



DEFENSE CONTRACT AUDIT AGENCY
DEPARTMENT OF DEFENSE
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IN REPLY REFER TO

PSP 730.5.01.A/2010-022 and 2010-036

September 27, 2012
12-PSP-024(R)

MEMORANDUM FOR REGIONAL DIRECTORS, DCAA
DIRECTOR, FIELD DETACHMENT, DCAA
HEADS OF PRINCIPAL STAFF ELEMENTS, HQ, DCAA

SUBJECT: Revised Audit Program for Forward Pricing Rate Proposal Audits and Issuance of an Adequacy Checklist for Forward Pricing Rate Proposals

SUMMARY

Effective immediately, all forward pricing rate proposal (FPRP) audits (Activity Code 23000) at the segment/division level shall be accomplished using the revised standard audit program (Version 5.0) (Enclosure 1). Audit teams performing current FPRP audits do not have to update the in-process audits for this new audit program. The audit program has been redesigned to utilize a combination of tests of details and analytical tools to effectively and efficiently audit the contractor's proposal and provide a timely quality audit that meets the Generally Accepted Government Auditing Standards (GAGAS). Additionally, an adequacy checklist (Enclosure 2) has been developed to assist audit teams in assessing the adequacy of forward pricing rate proposals.

BACKGROUND

Thanks to the efforts of an ad hoc group of field auditors, we believe a significant step forward has been taken to support the effective and efficient audit of FPRPs. The ad hoc determined the need to revise the standard audit program used to conduct FPRP audits at the segment/division level and to develop a checklist to assess the adequacy of FPRPs. In addition, each Region and Field Detachment helped to refine the audit program and new adequacy checklist.

GUIDANCE

All FPRP audits (Activity Code 23000) at the segment/division level established on or after the date of this memorandum shall use the revised audit program. Audit teams performing current FPRP audits do not have to update the in-process audits for this new audit program; however, they should review the new audit program to determine if there are effective approaches and procedures that may assist them in the completion of their specific audit objectives. Auditors may find elements of the subject audit program useful to conduct corporate and intermediate home office (IHO) audits, but the audit program is not primarily designed for use at those locations. The adequacy checklist is a tool to assist audit teams in assessing the adequacy of the proposal. The APPS has been updated to deliver the revised audit program and adequacy checklist with all new assignments, and is also available on the DCAA intranet.

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The FPRP standard audit program has been revised to encourage the use of regression analysis as an efficient method to assess the proposed forward pricing rates. In most cases, regression analysis combined with sufficient tests of details of the underlying data and contractor budgetary assumptions should provide sufficient appropriate evidence to support a quality audit compliant with GAGAS. Auditors are reminded that transaction testing is only one form of tests of details. Testing the underlying assumptions supporting the budgetary amounts for reasonableness is also a test of details. When the underlying assumptions are based on historical amounts, some level of limited transaction testing may be necessary if no other incurred cost testing has been completed on significant historical amounts. The procedures included in the revised audit program are not all-inclusive and are not applicable to all circumstances. The audit team must tailor the audit program steps based on the results of the risk assessment and the specific circumstances related to the contractor.

The Preliminary Steps, Section B-01, include a step for the Government team to hold a walk-through meeting so the contractor can identify and explain the basis of the estimates, related supporting documentation, and relevant internal controls. In addition, Section B-01 has been enhanced for audit teams to assess the incoming allocations from the corporate home office, IHO, and shared services at the segment level to determine whether these costs can be examined at the segment level or whether an assist audit is needed. The audit team should consider the materiality of the incoming allocations; a comparative analysis of prior year(s) proposed/actual allocated costs as compared to the current proposal, looking to the variability and consistency of the allocated costs; and whether the application of a decrement to the proposed allocations will provide appropriate audit coverage versus requesting an assist audit.

The audit procedures are designed to encompass the use of multiple trend analyses that build on the knowledge gained from each procedure. As part of the risk assessment, audit teams perform a high level trend analysis focused on the overall pools, bases, and rates. As part of the detailed procedures, audit teams will perform an in-depth trend analysis of specific cost elements focusing on the historical cost of elements of the pool and base costs in Section C-01, Testing Reliability of Historical Data, and then comparing the historical trend analyses to the forecasted pool and base costs in Sections E-01 and F-01, Indirect Rates and G&A Rates, respectively.

When the contractor submits an update to the initial FPRP, audit teams should ask the contractor to clearly identify and explain the changes so an effective risk assessment can be performed. An entire new audit may not be needed. Depending on the changes, the audit team may only need to perform analytical procedures on the updated portion, which combined with the tests of details performed on the initial proposal, will support compliance with GAGAS. The results could be reported as a supplement to the initial audit report or in an individual price proposal audit (Activity codes 21000 and 27000) along with appropriate referencing to the audit of the initial proposal.

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A well-supported FPRP will facilitate the timely and efficient completion of a forward pricing rate audit, reduce contractor effort needed to support the audit, and facilitate the negotiation process. To assist audit teams in the assessment of FPRP submissions, the ad hoc developed an adequacy checklist. The checklist requirements are linked to the Federal Acquisition Regulations (FAR) and Defense FAR Supplement criteria.

Defense Contract Audit Agency Institute (DCAI) is developing a training seminar on forward pricing rate proposal audits. The seminar will be available for auditors next fiscal year.

CLOSING REMARKS

FAO personnel should direct questions regarding this memorandum to their regional offices, and regional personnel should direct any questions to Pricing and Special Projects Division at (703) 767-3290 or e-mail at DCAA-PSP@dcaa.mil.

