

Master Document – Audit Program

Activity Code 17330		Reconciliation of Contracts
Version 1.4, June 2012		
B-1	Planning Considerations	
Purpose and Scope		
<p>This program provides a logical sequence to the effort required to perform an audit of a contractor prepared reconciliation. It should reflect a mutual understanding between the auditor and supervisor as to the scope required to meet auditing standards and DCAA objectives. The steps in the program are intended as general guidance and should be expanded or eliminated as necessary to fit the audit.</p>		
<p>1. The purpose of a DCAA audit of a contractor prepared reconciliation is to produce an audit report that will be used by Governmental agencies as a basis to support required contract closing actions. Reconciliations can be prepared on both fixed price and cost reimbursable type contracts. The audit report will provide the necessary data that will allow DFAS to close the contract in the Mechanization of Contract Administration Services (MOCAS) System. The audit report will form the basis for any adjustments to MOCAS data to accomplish the closing.</p>		
<p>2. The audit of a contractor prepared reconciliation will be performed through coordination with DFAS, DCMA, the buying office, and the contractor. The goal of the process is to close out contracts by avoiding duplicate reconciliation efforts, while optimizing business decisions based upon the best available data. MOCAS data is shared with the contractor in order to assure that the reconciliation is as accurate and complete as possible before the audit begins. In preparing the reconciliation, the contractor will use its own files and records, as well as information provided by the Government. DCAA performs an audit of the contractor prepared reconciliation. DFAS-Columbus relies on the DCAA report and the contractor reconciliation to close the contract. Final payments, if any, are made to either the Government or the contractor, and the Government records are updated to reflect a closed contract.</p>		
<p>3. The contractor is responsible for preparing the reconciliation. The purpose of the reconciliation is to determine the amount owed or due to the contractor, if any, and to correct imbalances in MOCAS. Audit issues are openly discussed with the contractor as they arise. To facilitate settlement of audit issues, all attempts are made to ensure that there is agreement on the final audit results.</p>		

B-1	Preliminary Steps:	
Version 1.4, June 2012		<u>WP Reference</u>

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<p>Prior to performing the reconciliation audit, some preliminary effort is necessary to ensure the audit results in the most efficient use of resources. Auditors should perform the following steps:</p>	
<p>1. Review the 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”</p>	
<p>2. Verify that the contractor has been briefed on the initiative and agrees to participate.</p>	
<p>3. Verify that coordination has occurred with the region’s designated DFAS Task Force representative and/or DCAA Financial Liaison Advisor (FLA) at DFAS (DCAA-FLA-DFAS-CPS@dcaa.mil) regarding the selection of this contract for reconciliation, and either the region DFAS Task Force representative or the FLA at DFAS has confirmed that the Government records are sufficient to support the amounts that are currently in MOCAS for the subject contract.</p>	
<p>4. Verify that the contractor’s billing and payment records sufficiently identify costs by ACRN for the subject contract or can be mapped to ACRN using costs by CLIN (coordination with the regional DFAS Task Force representative may be helpful in making this determination).</p>	
<p>If records are not sufficient to perform a reconciliation, do not expend any further effort, and document this in a MEMORANDUM FOR FILE.</p>	
<p>5. Request the obligation and disbursement data (MOCAS History Report and Contingent Liability Report (CLR)) for the subject contract from the DCAA FLA at DFAS or the regional Task Force representative. The MOCAS history report shows the detailed obligation and disbursement transactions on the contract. The CLR provides summary data only, but it is the recognized official database to which the reconciliation totals must match. If the totals in the two reports do not match, coordinate with the regional Task Force representative or the FLA to obtain reports with corrected amounts.</p>	
<p>6. Prepare a coordination memorandum for DFAS requesting their concurrence to proceed with the reconciliation.</p>	
<p>7. 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</p>	

