectives and the audit procedures have been fully integrated into this audit; therefore, the matrix is not needed unless it is desirable to see the associated example control activities and the interrelationships in a matrix format.</p>
<p>In cases where this examination covers internal control systems at multi-segment contractors, follow the guidance in CAM 5-103.2 and 5-110e. Auditing internal controls at multi-segment contractors requires effective coordination among cognizant auditors to identify the audit responsibilities at each location to ensure appropriate audit coverage when contractor locations share components of an internal control system, such as policies and procedures, common technologies (e.g., software) or common management. FAOs cognizant of segment locations should initiate assist audits from off-site locations as necessary. FAOs cognizant of off-site locations should not self-initiate audits of internal controls.</p>
<p><u>References</u></p>
<ul style="list-style-type: none">• CAM 3-300, Internal Control Audit Planning Summary (ICAPS)
<ul style="list-style-type: none">• CAM 5-100, Obtaining an Understanding of a Contractor’s Internal Controls and Assessing Control Risk
<ul style="list-style-type: none">• CAM 5-800, Compensation System Reviews (CSR) and Audit of Internal Control
<ul style="list-style-type: none">• CAM 6-413, Reasonableness of Compensation Costs
<ul style="list-style-type: none">• CAM 6-414, Reasonableness of Compensation Costs of Owners, Executives, and

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Other Employees Having a Higher Risk of Unreasonable Compensation

B-1	Preliminary Steps	W/P Reference
	Version 7.7, dated September 2012	
	1. Research and Planning	
	a. Review open MRD’s for guidance which may impact the audit and adjust the scope and procedures appropriately. Open MRDs can be identified using the link provided on the DCAA Intranet home page for “MRDs, AGMs, & AMGMs”	
	b. Become familiar with applicable sections of CAM (5-800, 6-413, 6-414).	
	c. Perform the following steps using the permanent file:	
	(1) Review the prior compensation system audit working paper package.	
	(2) Using the framework and the guidelines in WP B-2, obtain and document an understanding of the contractor's internal controls that are relevant to the audit. With the proper planning auditors should be able to obtain and document a major portion of this understanding during a walk-through of the contractor's assertion.	
	(3) Identify the sources for the detailed policies, procedures, charts, etc., called for in steps (a) through (d) below. Document the sources of data by listing the data, its sources, and any changes since the last system audit.	
	(a) Contractor’s written compensation policies and procedures.	
	(b) Organization charts depicting the functional areas responsible for the developing and processing of compensation related data.	
	(c) Compensation system flowcharts providing a pictorial overview of all manual and computerized processing steps.	
	(d) Information systems documentation:	
	(i) Pertinent record layouts of files created and/or used during the processing of compensation related transactions.	
	(ii) Database table definitions.	

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(iii) Source documents.	
(iv) Information on the conversion of documents to computer media.	
(v) Subsidiary or master files affected by the system.	
(vi) Relevant reports, journals, and ledgers produced in the flow of information to the compensation reports.	
(4) Review audit lead sheets.	
(5) Review other related audits (e.g., 10100-Incurred Cost and 21000-Price Proposal).	
<p>d. Hold a planning meeting with the audit team (e.g., RAM, Manager, Supervisor, Auditors) to discuss the risk of fraud and other noncompliances with applicable laws and regulations that could have a material effect on the assertion. The discussion should include relevant prior audit experience (e.g., questioned cost, relevant reported estimating or accounting system deficiencies), relevant aspects of the contractor’s environment (e.g., the extent of incentives, pressures and opportunities to commit fraud and the propensity to rationalize misstatements), other known risk factors, and the audit team’s understanding of relevant internal controls (see W/P B-2). The team should also review and discuss the general and other relevant sections of the IG Handbook on Fraud Indicators for Contractors as well as characteristics and types of activity associated with illegal expenditures and acts for specific audit areas in CAM Figure 4-7-5. See “Principal Sources of Fraud Indicators” below.</p> <p>Based on the team discussion and other risk assessment procedures the team should document on W/P B, Section 4 the risk factors/indicators identified and design audit procedures to meet the audit objectives and provide reasonable assurance of detecting fraud and other noncompliances with applicable laws and regulations that could have a material effect on the proposal (i.e., tailor (add/delete/modify) the audit steps). GAGAS 6.13(a)</p> <p>Communication among audit team members about the risk of material misstatement due to fraud should continue as needed throughout the audit.</p> <p>Principle Sources of Fraud Indicators:</p> <ul style="list-style-type: none"> • Handbook on Fraud Indicators for Contract Auditors, Sections I and III, (IGDH 7600.3, APO March 31, 1993) located at: http://www.dodig.mil/PUBS/igdh7600.doc. • CAM Figure 4-7-5. 	