/Signed/
John C. Shire
Deputy Assistant Director
Policy and Plans

Enclosures:
a/s

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Activity Code 23000	Forward Pricing Rate Proposal Audit
Version 5.0, dated September 2012	
B-1	Planning Considerations
<p>This standard audit program assists the auditor in planning and performing the audit of a forward pricing rate proposal to evaluate the proposal for its acceptability in determining fair and reasonable rates and factors for the award, administration, modification, or re-pricing of Government contracts. The audit steps contained in the program can be used on a stand-alone basis or in conjunction with the Agency’s price proposal audit steps. The audit steps should be tailored, as appropriate to the contractor’s specific circumstances, and reflect an understanding among the audit team as to the scope required to meet auditing standards and DCAA objectives for the current assignment. Portions of the audit, which are covered in other assignments (e.g. incurred cost, disclosure statement, and internal control audits), should be referenced at the appropriate place in the audit program.</p>	
<p>The audit program can also be used when the contractor updates an initial submission during the year. Audit teams should gain an understanding of the changes and accomplish a risk assessment to tailor appropriate audit coverage. Audit teams should focus on the updates, as an entire new audit may not be required. The audit team may only need to perform analytical procedures on the updated portion, which combined with the tests of details performed in the audit of the initial proposal support compliance with GAGAS.</p>	
<p>Auditors are reminded that transaction testing is only one form of tests of details. Testing the underlying assumptions supporting the budgetary amounts for reasonableness is also a test of details. When the underlying assumptions are based on historical amounts some level of limited transaction testing may be necessary, if no other incurred cost testing has been completed on the historical amounts.</p>	
Purpose and Scope	
<p>1. This audit program is designed to provide general guidance for evaluating whether the contractor's proposed forward pricing rates comply with FAR, CAS, DFARS and other Agency Supplements, if applicable.</p>	
<p>2. This audit program covers the reviews of labor rates, overhead rates, G&A rates, and Cost of Money factors which either lead to establishment of formal or informal forward pricing rate agreements, or will form the basis of subsequent auditor recommendations regarding prospective costs.</p>	
<p>3. The scope of the examination will generally depend on individual circumstances. The audit procedures must be tailored based on the results of the risk assessment.</p>	
<p>For the calendar year’s initial proposal, as a minimum, the scope should include steps to determine that (i) rate computations are mathematically correct; (ii) projected business volume, allocation bases, and indirect costs are reasonable and in consonance with the contractor's internal plans; (iii) rate data are valid and current; and (iv) estimating practices comply with established or disclosed estimating and cost accounting practices.</p>	

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<p>For any updates to the calendar year’s initial proposal, the audit team should gain an understanding of the changes and accomplish a risk assessment which will determine if an entire new audit is warranted and the appropriate procedures. Analytical procedures performed on the updated section of the new submission, which combined with the detailed audit of the initial submission, should be compliant with GAGAS. The audit results may then be reported as a supplement to the initial report issued, or could be reported within the next price proposal audit.</p>
References
1. FAR/DFARS/DFARS-PGI/Other Agency Supplements, if applicable; 15.403-5; 15.407--FPRAs, FAR 15.408, FAR Table 15-2, and FAR 42.1701.
2. FAR/DFARS/Other Agency Supplements Parts 30 and 31, CAS.
3. CAM 8-000 -- Cost Accounting Standards.
4. CAM 9-000 -- Audits of Cost Estimates and Price Proposals
5. CAM Appendix D--- Technical Specialist Assistance.
6. CAM 10-200 – Audit Report Format and Contents (General)
7. CAM 10-200 – Audit Reports on Price Proposals
8. CAM Appendix D-400 – Cost Estimating Methods
9. CAM Appendix B – Statistical Sampling Techniques
10. CAM Appendix E -- Graphic and Computational Analysis Techniques.
11. Parametric Estimating Handbook, located at http://www.ispa-cost.org/ , CAM 9-1000 – Audit of Parametric Cost Estimates
12. DCAA Pamphlet 7641.74 – Use of Economic Indexes in Contract Audit

B-01	Preliminary Steps	WP Reference
Version 5.0, dated September 2012		
1.	Review the open MRDs 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”	
2.	If this is a requested audit, review the audit request to determine the nature and objective of the audit. Note any specific information requested and special requirements. Contact the requestor to obtain clarifications of the request and discuss any specific concerns or special requirements they may have. If self-initiated, notify the contracting officer of the commencement of the audit.	
3.	Review the proposal package for adequacy using the checklist for Forward Pricing Rate Proposals found at [REDACTED]. If proposal inadequacies have been identified in your adequacy assessment, discuss them with contractor and the contracting officer and recommend a course of action.	
4.	Send an initial acknowledgement/notification memorandum to the requestor (MRD 09-PAS-024(R) dated September 9, 2010) notifying	

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<p>them of the start of the risk assessment and that the expected completion date will be provided in a formal acknowledgment/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>5. Coordinate with contractor and contracting officer and obtain a walk-through of the proposal to gain an understanding of the basis of the proposal and related supporting documentation. Invite the contracting officer. As part of this walk-through, discuss any inadequacies identified and require the contractor to:</p> <ul style="list-style-type: none"> a. Explain the basis of estimate for significant pools, bases and cost elements b. Explain the processes used to develop the estimates and the internal controls/policies and procedures related to those areas c. Demonstrate how the numbers/amounts for the significant pools, bases, cost elements and factors are derived d. Demonstrate how historical trend data was considered in the development of the FPRP e. Demonstrate the homogeneity of pool costs and allocation bases used are appropriate f. Identify the significant items that were updated or revised and the overall impact of the changes <p>If the submission is a revision/update to the forward pricing rates for the year (i.e., not the first submission for the year), have the contractor explain the reasons for the update and identify the changes between the original submission for the year and the new revision/update. (FAR 15.408 Table 15-2 I., <i>General Instructions</i>, B.; DFARS 215.407-5-70(d)(2)(iv))?</p> <p>At the conclusion of the walk-through, summarize with the contractor any additional items/data needed for the audit that were not furnished with the FPRP or were not provided during the walk-through.</p>	
<p>6. Make a final determination of overall adequacy based on initial adequacy review and results of the walk-through. If inadequate, discuss with the contractor and requestor and follow-up in writing identifying the specific concerns and recommend the contracting officer return the proposal to the contractor.</p>	
<p>7. Document the materiality and sensitivity of the FPRP by obtaining and analyzing the proposed dollar value of the pools and bases; contractor mix of contract types; mix of Government/commercial business; special contract terms (e.g., ceilings on rates); etc. Summarize the impact on the audit scope of these factors in W/P B, Section 1.</p>	

