

Master Document – Audit Program

Activity Code 13010	Accounting and Control of Labor Cost
Version 9.4, dated November 2009	
B-1	Planning Considerations
Purpose and Scope	
The major objectives of this audit are to:	
<ul style="list-style-type: none"> • Evaluate the adequacy of and the contractor’s compliance with the labor system internal controls. 	
<ul style="list-style-type: none"> • Obtain a sufficient understanding of the contractor’s labor system and related internal controls (including both manual and computerized activities) to plan related audit effort. This requires that the auditor assess the adequacy of the contractor’s policies and procedures, whether they have been implemented, and if they are working and being monitored effectively. 	
<ul style="list-style-type: none"> • Document the understanding of the labor system internal controls in working papers and permanent files. 	
<ul style="list-style-type: none"> • Assess control risk as a basis to identify factors relevant to the design of substantive tests. 	
<ul style="list-style-type: none"> • Report on the understanding of the labor system internal controls and assessment of control risk, and the adequacy of the system for Government contracts. 	
<p>This audit is limited to the examination of the labor system and related internal controls for major contractors, non-major contractors where the system is considered significant and other contractors with substantial firm-fixed price contracts. Only those controls directly related to the contractor’s labor system, as defined below, will be audited under this assignment. Controls for interrelated audit concerns regarding the adequacy of the contractor’s other major systems (i.e., budget and planning, estimating, etc.) will be audited under separate assignments. While the controls for these areas are not part of this audit, the results of all audits of these interrelated controls must be considered in forming an overall audit conclusion on the labor system internal controls. The results of this audit should be commented on in reports on related audit areas.</p>	
<p>When performing an update or follow-up examination, the audit steps below should be adjusted and tailored accordingly. To the extent possible, prior audit effort should be used as a basis for validating the contractor’s internal controls.</p>	
<p>Before beginning this examination, the auditor should be alert for internal control evaluations performed by the contractor or its external auditors relating to this audit area. In those cases where internal control evaluations have been performed, the auditor should follow guidance contained in CAM 4-1000, Relying Upon the Work of Others.</p>	
<p>Before performing any examination of internal controls, the auditor should determine that the system contemplated for examination is material to the Government. Once it is determined that the system is material to the Government, the auditor should reassess the materiality of each</p>	

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<p>section in the internal control audit before performing any audit steps in that section. The scope of any audit depends on individual circumstances. The auditor is expected to exercise professional judgment, considering vulnerability and materiality, in deciding the scope of audit to be performed.</p>
<p>The use of computers of all kinds in a contractor’s accounting and management systems is so pervasive it is unlikely that any audit of them could be performed adequately without an examination of the internal controls over their automated aspects. Therefore, the auditor should become familiar with guidance contained in the Information Systems (IS) Auditing Knowledge Base that is found on DCAA’s Intranet, prior to the beginning of this audit. In addition, in some instances, the assistance of IT specialists may be required to adequately evaluate the automated aspects of the internal controls. In these cases, auditors should coordinate, through their supervisory auditor, to contact their regional offices to obtain the necessary expertise.</p>
<p>The internal control matrix (see Internal Control Matrix-Accounting and Control of Labor Cost) shows the interrelationships among the example control objectives, control activities, and audit procedures used in this audit program. The control objectives and the audit procedures have been fully integrated into this audit; therefore, the matrix is not needed unless it is desirable to see the associated example control activities and the interrelationships in a matrix format.</p>
<p>In cases where this examination covers internal control systems at multi-segment contractors, follow the guidance in CAM 5-103.2 and 5-110e. Auditing internal controls at multi-segment contractors requires effective coordination among cognizant auditors to identify the audit responsibilities at each location to ensure appropriate audit coverage when contractor locations share components of an internal control system, such as policies and procedures, common technologies (e.g., software) or common management. FAOs cognizant of segment locations should initiate assist audits from off-site locations as necessary. FAOs cognizant of off-site locations should not self-initiate audits of internal controls.</p>
<p>References</p> <ul style="list-style-type: none"> • CAM 3-300, Internal Control Audit Planning Summary (ICAPS) • CAM 5-100, Obtaining an Understanding of a Contractor’s Internal Controls and Assessing Control Risk • CAM 5-900, Audit of Labor System Internal Controls • CAM 6-404, Evaluation of Labor Cost Charging and Allocation • CAM 6-405, Observations of Work Areas (Floor Checks) Procedures