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<p>(To access the fraud handbook, copy and paste the web address shown above into the address block in Internet Explorer.)</p>	
<p>e. Obtain from the contractor a schedule of total dollars processed through the compensation system for the past twelve months (or most recent completed fiscal year) and summarize by total dollars and dollars by Government flexibly priced contracts and fixed price contracts in order to determine the materiality of the compensation system. Complete the Materiality section of the ICAPS form at W/P A (MAAR #1).</p>	
<p>f. Contact the contracting officer to ascertain any known concerns (including risk related to the contractor’s financial condition) that will impact the audit and adjust the audit scope and procedures accordingly. If information regarding the contractor’s financial condition is not available from the contracting officer, the auditor should perform the procedures addressed in CAM 2-302.1h. If during the course of the audit the auditor becomes aware of unfavorable or adverse financial conditions, they should immediately communicate their concerns to the contracting officer, and appropriately adjust the scope of audit.</p>	
<p>g. Electronically transmit an acknowledgement/notification to the ACO/Buying Command notifying them of the commencement of the risk assessment and that the expected completion date will be provided in the formal acknowledgement/notification once the risk assessment is complete. (CAM 2-303). The acknowledgement/notification process should be within the timeframe and in accordance with the procedures in CAM 4-104.</p>	
<p>h. FAOs that have cognizance of contractors with significant classified contracts should coordinate with the Field Detachment to determine the DCAA office responsible for identifying and reviewing compensation on classified contracts. This coordination should be documented in the working papers. FAOs should also coordinate with the Field Detachment on any significant compensation system issues found on classified contracts during prior period reviews.</p>	
<p>i. Close coordination is required at FAOs cognizant of a shared services location and the FAOs cognizant of the segments serviced by the shared services. Document the objectives and procedures to be performed at the shared services location and the segment level. Request assist audits as applicable.</p>	
<p>j. Determine the extent and results of the contractor’s self-governance activities, internal and external audits, and coordinated audits related to the compensation system.</p>	
<p>(1) Request the contractor to provide a list of completed internal and external audits and determine if any are related to the</p>	

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compensation system.	
(2) If applicable, coordinate with the CAC or corporate office auditors to determine if any internal control weaknesses that might impact the compensation system were identified in management’s internal control report or independent auditor’s attestation on management’s assertion included in the annual report filed with the SEC.	
(3) In those cases where internal or external audits have been performed, the auditor should follow the guidance contained in CAM 4-1000, Relying Upon the Work of Others. Document your preliminary evaluation and its impact on the scope of this examination. The evaluation of internal audit working papers is documented in detail under Management Reviews in Section G-1, step 3.	
k. Determine the need for technical specialist assistance, if any, and document your consideration on working paper B-3.	
2. Entrance Conference and Preparation	
a. Prepare a written memorandum to the contractor to arrange for an entrance conference, covering the areas highlighted in CAM 4-302 and any specific data or pertinent information not yet provided.	
b. Conduct an entrance conference as outlined in CAM 4-302, with particular emphasis on:	
(1) Requesting the contractor to provide, if applicable, a system orientation briefing or a demonstration of the compensation system transaction flow including data input, data processing, data output, and related internal controls. Document under Information and Communications, Section E-1, Step 3.	
(2) Determining any changes in the compensation processing job stream since the last examination.	
(3) Discussing the contractor’s risk assessment process. Overall understanding of the contractor’s processes will be documented under Contractor Risk Assessment, Section D-1.	
(4) Discussing the contractor’s monitoring process to ensure that established manual and computerized controls are functioning as intended. Document under Monitoring, Section F-1.	
(5) Discussing any identified weaknesses which may have been previously reported and related follow-up actions taken.	
c. Issue a notification letter to the contractor regarding the audit in	

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accordance with CAM 4-302.3.	
3. Other Preliminary Steps	
a. Determine the degree a computerized system is used in the compensation process.	
b. Perform a high level cursory evaluation to determine if the following exist:	
(1) A functional compensation organization with defined organizational responsibilities.	
(2) A written description of the work flow in the compensation process.	
(3) Policies and procedures for effectively controlling the process.	
4. Initial Risk Assessment	
Using the information in steps 1, 2, and 3, prepare an initial risk assessment to determine the initial scope of the examination (W/P B).	