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<p>8. Review permanent files and prior/in-process audits for significant and relevant inherent risk factors such as, but not limited to:</p> <ol style="list-style-type: none"> a. Audit leads, including contractor mandatory disclosures required by FAR 52.203-13(b)(3)(i) b. Prior audit findings c. Outstanding FAR and CAS noncompliances d. Cost avoidance recommendations from recent operation audits e. Disclosed accounting changes f. Planned or executed business reorganizations; mergers; acquisitions, or divestitures g. Contractor cost savings or cost reduction initiatives h. Advance Agreements <p>Summarize the impact on audit scope of these factors in W/P B, Section 2.</p>	
<p>9. Perform a high level trend analysis at the total indirect pool/base level using historical data to assess the risk of ineffective controls over estimating by performing the following steps: (CAM Appendix E)</p> <p><i>Example Risk Factors:</i></p> <ul style="list-style-type: none"> • <i>Consistent underestimating of base costs</i> • <i>Consistent overestimating of pool expenses</i> • <i>Trend of costs/rates over time as compared to estimates (e.g., rates historically are flat but the contractor is forecasting an increase in its rates)</i> 	
<p>a. Determine and assess whether there have been any organizational structure changes, unusual events, or accounting changes where the historical trend analysis may not be appropriate or may require adjustment.</p>	
<p>b. To determine overall historical accuracy of contractor estimates, compare total forecasted pool and base costs and resulting rate to actual pool, base, and rate for relevant historical period. This needs to consider out years (i.e., how well did the contractor estimate rates for 2011 in 2008, 2009, and 2010).</p>	
<p>c. Document and summarize impact of trend analysis on audit risk and scope in W/P B, Section 2</p>	
<p>10. Analyze the corporate, intermediate home office and/or shared services allocations assigned to the pool and base costs to determine appropriate audit coverage by performing the following steps:</p>	
<p>a. Determine if allocated costs included in the FPRP have been audited by the FAO(s) cognizant of the allocated costs. If not, ask the cognizant auditors if there have been accounting and organizational changes which affect the allocation of costs among the segments.</p>	
<p>b. Document the materiality of the incoming allocations.</p>	
<p>c. Perform comparative analysis of prior year(s) proposed/actual allocated cost to determine:</p>	

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<p>1) If there is wide variability historically in the amount/proportion of allocated costs in the indirect rate pool(s), and 2) If the current proposed amount/proportion is consistent with history.</p>	
<p>d. Based on the materiality of allocated costs and the results of trend analysis in steps a., b., and c. above, determine if procedures (such as a decrement based on historically questioned cost) can be accomplished at the segment level upon which to base an audit opinion on the indirect rates and tailor the steps accordingly in Section I or determine if an assist audit is needed from the cognizant FAO. In step 13 below, request needed assist audits.</p>	
<p>11. 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 proposal. 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 that would present heighten risk for fraud, 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><i>Principle Sources of Fraud Indicators:</i> 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</p> <p>(To access the fraud handbook, copy and paste the web address</p>	

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<p>shown above into the address block in Internet Explorer.)</p>	
<p>12. Document your understanding of the relevant contractor internal controls related to the significant rates, costs, or factors included in the FPRP on W/P B-02.</p>	
<p>13. When the evidence to be obtained during the audit is dependent on computerized information systems, document on W/P B-02 the audit work previously performed or to be performed that supports reliance on the computer-based evidence.</p> <p><i>Note: When sufficient work will not be performed to determine reliability, qualify the audit report in accordance with CAM 10-210.4j.</i></p>	
<p>14. Determine the need for assist audits and document on W/P B-03. Coordinate, as necessary, with the Field Detachment to determine if assistance is needed. Coordinate and request assist audits from the FAOs cognizant of the corporate home office/intermediate home office/shared service allocations as determined in step 9 above.</p>	
<p>15. Identify and document the need for technical assistance based on the understanding of the bases of estimate. Considering risk and materiality, prepare a detailed request for technical assistance if required and document on W/P B-03. (CAM Appendix D)</p>	
<p>16. From the information gathered in the preceding steps, assess the Government's risk associated with specific pools, bases, cost elements, etc. and tailor your audit scope accordingly. Provide an overall summary of the impact of the risk factors (materiality, sensitivity, fraud, and internal control) on the audit scope. Using this information, tailor the audit steps on the -01 working papers to reflect the audit procedures to be applied that are consistent with the unique circumstances at the contractor and the risk factors identified. Each -01 working paper should:</p> <ul style="list-style-type: none"> • Identify audit steps that are not applicable for this examination and the reason the step is not applicable; • Modify applicable existing audit steps to reflect the specific circumstances at the contractor location and the risk factors identified; and • Add audit steps to address the specific circumstances at the contractor location and the risk factors identified 	
<p>17. The team should discuss the results of the risk assessment and reach an agreement on the (i) planned audit scope, including the detailed audit steps (-01 W/Ps) to be performed, (ii) timeframe for completing the audit including the proposed delivery date which will be discussed with the requester and mutually agreed-to, (iii) milestone plan to ensure timely completion of audit, and (iv) zero-based budget. Document and obtain supervisory approval of the risk assessment and the planned scope of examination for each cost element documented in W/P B and -01 W/Ps,</p>	