B-1	Preliminary Steps	W/P Reference
Version 9.4, dated November 2009		
1. Research and Planning		

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a. Become familiar with applicable sections of CAM 5-900. Any recent relevant Headquarters guidance (i.e., MRDs, AGMs, and AMGMs) not incorporated in the CAM can be accessed from the Agency-Wide Library available on the DCAA’s intranet home page.	
b. Perform the following steps using the permanent file:	
(1) Review the prior labor system audit working paper package.	
(2) Identify any labor system deficiency reports issued (review ICRS database, as applicable). Document the results of (1) and (2) on W/P B-2.	
(3) Determine if there are any reported deficiencies in the other internal control system audits that impact the scope of this labor system audit (review ICRS database, as applicable). Document on W/P B-2. The results of the Control Environment and Overall Accounting Controls examination, if any, should also be evaluated and documented, in detail, under Control Environment, Section C-1, Step 1 of the W/Ps and under Information and Communications, Section E-1, Step 1. The results of the IT Systems General Internal Controls examination, if any, should also be evaluated and documented in detail under Information and Communications, Section E-1, Step 1.	
(4) Identify the sources for the detailed policies, procedures, charts, etc., called for in steps (a) through (d) below. Document the sources of data by listing the data, its source, and any changes since the last system audit.	
(a) Contractor’s written policies and procedures and labor system manual.	
(b) Organization charts depicting the functional areas responsible for developing and processing of labor related data.	
(c) Labor charging and distribution system flowcharts providing a pictorial overview of all manual and computerized processing steps.	
(d) Information systems documentation:	
(i) Pertinent record layouts of files created and/or used during the processing of labor related transactions.	
(ii) Database table definitions.	
(iii) Source documents.	

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(iv) Information on the conversion of documents to computer media.	
(v) Subsidiary or master files affected by the system.	
(vi) Relevant reports, journals, and ledgers produced in the flow of information to the labor reports.	
(5) Review audit lead sheets.	
(6) Review other related audits (e.g., 13500-Major Contractor Labor Floorchecks/Interviews, 10310-Nonmajor Contractor Labor Floorchecks).	
<p>c. In planning and performing the examination, consider the fraud indicators specific to the audit. The principal sources for the applicable fraud risk indicators are:</p> <ul style="list-style-type: none"> • Handbook on Fraud Indicators for Contract Auditors, Section II.1 (IGDH 7600.3, APO March 31, 1993) located at http://www.dodig.mil/PUBS/igdh7600.doc (To access the handbook, copy and paste the web address shown above into the address block in Internet Explorer.) • CAM Figure 4-7-3 and CAM 6-404.6. <p>Document in working paper B any identified fraud risk indicators and your response/actions to the identified risks (either individually, or in combination). This should be done at the planning stage of the audit as well as during the audit if risk indicators are disclosed. If no risk indicators are identified, document this in working paper B.</p>	
<p>d. Obtain from the contractor a schedule of total dollars processed through the labor system for the past twelve months (or most recently completed fiscal year) and summarize by total dollars and dollars by Government flexibly priced contracts and fixed price contracts in order to determine the materiality of the labor system. Complete the Materiality section of the ICAPS form at W/P A. (MAAR 1)</p>	
<p>e. Discuss the planned examination of the labor system internal controls with the administrative contracting officer (ACO) and the contractor's major procurement activities to identify, understand, and document any concerns they may have of areas which should be evaluated.</p>	
<p>f. FAOs that have cognizance of contractors with significant classified contracts should coordinate with the Field Detachment to determine the DCAA office responsible for identifying and reviewing labor on classified contracts. This coordination should</p>	