C-1	Control Environment	W/P Reference
Version 7.7, dated September 2012		
The control environment sets the tone of an organization, influencing the control consciousness of its people. It is the foundation for all other components of internal control, providing discipline and structure. The auditor should obtain a sufficient understanding of the control environment to determine the impact that it may have on the overall effectiveness of the compensation system internal controls.		
1. Evaluate the most recently completed ICAPS for the Control Environment and Overall Accounting Controls for the rationale behind any moderate or high-risk assessment ratings and determine the impact, if any, on the effectiveness of the compensation system internal controls on the control environment.		
2. If an examination of the control environment has not been recently performed, evaluate all documented prior audit experience with the		

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contractor, including permanent files, relevant audit reports and working papers, suspected irregular conduct (SIC) referrals, and discussions with prior auditors. Obtain an understanding of the following factors:	
a. Integrity and ethical values.	
b. Commitment to competence.	
c. Board of directors and/or audit committee participation.	
d. Management’s philosophy and operating style.	
e. Organizational structure.	
f. Assignment of authority and responsibility.	
g. Human resource policies and procedures.	
h. Financial capability.	
3. Document your overall understanding of the control environment and the impact that it has on the nature and extent of testing of each control objective (W/Ps G, H, I, and J).	

D-1	Contractor Risk Assessment	W/P Reference
Version 7.7, dated September 2012		
The auditor should develop a sufficient understanding of the risk assessment process currently employed by the contractor in terms of its identification, analysis, and management of risks relevant to the establishment of reasonable compensation.		
1. Meet with responsible personnel to obtain an overview of the various risk factors considered by management.		
2. Once the various risk factors are identified, obtain an understanding of how management identifies the risks, estimates the significance of risks, assesses the likelihood of their occurrence, and relates them to contract reporting.		
3. If applicable, obtain an overview of any plans, programs, or actions management may initiate to address specific risks. Keep in mind that, depending on the nature of specific risks, management may elect to accept a given risk due to costs or other considerations.		
4. Document your overall understanding of the contractor’s risk assessment practices and the impact that it has on the nature and extent of testing of each control objective (W/Ps G, H, I, and J).		

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E-1	Information and Communications	W/P Reference
Version 7.7, dated September 2012		
<p>Information and communication processes consist of the methods and records established to record, process, summarize, and report contract cost data. The auditor should develop a sufficient understanding of the contractor’s information and communication processes (relevant to contract cost data) to identify significant classes of transactions and how they are initiated, processed, controlled, and reported. A necessary step in understanding the information and communication process is to trace selected transactions through the system (see Step 5 below). This will assist in validating the contractor’s demonstration of the system and identifying key controls requiring subsequent testing.</p>		
<p>1. Since the accounting and information systems are integral components of information and communication processes, evaluate the most recently completed ICAPS for the Control Environment and Overall Accounting Controls and the IT Systems General Internal Controls for the rationale behind any moderate or high-risk assessment ratings and determine the potential impact, if any, on the effectiveness of the compensation system internal controls on information and communications.</p>		
<p>2. Evaluate relevant permanent files, prior audit working papers, and any prior contractor demonstrations of its compensation system information and communication processes.</p>		
<p>3. Determine if the contractor has made changes to the information and communication processes in its compensation system since the last demonstration. Evaluate the changes. If no prior system demonstration was performed, have the contractor provide one. Contractor representatives providing the demonstration should possess a detailed knowledge of the compensation system. The demonstration provides the auditor an opportunity to query contractor personnel regarding internal controls and how they are monitored. The auditor should ensure that the demonstration addresses the internal control objectives outlined in CAM 5-800.</p>		
<p>4. The contractor should include appropriate manual and computerized controls in its information processing that check for accuracy, completeness, and proper authorization of compensation (labor) related transactions. Have the contractor identify and demonstrate controls related to each of the areas listed in a. through e. below. Compare the contractor disclosed controls with the generic access control listing contained in the referenced CAM section and identify any controls not incorporated in the application. Verify the existence and adequacy of the contractor disclosed controls. Discuss any</p>		