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18. Contact the requester and verbally discuss the proposed audit report delivery date to arrive at a mutually agreed-to date. If a wide disparity exists between the contracting team deadline and the amount of time the audit team needs to perform the work, the audit team needs to discuss with the requestor this disconnect in expectations immediately. If an agreed-to date cannot be reached, audit teams should elevate the concerns through the chain of command.	
19. Arrange and conduct an entrance conference with the contractor personnel who developed the rates and factors. Confirm the audit team understands how the rates and factors were developed and discuss the availability of required data and personnel necessary to timely support the audit. Communicate a high-level version of the milestone plan with contractor and contracting officer to develop a shared understanding of significant dates and responsibilities (DCAA, ACO, and contractor).	
20. Prepare and send a final acknowledgment memorandum to the requester to communicate our audit scope and the agreed-to date.	
21. Prepare and send a notification letter to the contractor	

Activity Code 23000		Forward Pricing Rate Proposal Audit	
Version 5.0, dated September 2012			
C-01	Testing Reliability of Historical Data		
			WP Reference
<p><i>These steps are applicable when unaudited historical costs are used as the basis of the proposed rates or are used as part of our audit evaluation. In addition, you should qualify the report when you rely on significant unaudited data in your examination.</i></p>			
1. Reconcile historical costs to books and records.			
2. Determine if there are significant variations/outliers in the incurred amounts (by account) for a relevant period of history using trend/comparative analysis.			
3. Perform detailed testing of any significant variations or outliers identified in Step 2 above (See CAM 9-703.5).			
<p><i>Note: The purpose of this test is to determine whether the outliers represent a need to consider an adjustment to the recorded historical cost data used to support the proposed rates</i></p>			
4. Determine if additional procedures need to be performed to provide reasonable assurance that historical cost, used as a basis of estimate or in support of planned audit procedures, is reliable. If so, add those additional procedures to the audit program.			
5. Review and document the performance of real-time audit procedures (including any related follow-up and resolution) performed on			

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historical data supporting projected future costs (i.e. Real-time Labor testing; Real-time Material testing; Indirect Allocation Bases).	
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Version 5.0, dated September 2012		
D-01	Direct Labor Rates (CAM 9-500)	WP Reference
	Considering the understanding of the basis of estimate documented in the risk assessment (W/P B section), perform the following procedures:	
	1. Compare the basis of the proposed direct labor rates to disclosed or established practices and compare proposed rates to actual rates recorded in the contractor’s accounting system to ensure estimated rates are not in greater detail than accumulated (CAS 401/CAS 402/FAR 31.202)	
	2. If average rates are used, determine if the contractor’s method for developing average rates (e.g., weighted by number of employees by pay grade or simple average) is reasonable and direct labor rate categories are homogeneous (CAS 418-50(a)(2)(ii)).	
	3. Compare proposed base year (year 1) labor rates to current payroll data, signed employee agreements, appropriate Wage Determination rates (if applicable) and analyze significant differences, if any.	
	4. Determine if the contractor plans to implement cost savings or cost reduction initiatives (such as pay freezes, plant shutdowns, etc.) and if these are reflected in the forecasted costs.	
	5. Evaluate the proposed labor rates and determine if the contractor considered the impact the following issues may have on the projected rates: <ul style="list-style-type: none"> a. Known or anticipated changes in headcount (hiring/layoffs/turnover) b. Proposed rates for salaried employees reflect total hours worked (including uncompensated overtime). c. Shift differentials and overtime premiums. 	
	6. Evaluate the reasonableness of the proposed escalation/merit increases considering the following: <ul style="list-style-type: none"> a. Independent economic indices (DCAA Pamphlet 7641.74). b. Management approved wage increases/plans or budgets or HR raise information including the timing of granting raises (once a year or continually throughout the year) c. Historical wage increases. d. Union agreements 	
	7. Evaluate the reasonableness of the compensation (FAR 31.205-6). Consider the following in determining reasonableness: <ul style="list-style-type: none"> a. Prior compensation system audits, if applicable b. The contractor’s practices for establishing compensation c. Independent survey data 	

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<p>If required, contact the FAO/Regional point of contact or Mid-Atlantic Compensation Team for guidance and assistance in determining the reasonableness of the proposed labor rates.</p> <p><i>Note: Compensation pursuant to labor-management agreements (bargaining unit employees) will not be tested for reasonableness under FAR 31-205-6(b)(2). See CAM 6-413.1</i></p>	
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Version 5.0, dated September 2012		
E-01	Indirect Rates (CAM 9-700)	
		WP Reference
1. General		
Considering the understanding of the basis of estimate documented in the risk assessment (W/P B section), perform the following procedures:		
a. Compare composition of pools and allocation bases in the proposed FPRP to disclosed or established practices (CAS 401, 402, FAR 31.203(a)).		
b. Verify that the accounting period coincides with the contractor’s fiscal year or historical rate period (CAS 406/FAR 31.203(g)).		
c. Reconcile contractor pool, base, and rate projections with budgetary data or other internal reports (operating budgets, sales forecasts, programs budgets, long range plans, etc.) (CAM 5-500).		
<i>Note: The extent of detail will vary depending on the specific data supporting each year and based on the size and complexity of the contractor.</i>		
2. Indirect Cost Pool Estimates		
Considering the understanding of the basis of estimate documented in the risk assessment (W/P B section), perform the following procedures:		
a. Determine that pool costs are homogeneous (FAR 31.203(c); CAS 418)		
b. Determine the percentage of unallowable costs (and voluntary deletions) in prior year incurred costs audits and unaudited submissions and determine if proposed costs are properly adjusted for historical unallowable/not claimed costs. If not, consider decrementing proposed pool costs for historical unallowable/not claimed costs (FAR Part 31, CAS 405).		

