

Master Document – Audit Program

Activity Code 19411		Compliance Audit CAS 411
Version 5.8, dated June 2012		
B-1	Planning Considerations	
Purpose and Scope		
<ol style="list-style-type: none"> 1. The purpose of CAS compliance auditing is to determine if the contractor's policies, procedures, and practices used to estimate, accumulate, and report costs on Government contracts and subcontracts comply with the requirements of CAS. CAS 411 establishes criteria for the accounting of the acquisition costs of material. The standard does not cover accounting for the acquisition costs of tangible capital assets nor accountability for Government furnished materials. FAR 52.230-2, Cost Accounting Standards, requires the contractor to comply with the CAS 411 criteria. 2. The scope of this audit should be limited to the last completed contractor fiscal year. For efficiency, CAS compliance testing, if possible, should be performed concurrently with tests for compliance with FAR and contract terms. 3. This program is intended to provide for the proper planning, performance, and reporting on the contractor's compliance with CAS 411. The audit steps in the program should reflect a documented understanding between the auditor, the technical specialist, and/or the supervisor as to the scope required to comply in an efficient and effective manner with generally accepted auditing standards and DCAA objectives. The program steps are intended as general guidance and should be tailored as determined by audit risk. 		
Other Planning Considerations		
<ol style="list-style-type: none"> 1. Before beginning any CAS compliance audit, the auditor should first determine the contractor is subject to the CAS coverage. If the standard is not applicable to the contractor, the audit should be cancelled. 2. Materiality (see 48 CFR 9903.305) and audit risk assessment (including Internal Control Audit Planning Summary (ICAPS) for major contractors, ICQ for nonmajors, and historical CAS problems) are integral parts of the planning process and should be considered in developing the extent of CAS compliance tests. 3. Once it is determined that the standard is applicable, the auditor should assess which provisions of the standard are significant to the contractor; the extent of reliance that may be placed on the contractor's system of internal controls to ensure compliance; and the results of other relevant audits (e.g., results of prior compliance audits, Disclosure Statement examinations, etc.). The decision to not test whether the contractor is complying with specific provisions of the standard should be documented. 		

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B-1	Preliminary Steps	W/P Reference
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1. Research and Planning		
a. 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"		
b. Read and become familiar with the criteria in CAS 411, CAM 8-411, and any recent Headquarters guidance not incorporated in CAM.		
c. Evaluate Parts II and III of the contractor's Disclosure Statement to become familiar with the disclosed accounting practices. Determine if the contractor's accounting system has remained unchanged since the last CAS 411 compliance audit. If changes have occurred, adjust audit scope accordingly.		
d. Evaluate recent forward pricing or incurred cost proposals to determine whether total costs subject to CAS 411 are material. Consider contractor's sales mix (i.e., CAS-covered Government contracts vs. non-CAS-covered and commercial). Materiality should be a consideration only in determining the extent of substantive testing.		
e. Examine other FAO permanent file data (e.g. relevant audit leads, MAARs Control Log for MAAR 10, Adjusting Entries and Exception Reports, and MAAR 13, Purchases Existence and Consumption) and prior relevant audit work packages to determine what data are available, what audit steps were done in the past, and the results from those steps. This will identify areas of high risk and/or areas where limited or no compliance testing is necessary. Document results.		
f. If appropriate, coordinate with the FAO technical specialist, CAC, and/or regional specialist on matters of interpretation and policy.		
g. 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		

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unfavorable or adverse financial conditions, they should immediately communicate their concerns to the contracting officer, and appropriately adjust the scope of audit.	
h. Electronically transmit an acknowledgement/notification to the ACO/CAFO 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.	
2. Entrance Conference and Preparation	
a. Arrange and conduct an entrance conference covering the areas highlighted in CAM 4-302 with particular emphasis on:	
(1) Requesting the contractor's explanation of the internal control structure as related to CAS 411.	
(2) Any changes since the last audit.	
(3) The contractor's monitoring process for classifying costs.	
(4) Any identified weaknesses which may have been reported and related follow-up actions.	
b. If reliance is to be placed on the work of others, the file should contain the required documentation (see CAM 4-1000).	
c. Issue a notification letter to the contractor regarding the audit in accordance with CAM 4-302.3.	
3. Risk Assessment	
a. Examine the ICQ or relevant ICAPS (whichever is applicable), to obtain information regarding accounting system adequacy, identify any known outstanding system deficiencies, and perform preliminary assessment of risk. Document results.	
b. 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.	
c. Hold a planning meeting with the audit team (e.g., RAM,	

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<p>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> <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>d. From the information gathered in the preceding steps and using the materiality criteria in 48 CFR 9903.305, identify and document the provisions of CAS 411 which are significant, assess the audit risk and determine the scope of audit and extent of compliance testing to be performed.</p>	
<p>e. Update the information in the permanent files as needed. (MAAR 3)</p>	