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apparent deficiencies with the contractor.	
a. Access Controls (CAM 5-1406.1)	
b. Data Input Controls (CAM 5-1406.2)	
c. Processing Controls (CAM 5-1406.3)	
d. Error Correction and Submission (CAM 5-1406.4)	
e. Output Controls (CAM 5-1406.5)	
5. Once the current compensation information and communication processes are demonstrated by the contractor, selectively trace the development of a compensation package through the compensation system to validate your understanding of the compensation system. By tracing a transaction, the auditor should document the validity and operation of the key controls demonstrated by the contractor in steps 2-4 above (e.g., management review, internal equity, external equity). Discrepancies between your understanding and the contractor’s demonstration should be resolved prior to completing the remainder of this examination.	
6. Document your confirmed understanding of the contractor’s compensation system information and communication processes and obtain a written confirmation from the contractor indicating that they agree with this understanding. This documentation will typically take the form of system flowcharts or narrative descriptions and can be prepared by the auditor or consist of documentation prepared by the contractor (see CAM 5-106). Based on your understanding of the contractor’s compensation system information and communication processes, document the impact that it will have on the nature and extent of testing of each control objective (W/Ps G, H, I, and J).	

F-1	Monitoring	W/P Reference
Version 7.7, dated September 2012		
Monitoring is a process that assesses the quality of internal control performance over time. It involves assessing the design and operation of controls on a timely basis and taking necessary corrective actions. The auditor should develop a sufficient understanding of the contractor’s ongoing monitoring activities and/or separate evaluations related to the compensation system internal controls.		
1. Determine if ongoing monitoring procedures are incorporated into the normal recurring activities of the contractor’s organization. These procedures should include regular management and supervisory activities.		

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2. Where applicable, determine the extent of internal audit involvement in performing monitoring functions through separate evaluations.	
3. Determine and document the extent of monitoring activities being performed by external parties.	
4. Document your overall understanding of the monitoring activity being performed at the contractor’s location and the impact it will have on the nature and extent of testing of each control objective (W/Ps G, H, I, and J).	

G-1	Management Reviews	W/P Reference
Version 7.7, dated September 2012		
The auditor should obtain an understanding of the contractor’s control activities for this control objective. A detailed understanding of control activities is essential to the assessment of control risk. Compensation system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.		
1. In planning the following audit procedures to understand the contractor’s control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control objective. Internal control components are as follows:		
<ul style="list-style-type: none"> • Control environment 		
<ul style="list-style-type: none"> • Contractor risk assessment 		
<ul style="list-style-type: none"> • Information and communications 		
<ul style="list-style-type: none"> • Monitoring 		
2. Verify that periodic reviews of contractor’s policies and procedures are conducted to ensure that:		
a. Policies and procedures are compliant with applicable Federal regulations and contract terms.		
b. Policies and procedures have been implemented and are working effectively.		

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c. Follow-up actions are taken on recommendations resulting from management reviews.	
3. Evaluate the contractor’s record of completed internal audits and its current internal audit plan to determine if the compensation system is being subjected to periodic reviews in accordance with established policies and procedures.	
4. Identify and selectively evaluate documentary evidence and the frequency of the contractor’s management reviews to determine whether the scope of such reviews are appropriate, the conclusions sound, and appropriate follow-up actions were taken.	
5. Identify any reviews which may have an impact on this examination, and evaluate the reports and supporting working papers to determine if any system deficiencies were noted, and the extent to which we can rely on the work performed (see CAM 4-1000).	

H-1	Organization	W/P Reference
Version 7.7, dated September 2012		
The auditor should obtain an understanding of the contractor’s control activities for this control objective. A detailed understanding of control activities is essential to the assessment of control risk. Compensation system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.		
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• Control environment		
• Contractor risk assessment		
• Information and communications		
• Monitoring		

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2. Obtain and evaluate organization charts and/or discuss the organization of the pay administration function with the contractor to determine if:	
a. There are clear lines of authority.	
b. Duties and responsibilities are defined to include responsibility for establishing, reviewing, and approving pay-range structure changes, starting pay rates, and pay increases.	

I-1	Policies and Procedures	W/P Reference
Version 7.7, dated September 2012		
The auditor should obtain an understanding of the contractor’s control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Compensation system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.		
1. In planning the following audit procedures to understand the contractor’s control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control objective. Internal control components are as follows:		
<ul style="list-style-type: none"> • Control environment 		
<ul style="list-style-type: none"> • Contractor risk assessment 		
<ul style="list-style-type: none"> • Information and communications 		
<ul style="list-style-type: none"> • Monitoring 		
2. Evaluate policies and procedures covering the contractor’s compensation program to ensure they provide for allowable, allocable, and reasonable compensation costs charged to Government contracts. The following elements of a compensation system should be identified and evaluated:		
a. Total compensation by each employee or by job class/grade level for performing market comparison tests to ensure the total		