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c. Perform a nomenclature review of overhead cost accounts included in the forecasted pools to identify potentially unallowable accounts (FAR Part 31, CAS 405).	
d. Compare proposed costs by cost element to historical trend data developed in audit step C-1, Step 2 to determine if proposed costs are consistent with historical trends. Identify and test any significant variations/outliers.	
e. Determine if the contractor plans to implement cost savings or reduction initiatives (such as pay freezes, plant shutdowns, etc.) and if these are reflected in the forecasted costs. If not properly reflected in forecasted costs, make adjustments as appropriate	
f. Consider performing a regression analysis to determine reasonableness of forecasted overhead costs (CAM E-403).	
g. Evaluate reasonableness of escalation factors or other adjustments made to out-year pool expenses.	
h. Confirm costs covered by advance agreements are forecasted in accordance with those agreements and that such agreements are still valid for the forecast period.	
i. If applicable, design necessary level of substantive procedures (analytical procedures and/or detailed testing) of additional accounts as determined in the risk assessment. Document those procedures in the “Additional Audit Steps” below.	
3. Indirect Rate Allocation Bases	
Considering the understanding of the basis of estimate documented in the risk assessment (W/P B section), perform the following procedures:	
a. Determine if the allocation base is common to all cost objectives to which the pool is to be allocated and the base selected results in allocation of costs in reasonable proportion to the beneficial or causal relationship of the pooled costs (FAR 31.203(c); CAS 418).	
b. Verify that the allocation base reasonably represents all firm and anticipated (non-firm) business (FAR 31.201-3; FAR 31.201-4). Consider steps such as:	
1) Compare projected costs in the base for backlog contracts to Estimates to Complete used for progress payments or EVMS reporting (including management reserve amounts) for significant programs or contracts.	
2) Contact FLA or major procurement commands to find out if there are significant pending actions that should be included in the forecasted base.	
3) Interview marketing department to ensure prospective new business was considered in the proposed forecast	
4) Compare forecasted costs (labor, material, etc.) for specific contracts or programs to recent proposals	

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F-01	G&A Rate (CAM 9-700)	
		WP Reference
1. General		
Considering the understanding of the basis of estimate documented in the risk assessment (W/P B section), perform the following procedures:		
a. Compare composition of pool and allocation base in the proposed FPRP to disclosed or established practices (CAS 401, 402, FAR 31.203(a)).		
b. Verify that the accounting period coincides with the contractor’s fiscal year or historical rate period (CAS 406/FAR 31.203(g)).		
c. Reconcile contractor pool, base, and rate projections with its budgetary data or other internal reports (operating budgets, sales forecasts, programs budgets, long range plans, etc.) (CAM 5-500).		
2. G&A Cost Pool Estimates		
Considering the understanding of the basis of estimate documented in the risk assessment (W/P B section), perform the following procedures:		
a. Determine that pool costs meet the definition of G&A (FAR 2.101; CAS 410)		
b. Determine the percentage of unallowable costs (and voluntary deletions) in prior year incurred costs audits and unaudited submissions and determine if proposed costs are properly adjusted for historical unallowable/not claimed costs. If not, consider decrementing proposed pool costs for historical unallowable/not claimed costs (FAR Part 31, CAS 405).		
c. Perform a nomenclature review of G&A cost accounts included in the forecasted pools to identify potentially unallowable accounts (FAR Part 31, CAS 405).		
d. Compare proposed costs by cost element to historical trend data developed in audit step C-1, Step 2 to determine if proposed costs are consistent with historical trends. Identify and test any significant variations/outliers.		
e. Determine if the contractor plans to implement cost savings or reduction initiatives (such as pay freezes, plant shutdowns, etc.) and if these are reflected in the forecasted costs. If not properly reflected in forecasted costs, make adjustments as appropriate		
f. Consider performing a regression analysis to determine		

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reasonableness of forecasted pool costs (CAM E-403).	
g. Evaluate reasonableness of escalation factors or other adjustments made to out-year pool expenses.	
h. Confirm costs covered by advance agreements are forecasted in accordance with those agreements and that such agreements are still valid for the forecast period.	
i. If applicable, design necessary level of substantive procedures (analytical procedures and/or detailed testing) of additional accounts as determined in the risk assessment. Document those procedures in the “Additional Audit Steps” below.	
3. G&A Allocation Bases	
Considering the understanding of the basis of estimate documented in the risk assessment (W/P B section), perform the following procedures:	
a. Determine if the allocation base is common to all cost objectives to which the pool is to be allocated, results in allocation of costs in reasonable proportion to the beneficial or causal relationship of the pooled costs, and represents total activity of the business unit (FAR 31.203(c); CAS 410).	
b. Verify the allocation base reasonably represents all firm and anticipated (non-firm) business (FAR 31.201-3). Consider steps such as:	
1) Compare projected costs in the base for backlog contracts to Estimates to Complete used for progress payments or EVMS reporting (including management reserve amounts) for significant programs or contracts.	
2) Contact FLA or major procurement commands to find out if there are significant pending actions that should be included in the forecasted base.	
3) Interview marketing department to ensure prospective new business was considered in the proposed forecast	
4) Compare forecasted costs (labor, material, etc.) for specific contracts or programs to recent proposals	

