

Master Document – Audit Program

Activity Code 19417		Compliance Audit CAS 417
Version 5.9, 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 417 establishes the criteria for the measurement of the cost of money attributable to capital assets under construction, fabrication, or development as an element of the cost of those assets. FAR 52.230-2, Cost Accounting Standards, requires the contractor to comply with the CAS 417 criteria (48 CFR 9904.417). FAR 31.205-10 makes CAS 417 applicable to all contracts, even contracts which are not CAS-covered or subject only to modified CAS coverage. Auditors should ensure that proposed or claimed cost of money costs, when significant, are in compliance with the provisions of CAS 417. 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 417. The audit steps in the program should reflect a documented understanding between the auditor and the CAS 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. FAR 31.205-10(b) allows cost of money for capital assets under construction, whether or not the contract is otherwise subject to CAS. 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 and material to the Government, the auditor should assess which provisions of the standard are significant to the contractor; the extent reliance may be placed on the contractor's system of internal controls to ensure compliance; and the results of relevant other audits (e.g., results of prior compliance audits, 		

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Disclosure Statement revisions, etc.). The decision to not test whether the contractor is complying with specific provisions of the standard should be documented.

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 417, CAM 8-417, and any recent Headquarters guidance not incorporated in CAM.	
	c. Evaluate recent forward pricing or incurred cost proposals to determine whether total costs subject to CAS 417 are material. Consider contractor’s sales mix (i.e., CAS-covered Government contracts vs. non-CAS-covered and commercial) when determining materiality of costs subject to this standard. Materiality should be a consideration only in determining the extent of substantive testing.	
	d. An important consideration for assessing risk for capital assets under construction is the adequacy of the contractor’s accounting system. The auditor should determine whether the contractor’s accounting system adequately records costs by project or asset and design a transaction testing plan accordingly. If the accounting practices for recording capital assets under construction have changed since the last CAS 417 compliance audit, increased risk may result.	
	e. Evaluate related parts 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 417 compliance audit. If changes have occurred, adjust audit scope accordingly.	
	f. Examine the FAO permanent files (e.g., relevant audit leads and MAARs Control Log) 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	

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necessary.	
g. If appropriate, coordinate with the FAO technical specialist, CAC, and/or regional specialist on matters of interpretation and policy.	
h. 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.	
i. 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.	
(2) Any changes since the last CAS 417 audit.	
(3) The contractor's monitoring process.	
(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	

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<p>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.</p>	
<p>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.</p>	
<p>c. 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> <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>	

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d. From the information gathered in the preceding steps and using the materiality criteria in 48 CFR 9903.305 assess the audit risk and determine the scope of audit and extent of compliance testing to be performed.	
e. Update the permanent files (MAAR 3).	

C-1	Construction-In-Process	W/P Reference
Version 5.9, dated June 2012		
1.	Evaluate the contractor's construction-in-process accounts for assets for each cost accounting period (subsequent to the applicability date) to determine:	
a.	Whether the assets are subject to cost of money (COM). The auditor should assure that:	
	(1) The asset is being constructed, fabricated, or developed for a contractor's own use. COM for CAS 417 purposes are included in the acquisition costs of the constructed assets only when the assets will be for a contractor's own use.	
	(2) The allowability or unallowability of costs of the asset under construction as related to its intended purpose is considered before any COM is allowed under CAS 417. (Completion of this step will assist in accomplishing MAAR 16.)	
b.	Determine whether the construction projects include all direct and indirect costs properly allocable to such projects. (Completion of this step will assist in accomplishing MAAR 18.)	
	One of the elements of such properly allocable costs is a share of the COM computed in accordance with CAS 414 for the investment in facilities which are already in service. Illustration of this requirement is included in CAS 417.60(a).	
2.	Evaluate the contractor's supporting documentation for the COM to be included in the acquisition cost of assets, for each cost accounting period. (Completion of this step will assist in accomplishing MAAR 19.)	
a.	Determine that such computation is based on a representative investment amount which gives appropriate consideration to the rate at which the costs of construction are incurred (CAS 417.50(a)(2)).	
	(1) When the costs are incurred at a fairly uniform rate throughout the period, the mean average beginning and ending balances of the cost accounting period can be used to determine the	

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representative investment amounts. See CAS 417.60(b) for an illustration of this criterion.	
(2) When major fluctuations are expected in the rate of cost incurrence during the cost accounting period, the use of the mean average for the beginning and ending balances (see Step 2.a.(1) above) will not produce a representative investment amount. In this case, determine that one of the following alternative methods are used:	
(a) Average the month-end-balances for the cost accounting period, or	
(b) Make separate calculations, using an appropriate investment amount and COM rate, for each month. See CAS 417.60(a) for an illustration of these criteria.	
b. Determine that the representative investment amount computed under step 2.a. above is factored by the applicable Secretary of the Treasury COM rate to calculate the cost of money dollars that are added to the construction-in-process account (CAS 417.50(a)(1)).	
(1) The COM rates to be used for each cost accounting period are the same rates published by the Secretary of Treasury for use in CAS 414 COM calculations.	
(2) When more than one COM rate is applicable to a cost accounting period, their time-weighted average will be used as the rate to be applied to the representative investment amount for each asset. See CAS 417.60(a) and (b) for an illustration of this criteria.	
(3) Where separate calculations for the COM are made each month (as provided in step 2.a(2) above), the sum of the monthly amounts may be entered into the construction-in-progress account once each cost accounting period.	
c. Determine that the COM dollars computed for a cost accounting period are included in the subsequent period's dollar balances used to calculate the representative investment amounts in accordance with 2.a(1) and (2) above. [See CAS 417.60(a) and (b) for an illustration of this requirement.]	
3. The contractor is permitted to use other methods for calculating the COM, such as the method used for financial accounting. When such an alternate method is used, determine that the result does not differ materially from the amount calculated using the COM rate per Steps 1 and 2 above (CAS 417.50(a)(3)).	
4. Determine that the COM is not capitalized when substantially all the activity necessary to get the asset ready for its intended use are discontinued. [However, the capitalization may still continue when	

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discontinuance arises out of causes beyond the control and without the fault or negligence of the contractor.]	
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A-1	Concluding Steps	W/P Reference
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1.	Summarize the results of audit.	
2.	Discuss the audit results with the technical specialist and/or the supervisor. 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 a 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 19417).	
	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 19417 compliance assignment with an MFR.	
5.	If an internal control system deficiency is detected during the course of this audit, draft a flash internal control report and submit it to the contractor for comment in accordance with CAM 10-413.	
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</i>	

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