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compensation package complies with the FAR allowability and allocability provisions. Ensure the total compensation includes supplemental benefits (CAM 5-808.1 & 5-808.2).	
b. Wage and salary structure. (CAM 5-808.3)	
c. Internal equity (job analysis, job descriptions and job evaluations). (CAM 5-808.5)	
d. External equity (pay policy, relevant market, external pay surveys, and market comparisons). (CAM 5-808.8)	
e. Fringe benefits provided to employees. (CAM 5-808.10)	
f. Methods to determine pay increases/promotions and the performance appraisal process. (CAM 5-808.11 and 12)	
3. For the executive pay program, in addition to the steps above, verify that policies and procedures include identification of the executives subject to the compensation ceiling amount (FAR 31.205-6(p)) and exclusion of amounts in excess of the allowable ceiling amount in submissions to the Government.	
4. Selectively test the contractor's current compensation structure to determine if established policies and procedures were followed.	
5. Based on the results of the steps above, assess the contractor's system for ensuring allowable, allocable, and reasonable compensation costs. If the contractor's system cannot be relied on for a determination of reasonableness perform independent tests of reasonableness to quantify the impact of the deficiencies, when possible. When reasonableness tests can not be performed due to significant deficiencies, report the deficiencies and recommend the contractor take the necessary corrective action.	

J-1	Training	W/P Reference
Version 7.7, dated September 2012		
<p>The auditor should obtain an understanding of the contractor's control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Compensation system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be</p>		

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performed, and control risk will be assessed as high.	
1. In planning the following audit procedures to understand the contractor’s control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control objective. Internal control components are as follows:	
<ul style="list-style-type: none"> • Control environment 	
<ul style="list-style-type: none"> • Contractor risk assessment 	
<ul style="list-style-type: none"> • Information and communications 	
<ul style="list-style-type: none"> • Monitoring 	
2. Obtain a listing of training classes given to pay administration employees.	
3. Evaluate the training materials to determine that the training places emphasis on assuring that compensation is reasonable in accordance with acceptable management pay policies.	
4. Selectively evaluate evidence that pay administration employees have been trained (e.g., evaluate training records, evaluate attendance rosters, interview employees).	

A-1	Concluding Steps	W/P Reference
Version 7.7, dated September 2012		
1. Assessment of Control Risk		
	a. Considering all five components of internal control (control environment, contractor risk assessment, information and communications, monitoring and control activities that relate to control objectives), assess control risk for each of the relevant control objectives (management reviews, organization, policies and procedures, and training). For each of the objectives, summarize the characteristics which support the assessed level of control risk and specifically identify any internal control weaknesses or system deficiencies.	
	b. Determine if the compensation system is adequate to reasonably assure proper pricing, administration, and settlement of Government contracts in accordance with applicable laws and regulations.	
	c. Based on the assessments above, determine the impact on the	

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scope of other audits.	
d. Complete the ICAPS form at W/P A (see CAM 3-305) (MAAR #1).	
e. Coordinate the results of audit with the supervisor. The supervisor and the FAO manager should review and initial the ICAPS form at W/P A before the exit conference is performed. If it is determined that additional audit steps are needed, any additional planned audit effort should be accomplished as part of this examination or immediately thereafter. Any delays in completing this audit effort should be documented and approved by management.	
2. Summary Steps	
a. Prepare a draft audit report in accordance with CAM 10-400.	
b. Conduct an exit conference with the contractor in accordance with CAM 4-304.	
c. Finalize the audit report incorporating the contractor's response and audit rejoinder.	
d. If the contractor has EVMS covered contracts, provide comments in the audit report on whether any findings are likely to impact the contractor's EVMS (10-1204.5.b). Discuss findings and recommendations relating to the EVMS with the Contract Administration Office EVMS Monitor prior to issuance of the report. Immediately evaluate the impact of these findings on specific EVMS covered contracts and provide the details in flash EVMS surveillance reports (11-203.5.b).	
e. Update the permanent file in accordance with CAM 4-405.b (MAAR #3). Retain a copy of the approved W/P A ICAPS form. After the audit report is issued, update the ICRS database using the information on the approved W/P A ICAPS form and file the approved W/P A ICAPS form in the Electronic Contractor Permanent File (ECPF). (The control risk assessment (Section II) and overall system opinion (Section III) in the ICAPS may not be updated until the system report supporting the change is issued (CAM 3-306a).)	