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G-01	Cost of Money (COM)	WP Reference
Considering the understanding of the basis of estimate documented in the risk assessment (W/P B section), perform the following procedures:		
1. Determine if the proposed COM factors (CAS 414 and CAS 417) are consistent with disclosed/established practices. (CAS 401/CAS 402, FAR 31.201-1)		

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2. Verify that the accounting period coincides with the contractor’s fiscal year or historical rate period (CAS 406/FAR 31.203(g)).	
3. For significant COM pools, compare proposed net book value (NBV) actual NBV in prior year(s) and analyze major variances.	
4. Trace a representative sample of the proposed net book values amounts to the underlying reports and records (capital acquisition plans; asset ledger; etc.).	
5. Verify that the contractor used the correct Treasury Rate (CAS 414; CAM 8-414.1)	
6. Evaluate whether the net book values of the assets are correctly divided between distributed and undistributed. (CAM 8-414.1c(2)).	
7. Determine whether undistributed assets are allocated to the appropriate indirect expense pools on a basis that approximates the actual absorption of depreciation/amortization of the assets (CAS 414; CAM 8-414.1c(2)).	
8. Capital Assets Under Construction:	
a. Determine if any of the contractor's criteria for the measurement of the cost of money is attributable to capital assets under construction, fabrication, or development as an element of the cost of those assets (CAS 417; CAM 417.1(a)).	
b. For significant capital assets being constructed, fabricated, or developed, verify that a representative investment amount is determined each cost accounting period, giving appropriate consideration to the rate at which costs of construction are incurred (CAM 417.1(b)).	
c. Verify that cost of money for assets under construction are not capitalized for any period during which substantially all the activities necessary to get the asset ready for its intended use are discontinued (unless such discontinuance arises out of causes beyond the control and without the fault or negligence of the contractor) (CAM 417.1(c)).	
9. Verify that the allocation bases are compatible with the allocation base used for estimating the proposed indirect rates. (CAS 401, CAS 414, and FAR 31.203(d)).	

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H-01	Other Rates and Factors	WP Reference
<i>Develop audit steps appropriate to the risk and materiality of the other rates and factors proposed in the FPRP considering the understanding of the basis of estimate documented in the risk assessment (W/P B section).</i>		

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Activity Code 23000		Forward Pricing Rate Proposal Audit
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I-01	Corporate Allocations (Audit Procedures at the Segment/Business Unit) (CAM 9-700)	WP Reference
1. General		
Considering the understanding of the basis of estimate and analysis documented in the risk assessment (W/P B section), perform the following procedures:		
a. Compare composition of incoming allocated costs included in the FPRP to disclosed or established practices (CAS 401, 402, FAR 31.203(a)).		
b. Reconcile costs included in the segment proposal to costs included in corporate home office, intermediate home office, shared services, etc., proposal(s) (CAM 5-500). Coordinate with FAO(s) cognizant of the allocated costs to ensure that the segment proposal reflects the most current amounts proposed by the corporate, home office, shared service, etc.		
2. If allocated costs included in the FPRP have been audited by the FAO(s) cognizant of the allocated costs, document and incorporate results of assist audits.		
3. If you determined in the risk assessment that an assist audit is not required, accomplish the additional procedures documented as a result of audit step B.9. in the "Additional Audit Steps" below.		
4. If an assist audit has been requested but not received analyze the applicable costs and determine whether the report can be issued with a qualification to the audit opinion and the allocated costs set out as unresolved or whether the costs are so significant to the overall pool/rate that a disclaimer of opinion is warranted.		

A-01	Concluding Steps	WP Reference
Version 5.0, dated September 2012		
1. Summarize and document the audit results.		
2. The supervisory auditor and appropriate management members of the team should perform a final review of the working papers and audit results.		

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3. After management approval, conduct and document an exit conference with contractor representative(s) in accordance with procedures specified in CAM 4-304.	
4. Draft audit report in accordance with CAM 10-200, 10-300, and any special circumstances that affect the report.	
5. Brief the requestor/contracting officer on significant questioned, unsupported, unresolved costs or other significant and/or complex findings/issues.	
6. Complete the administrative working papers.	
7. If the evaluation disclosed major or recurring cost estimating deficiencies, a report on such deficiencies should be drafted immediately and submitted to the contractor for comment. This procedure will provide for issuing the deficiency report at the same time or shortly after the proposal audit report is issued. (CAM 9-310).	
8. Related CAS noncompliance reports, if any, should be referenced in the audit report, and should be issued generally at the same time as the proposal audit report, if possible. (See CAM 10-806).	
9. Update permanent file.	
10. Based on the recommended forward pricing rates, determine need for revision of billing rates (CAM 9-1206c).	
11. Submit the working paper package and draft report to the supervisor/manager for final review and processing.	

ADEQUACY CHECKLIST FOR FORWARD PRICING RATE PROPOSALS

Contractors that submit cost or price proposals which require the submission of certified cost or pricing data, generally must do so in a format that is consistent with Table 15-2 of Federal Acquisition Regulation (FAR) 15.408 (see FAR 15.403-5). The requirement to submit certified cost or pricing data extends to all cost elements in the proposal, including the underlying direct and indirect rates which may include costs allocated from corporate/home offices or shared services. When the contracting officer determines that entering into a forward pricing rate agreement (FPRA) is beneficial, FAR 42.1701(b) provides that the ACO shall obtain the contractor's forward pricing rate proposal (FPRP) and require that it include cost or pricing data that are accurate, complete, and current as of the date of submission.