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C-1	Accounting for Acquisition Costs of Material	W/P Reference
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NOTE: The evaluation of Policies and Procedures for compliance with CAS 411 requirements is mandatory for Material Management and Accounting system (MMAS) examinations. If a recent MMAS examination has been performed the steps below will have already been accomplished. Refer to the MMAS examination and incorporate the results of those audit program steps where applicable.		
1. Determine that the contractor has and consistently applies written statements of accounting policies and practices for accumulating the costs of material and for allocating costs of material to cost objectives (CAS 411.40(a) and MMAS Standards 1 and 7). The written statements of policies and procedures should address:		
a. Detailed descriptions of a material inventory record and an explanation on how it is used.		
b. Detailed description of the contractor’s practices regarding material adjustments (discounts, credits, extra charges, etc.).		
c. Specific conditions and the requirements under which material costs may be directly allocated to cost objectives.		
d. The inventory costing method to be used for allocating material costs issued from inventory.		
2. Determine that the written statements of accounting policies and practices are consistent with the requirements of CAS 411 (MMAS Standards 1 and 7).		
3. MMAS Standard 1, requires the contractor to provide an adequate system description, including policies and procedures, and operating instructions compliant with FAR/CAS criteria.		
NOTE: The following steps require transaction testing to validate compliance with the requirements of CAS 411. The nature, timing and extent of testing will be based on the Risk Assessment information as documented in WP section B. The auditor should be aware that tests of details may have already been performed, or may need to be performed, for current MAAR 10 (Adjusting Entries and Exception Reports), MAAR 13 (Purchases Existence and Consumption) and Material System (ICAPS) examinations. All tests of details performed for CAS 411 compliance examinations are also applicable to MMAS audits (MMAS Standard 7). The auditor should coordinate the testing of details, if possible, to incorporate the needs for the other evaluations to maximize audit resources. If testing for any of the other evaluations has been performed recently the auditor should consider incorporating the		

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transaction testing results if possible.	
4. Determine that the cost of a category of material is (CAS 411.50(a)):	
a. The purchase price of material,	
b. Adjusted for extra charges, discounts and credits that are charged to the same cost objective as the purchase price unless impractical.	
c. If impractical, the auditor should determine that the contractor has a policy in place to provide for the allocation of such charges or credits to an appropriate indirect pool, and that the practice is consistently followed.	
5. Verify that, except as provided for in Steps 6 and 7 below, the cost of a category of material is accounted for in material inventory records (CAS 411.40(d)), such as card files, computer data, bin tags, or any other such informational record.	
a. Determine that when the cost of materials is issued from a company-owned inventory, the costing method used is a consistent method which results in a systematic and rational costing of issues of material to cost objectives (CAS 411.50(b)). One of the following methods shall be used:	
(1) First-In, First-out (FIFO),	
(2) Moving average,	
(3) Weighted average,	
(4) Standard cost, or	
(5) Last-in, First-out (LIFO).	
b. Determine that the same costing method is used for similar categories of material. (CAS 411.50(c)).	
6. The costs of units of a material may be allocated directly to a cost objective provided the costs objective was specifically identified at the time the units were purchased or produced (CAS 411.40(b)). For materials charged directly, determine that the cost objective was specifically identified at the time the units were purchased or produced.	
7. Material may be allocated to an indirect pool, if it is used solely in performing indirect functions or if it is not a significant element of production costs, whether or not incorporated in an end product (CAS 411.40(c)). The auditor should determine that:	
a. Material allocated to an indirect pool are materials used solely in performing indirect functions, or	

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b. The materials allocated to an indirect pool are not a significant element of production costs, and	
c. When the excess of ending inventory over beginning inventory of material allocated to an indirect pool is estimated to be significant in relation to total cost included in the pool, the cost of such unconsumed material is established as an asset at the end of the period by reducing the indirect cost pool by a corresponding amount (CAS 411.50(d)).	

A-1	Concluding Steps	W/P Reference
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1.	Summarize the results of audit.	
2.	Discuss the audit results with the supervisor or the FAO technical specialist. The auditor should only report those noncompliances which are considered material (see CAM 8-302.7).	
3.	Coordinate significant or unusual issues with the CFAO, FAO Manager, and if applicable, with the CAC, CHOA, or GAC network (see CAM 8-302.4 and 8-302.6). Coordination should be both before and after discussion of audit results with the contractor. The CFAO should be apprised of noncompliance matters at the earliest possible date. If a noncompliance is considered immaterial, recommend to the CFAO that the contractor be notified to correct the noncompliance and if the noncompliance is not corrected, that the Government reserves the right to make appropriate contract adjustments should the cost impact become material (see FAR 30.602).	
4.	Prepare draft audit report. If the audit scope was limited to a certain area(s) of the contractor’s accounting practices, modify the scope and opinion statements as necessary so that they clearly identify the limited areas audited.	
a.	If no instances of noncompliance are found, prepare a draft audit report in accordance with CAM 10-807 (activity code 19411).	
b.	If instances of noncompliances are found, open an assignment under activity code 19200, prepare an audit report in accordance with CAM 10-808, and close this 19411 compliance assignment with a MFR.	
5.	If an internal control system deficiency is detected during the course of this audit, immediately draft a flash internal control report and submit it to the contractor for comment in accordance with CAM 10-413.	

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6. Conduct an exit conference with the contractor in accordance with CAM 4-304.	
7. Finalize audit report incorporating the contractor's response and audit rejoinder, if applicable.	
8. Update the permanent files. <i>Ensure that a copy of DMIS Report No. CAS 3 entitled "CAS Compliance Testing (Activity Code 194XX)" is included in the permanent file after the assignment has been closed in DMIS.</i>	