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scope of audit.	
8. 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.	
9. 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.	
10. Determine whether the contractor has policies and procedures for performing reconciliations and document your understanding of those procedures, if applicable.	
11. Issue a notification letter to the contractor regarding the audit in accordance with CAM 4-302.3.	
12. Provide the MOCAS data and other applicable data obtained from the ACO/PCO to the contractor to prepare the reconciliation and establish a due date for the submission.	
13. Determine if there is additional data the contractor needs that should be obtained from the ACO/PCO and request the data.	
14. Obtain and review the contractor's reconciliation to ensure that it was prepared in accordance with its reconciliation procedures, if applicable.	
15. Perform a cursory review of the contractor's reconciliation to ensure it includes a schedule of the basic contract and all contract modifications, with the modification date, description, affected CLIN(s), and adjustments to contract price and funded amount. Ensure that all recommended adjustments or modifications are identified and adequately explained.	
16. Review the contractor's reconciliation submission to ensure it includes a schedule of all billings and payments on the contract. This schedule should identify:	
a. If applicable, all progress payments, along with all invoice billings that identify gross billed amount, the applicable progress payment liquidation amount, and the amount paid;	
b. Any direct payments and refunds made on the contract caused by quarterly limitation of payment (QLOP) submissions;	

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<p>c. Any differences between the contractor-determined funded amount and obligation data in MOCAS; and;</p>	
<p>d. Any differences between what should have been paid for a particular invoice and what was actually paid. These invoices generally form the basis for further review during the DCAA audit, and may be the primary cause for discrepancies in the Governmental records.</p>	
<p>17. Ensure that all adjustments/payments requested as identified by the contractor are adequately explained and documented.</p>	
<p>18. Ensure that the contractor’s reconciliation includes all the contract obligation and disbursements by ACRN for all ACRNs contained in the CLR report.</p>	
<p>19. Consider the results of prior audits for potential impact on the current audit scope.</p>	
<p>20. Document the assessment of any contractor internal controls applicable to this audit.</p>	
<p>21. Determine the need for technical assistance and assist audits.</p>	
<p>22. 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 the relevant fraud indicators in CAM Figure 4-7-3. 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>	

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<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 4-7-3. <p>(To access the fraud handbook, copy and paste the web address shown above into the address block in Internet Explorer.)</p>	
<p>23. Provide a copy of the concurrence memo received from DFAS to the FLA at DFAS for registration of the contract in the DFAS reconciliation database.</p>	
<p>24. Summarize the results of the preliminary steps on working paper B.</p>	

C-1	Obligations - Contract Pricing and Funding	
Version 1.4, June 2012		WP Reference
1. For FFP Contracts:		
<p>a. Review the contractor's obligation reconciliation and note any differences in the comparisons of the MOCAS obligated and definitized price amounts and the contractor's identified obligation amounts.</p>		
<p>b. Verify that all modifications are included in the contractor prepared reconciliation. The last modifications issued under the contract are easy to overlook. These modifications may have de-obligated funds on the contract, and may even have reduced the contract price. Take the necessary steps to coordinate with all parties to ensure that all relevant modifications have been included in the contractor's reconciliation.</p>		
<p>c. Verify price and funded amounts to source documents. Trace amounts to modifications where differences were identified between the contractor's reconciliation and the current MOCAS history and CLR reports. Discuss any identified differences with the contractor and review the basis and any other supporting documentation for their recommended amounts. Source documents may include:</p> <ul style="list-style-type: none"> • Basic contract and modifications • Progress payments • DD 250's <p>Obtain contractor concurrence for any differences in the</p>		

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contractor's recommended amounts that resulted from review of their supporting documentation.	
d. Coordinate the results of the verification of contract price and funding with the contractor and Government representatives (i.e., DFAS, DCMA, etc.).	
2. For Cost Type Contracts:	
a. Review the contractor's obligation reconciliation and note any differences in the comparisons of the MOCAS obligated and definitized price amounts and the contractor's identified obligation amounts.	
b. Verify that all modifications are included in the contractor prepared reconciliation. The last modifications issued under the contract are easy to overlook. These modifications may have de-obligated funds on the contract, and may even have reduced the contract price. Take the necessary steps to coordinate with all parties to ensure that all relevant modifications have been included in the contractor's reconciliation.	
c. Verify price and funded amounts to source documents. Trace amounts to modifications where differences were identified between the contractor's reconciliation and the current MOCAS history and CLR reports. Discuss any identified differences with the contractor and review the basis and any other supporting documentation for their recommended amounts. Obtain contractor concurrence for any differences in the contractor's recommended amounts that resulted from review of their supporting documentation.	
d. Coordinate the results of the verification of contract price and funding with the contractor and Government representatives (i.e., DFAS, DCMA, etc.).	