If a contractor does not separately provide an FPRP, but instead includes the proposed rates and supporting data in individual cost or price proposals, the contractor is bound by the format/content requirements specified in FAR 15.403-5. The requirements for adequately supported direct and indirect cost rates are not lessened when a contractor separately submits an FPRP for the rates. Therefore, the requirements contained in Table FAR 15-2 of 15.408 extend to FPRPs (including those submitted to support costs allocated from corporate/home offices or shared services) when the resulting rates are expected to be included in proposals that require the submission of cost or pricing data.

A well-supported FPRP reduces contractor effort needed to support an audit and will facilitate the audit and negotiation process. The extent of detail will vary depending on the specific data supporting each year and based on the size and complexity of the contractor. At larger contractors the audit team should expect, at a minimum, the proposed indirect rates for the first year be based on a detailed management-approved operating budget, and each subsequent period be based on adjustments to the operating budget based on strategic or long-range forecasts (e.g., plant expansions, expected business volume, etc.). Generally, the level of forecasted detail will decrease as the period being estimated moves further into the future and the uncertainty of conditions and potential events grows. It is not expected that even the largest contractors prepare detailed operating budgets for each year of contract performance; however, a detailed budget is expected to support the first year of proposed rates.

In order for the Government to perform the appropriate cost analysis under FAR 15.404-1(c) and to provide a timely, adequate, and fair evaluation of the contractor's proposal, the contractor should have available detailed schedules to support the proposed labor and indirect rates. The schedules should include the historical data used and judgmental factors applied to arrive at the proposed rates. The proposal and supporting data should be provided in an electronic format (FAR 15.403-5(b)(3)).

ADEQUACY CHECKLIST FOR FORWARD PRICING RATE PROPOSALS

The audit team should make an initial assessment of adequacy as soon as possible after receipt and before the walkthrough so that corrective action can be taken immediately. The audit team should request a walk-through from the contractor to obtain an understanding of the contractor's submission, estimating methodology, the location of the cost or pricing data the estimator used, and cost/rate monitoring policies and procedures followed. During the walkthrough, the auditor also should discuss with the contractor any items of concern from the initial adequacy assessment. After the walkthrough, the initial adequacy assessment should be revisited based on the understanding obtained.

Most of the criteria in the FPRP Adequacy Checklist are specifically required by the FAR and/or Defense Federal Acquisition Regulation Supplement (DFARS) and are referenced accordingly. The items not referenced to the FAR and/or DFARS are items that will still, in most cases, be needed for negotiations and Government review. Items may be added to the checklist if required by the contracting officer.

The existence or adequacy of some of the supporting data can be determined only by discussing it with the contractor during the walk-through or during the course of a detailed audit. **Therefore, it is possible that an initial finding of adequacy may be changed once the audit has started.**

ADEQUACY CHECKLIST FOR
FORWARD PRICING RATE PROPOSALS

	Adequate?			Comment
	Yes	No	NA	
<u>General Requirements</u>				
1. Is there a properly completed first page of the proposal or a summary format as specified by the contracting officer (FAR 15.408, Table 15-2 I., <i>General Instructions, A.</i>)?				
2. Does the submission include a table of contents (index) identifying and referencing all supporting data accompanying or identified in the proposal? NOTE: Supporting documentation for all costs should be provided with the submission or be readily available. If not provided with the submission, the basis of estimate should include the location of the documentation and the point of contact (custodian) name, phone number, and email address (FAR 15.408 Table 15-2 I., <i>General Instructions, B.</i> ; DFARS 252.215-7002(d)(4)(iv)).				
3. If the submission is a revision/update to the forward pricing rates for the year, has the contractor explained the reasons for the update and identified the changes between the original submission for the year and the new revision/update (FAR 15.408 Table 15-2 I., <i>General Instructions, B.</i> ; DFARS 252-215.-7002(d)(4)(iv))?				
4. Is the proposal mathematically correct and does it reconcile to the supporting data referenced? (FAR 15.408 Table 15-2 I., <i>General Instructions, C.</i> (2)(i))				

ADEQUACY CHECKLIST FOR
FORWARD PRICING RATE PROPOSALS

	Adequate?			Comment
	Yes	No	NA	
5. Is the proposal internally consistent (for example, is the direct labor base used for labor overhead consistent with direct labor in the G&A allocation base)? (FAR 15.408, Table 15-2 I., <i>General Instructions</i> , D				
6. Do proposed costs based on judgmental factors include an explanation of the estimating processes and methods used, including those used in projecting from known data (FAR 15.408 Table 15-2 I., <i>General Instructions</i> , C.(2)(i); DFARS 252.215-7002(d)(4)(iv))?				
7. Did the contractor provide trend and budgetary data (FAR 15.408, Table 15-2 II., <i>Cost Elements</i> , C., <i>Indirect Costs</i> ; DFARS 252.215-7002(d)(4)(ix) and (x))?				
8. If trend and budgetary data was used as the basis for the forecasted rates, did the contractor include an adequate explanation of how the data was used, including any adjustments to the data (FAR 15.408, Table 15-2 II., <i>Cost Elements</i> , C, <i>Indirect Costs</i> ; DFARS 252.215-7002(d)(4)(iv))?				
9. Does the submission include a comparison of prior forecasted costs to actual results in the same format as the submission and an explanation/analysis of any differences (DFARS 252.215-7002(d)(4)(xiii))?				