D-1	Disbursements - Billing and Payment Receipts	
Version 1.4, June 2012		WP Reference
1. For FFP Contracts:		
a. Verify that the contractor's billing and payment receipt information included on the reconciliation is supportable by source documents. Trace these items to source documents paying particular attention to the items where there is a variance between the MOCAS disbursement amount and the contractor's billed and receipt amounts. Source documents may include:		

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<ul style="list-style-type: none"> • Contractor accounts receivable/billing/accounting records. • Contractor invoices, progress payments, QLOPs, etc. • Contractor correspondence on billing/payment/contract issues. • Progress payments • DD 250s 	
<p>b. Compare MOCAS disbursement amounts to the contractor billed amounts by ACRN. Identify the ACRNs, shipments, and/or invoices where differences occur. Determine the reasons for the differences and discuss them with the contractor. Reconciliation of progress payment liquidations, timing of deliveries, and delivery payments may be necessary to ensure that no overpayments were made to the contractor resulting from improperly liquidated invoices. Ensure that the contractor is not claiming to be paid for items that were never delivered to the Government.</p>	
<p>c. Determine the actual transaction adjustments needed, by invoice, at the ACRN level to correct contract line item (CLIN) disbursements and obtain the contractor’s concurrence as necessary.</p>	
<p>d. Coordinate with contractor and Government personnel to obtain a thorough understanding of any withholds or other issues that impact the adjustment(s) and/or final payment(s) on the contract. Coordinate the results of the verification of contract billing and payment receipts (disbursements) with the contractor and Government representatives (i.e., DFAS, DCMA, etc.).</p>	
<p>2. For Cost Type Contracts:</p>	
<p>a. Verify that the contractor’s billing and payment receipt information included on the reconciliation is supportable by source documents. Trace these items to source documents paying particular attention to the items where there is a variance between the MOCAS disbursement amount and the contractor's billed and receipt amounts. Source documents may include:</p> <ul style="list-style-type: none"> • Contractor accounts receivable/billing/accounting records. • Contractor invoices or public vouchers. • Contractor correspondence on billing/payment/contract issues. 	
<p>b. Compare MOCAS disbursement amounts to the contractor billed amounts by ACRN. Identify the ACRNs where differences occur. Determine the reasons for the differences and discuss them with the contractor.</p>	
<p>c. Determine the actual transaction adjustments needed, by invoice, at the ACRN level to correct contract line item (CLIN) disbursements and obtain the contractor’s concurrence as</p>	

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necessary.	
d. Coordinate with contractor and Government personnel to obtain a thorough understanding of any withholds or other issues that impact the adjustment(s) and/or final payment(s) on the contract. Coordinate the results of the verification of contract billing and payment receipts (disbursements) with the contractor and Government representatives (i.e., DFAS, DCMA, etc.).	
3. Summarize all final amounts at the ACRN level.	
4. Determine the final amount due to the contractor or owed to the Government. For fixed price contracts, this amount should be the difference between the verified contract price and the verified amount paid on the contract, unless all deliveries were not made during contract performance. For cost type contracts, the amount should be the difference between the valid contractor billed amounts and amounts paid to the contractor by the Government. If the verified contract obligation amount is greater than the verified amount paid, and no additional payments are due, identify this amount as excess funds on the contract that can be deobligated.	

A-1	Concluding Steps	
Version 1.4, June 2012		WP Reference
1. Summary Steps		
a. Summarize the results of audit. Provide the draft report to the DFAS Task Force representative or other appropriate regional personnel.		
b. Discuss results with the technical specialist and/or the regional DFAS Task Force representative and obtain final supervisory review. Coordinate significant issues with the requester, if applicable.		
c. Hold an exit conference with the contractor in accordance with CAM 4-304. Provide the draft report to the contractor, discuss each exception/finding, and request a response for inclusion in the final report. Incorporate the contractor’s response and prepare the final report.		
d. If the evaluation discloses information that raises reasonable suspicion of fraudulent or other illegal acts, refer the matter by completing a DCAA Form 2000 (see CAM 4-702).		