ADEQUACY CHECKLIST FOR
FORWARD PRICING RATE PROPOSALS

	Adequate?			Comment
	Yes	No	NA	
<p>10. Did the contractor disclose known or anticipated changes in business activities or processes that could materially impact the costs (if not previously provided)? For example:</p> <ul style="list-style-type: none"> a. management initiatives to reduce costs; b. changes in management objectives as a result of economic conditions and increased competitiveness; c. changes in accounting policies, procedures, and practices including: (i) reclassification of expenses from direct to indirect or vice versa, (ii) new methods of accumulating and allocating indirect costs and the related impact and (iii) Advance Agreements; d. company reorganizations (including acquisitions or divestitures); e. shutdown of facilities; and f. changes in business volume and/or contract mix/type. 				
<u>Direct Labor Rates</u>				
<p>11. Did the contractor identify the basis of estimate, including an explanation of the methodology used to develop the direct labor rates (FAR 15.408, Table 15-2, II. <i>Cost Elements</i>, B; DFARS 252.215-7002(d)(4)(iv))?</p>				

ADEQUACY CHECKLIST FOR
FORWARD PRICING RATE PROPOSALS

	Adequate?			Comment
	Yes	No	NA	
12. Did the contractor include or identify the location of the supporting documents for the base-year labor rates (e.g., payroll records) (FAR 15.408, Table 15-2, II. <i>Cost Elements</i> , B)?				
13. Did the contractor identify escalation factors for the out years, the costs to which escalation is applicable, and the basis of the factors used (FAR 15.408 Table 15-2 I., <i>General Instructions</i> , C.(2)(i); DFARS252.215-7002(d)(4)(iv))?				
14. Did the contractor identify planned or anticipated changes in the composition of labor rates, labor categories, union agreements, headcounts, or other factors that could significantly impact the direct labor rates (FAR 15.407-1)?				
<u>Indirect Rates (Fringe, Overhead, G&A, etc.)</u>				
15. Did the contractor identify the basis of estimate, including an explanation of the methodology used to develop the indirect rates (FAR 15.408, Table 15-2, II. <i>Cost Elements</i> , C.; DFARS 252.215-7002(d)(4)(iv))?				
16. Did the contractor include or identify the location of the supporting documents for the proposed rates (FAR 15.408, Table 15-2, II. <i>Cost Elements</i> , C.; DFARS 252.215-7002(d)(4)(iv))?				

ADEQUACY CHECKLIST FOR
FORWARD PRICING RATE PROPOSALS

	Adequate?			Comment
	Yes	No	NA	
17. Did the contractor identify indirect expenses by burden center, by cost element, by year (including any voluntary deletions, if applicable) in a format that is consistent with the accounting system used to accumulate actual expenses (FAR 15.408 Table 15-2 I., <i>General Instructions</i> , D.)?				
18. Did the contractor identify significant contingencies (FAR 15.408 Table 15-2 I., <i>General Instructions</i> , C.(2)(ii))?				
19. Did the contractor identify planned or anticipated changes in the nature, type or level of indirect costs, including fringe benefits (FAR 15.407-1)?				
20. Did the contractor identify corporate, home office, shared services, or other incoming allocated costs and the source for those costs, including location and point of contact (custodian) name, phone number, and email address (DFARS 252.215-7002(d)(4)(iv))?				
21. Did the contractor separately identify all intermediate cost pools and provide a reconciliation to show where the costs were allocated (FAR 15.408 Table 15-2 II., <i>Cost Elements</i> , C.; DFARS 252.215-7002(d)(4) (iv))?				
22. Did the contractor identify the escalation factors for the out years, the costs to which escalation is applicable, and the basis of the factors used (FAR 15.408 Table 15-2 I., <i>General Instructions</i> , C.(2)(i); DFARS 252.215-7002(d)(4)(iv))?				

ADEQUACY CHECKLIST FOR
FORWARD PRICING RATE PROPOSALS

	Adequate?			Comment
	Yes	No	NA	
23. Did the contractor provide appropriate detail of the allocation base (DFARS 252.215-7002(d)(4) (iv))?				
24. Did the contractor include or reference the supporting data for the allocation base such as program budgets, negotiation memorandums, proposals, contract values, etc. (DFARS 252.215-7002(d)(4)(xi))?				
25. Did the contractor identify how the proposal reconciles with its long range plans, strategic plan, operating budgets, sales forecasts, program budgets, etc. (DFARS 252.215-7002(d)(4)(xi))				
<u>Cost of Money (COM)</u>				
26. Were Cost of Money rates submitted on Form CASB-CMF (FAR 15.408, Table 15-2, II. <i>Cost Elements</i> , F)?				
27. Did the contractor provide a summary of the net book value of assets, identified as distributed and non-distributed?				
28. Did the contractor identify the underlying reports and records to support the net book value of assets (DFARS 252.215-7002(d)(4)(iv))?				
29. Did the contractor identify the Treasury Rate used to compute the facilities capital cost of money?				

**ADEQUACY CHECKLIST FOR
FORWARD PRICING RATE PROPOSALS**

OVERALL ASSESSMENT OF ADEQUACY:

Complete this section after the walkthrough. More than one “No” response above does not necessarily make the proposal inadequate. The audit team needs to assess materiality, sensitivity, and significance of the proposal inadequacies in reaching an overall assessment on the adequacy of the submission.

ADEQUATE

INADEQUATE

ADDITIONAL COMMENTS <i>(Provide additional comments as needed to document the audit team's assessment of proposal adequacy)</i>

The audit team should discuss identified inadequacies with the contractor and contracting officer during the proposal walk-through to ensure a full understanding of all relevant facts. If the proposal is so deficient that an examination cannot be performed, recommend to the requestor that the proposal be returned to the contractor without audit until an adequate proposal is received. The audit team should provide the contracting officer a written summary of the inadequacies in sufficient detail to allow the contracting officer and the contractor to understand the inadequacies and take appropriate corrective action(s). In addition, for any significant deficiencies, the FAO should consider issuing a flash estimating system deficiency report.