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<p>be documented in the working papers. FAOs should also coordinate with the Field Detachment on any significant labor system issues found on classified contracts during prior period reviews.</p>	
<p>g. Close coordination is required at FAOs cognizant of a shared services location and the FAOs cognizant of the segments serviced by the shared services. Document the objectives and procedures to be performed at the shared services location and the segment level. Request assist audits, as applicable.</p>	
<p>h. Determine the extent and results of the contractor’s self-governance activities, internal and external audits, and coordinated audits related to the labor system.</p>	
<p>(1) Request the contractor provide a list of completed internal and external audits and determine if any are related to the labor system.</p>	
<p>(2) If applicable, coordinate with the CAC or corporate office auditors to determine if any internal control weaknesses that might impact the labor system were identified in management’s internal control report or the independent auditor’s attestation on management’s assertion included in the annual report filed with the SEC.</p>	
<p>(3) In those cases where internal or external audits have been performed, the auditor should follow the guidance contained in CAM 4-1000, Relying Upon the Work of Others. Document your preliminary evaluation and its impact on the scope of this examination. The evaluation of internal audit working papers is documented in detail under Management Reviews in Section G-1, step 3.</p>	
<p>i. Determine the need for technical assistance/assist audits, if any, and document your consideration on working paper B-3.</p>	
<p>2. Entrance Conference and Preparation</p>	
<p>a. Prepare a written memorandum to the contractor to arrange for an entrance conference, covering the areas highlighted in CAM 4-302 and any specific data or pertinent information not yet provided.</p>	
<p>b. Conduct an entrance conference as outlined in CAM 4-302, with particular emphasis on:</p>	
<p>(1) Requesting the contractor to provide, if applicable, a system orientation briefing or a demonstration of the labor system transaction flow including data input, data processing, data</p>	

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output, and related internal controls. Document under Information and Communications, Section E-1 Step 3.	
(2) Determining any changes in the labor processing job stream since the last examination.	
(3) Discussing the contractor’s risk assessment process. The overall understanding of the contractor’s process will be documented under Contractor Risk Assessment, Section D-1.	
(4) Discussing the contractor’s monitoring process to ensure that established manual and computerized controls are functioning as intended. Document under Monitoring, Section F-1.	
(5) Discussing any identified weaknesses which may have been previously reported and related follow-up actions taken.	
3. Other Preliminary Steps	
a. Determine the degree a computerized system is used in the labor system process.	
b. Perform a high level cursory assessment to determine if the following exist:	
(1) A functional labor organization with defined organizational responsibilities.	
(2) A written description of the work flow in the labor process.	
(3) Policies and procedures for effectively controlling the process.	
4. Initial Risk Assessment	
Using the information obtained in steps 1, 2, and 3, prepare an initial risk assessment to determine the initial scope of the examination (W/P B).	

C-1	Control Environment	W/P Reference
Version 9.4, dated November 2009		
The control environment sets the tone of an organization, influencing the control consciousness of its people. It is the foundation for all other components of internal control, providing discipline and structure. The		

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auditor should obtain a sufficient understanding of the control environment to determine the impact that it may have on the overall effectiveness of the labor system internal controls.	
1. Evaluate the most recently completed ICAPS for the Control Environment and Overall Accounting Controls for the rationale behind any moderate or high-risk assessment ratings and determine the impact, if any, on the effectiveness of the labor system internal controls on the control environment. (MAAR 1)	
2. If an examination of the control environment has not been recently performed, evaluate all documented prior audit experience with the contractor, including permanent files, relevant audit reports and working papers, suspected irregular conduct (SIC) referrals and discussions with prior auditors. Obtain an understanding of the following factors:	
a. Integrity and ethical values.	
b. Commitment to competence.	
c. Board of directors and/or audit committee participation.	
d. Management’s philosophy and operating style.	
e. Organizational structure.	
f. Assignment of authority and responsibility.	
g. Human resource policies and procedures.	
h. Financial capability.	
3. Document your overall understanding of the control environment and the impact that it has on the nature and extent of testing of each control objective (W/Ps G, H, I, J, K, L, M and N).	

D-1	Contractor Risk Assessment	W/P Reference
	Version 9.4, dated November 2009	
	The auditor should develop a sufficient understanding of the risk assessment process currently employed by the contractor in terms of its identification, analysis, and management of risks relevant to the accumulation and recording of labor costs.	
	1. Meet with responsible personnel to obtain an overview of the various risk factors considered by management.	
	2. Once the various risk factors are identified, obtain an understanding of how management identifies the risks; estimates the significance of risks; assesses the likelihood of their occurrence; and relates them to	

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contract reporting.	
3. If applicable, obtain an overview of any plans, programs, or actions management may initiate to address specific risks. Keep in mind that, depending on the nature of specific risks, management may elect to accept a given risk due to costs or other considerations.	
4. Document your overall understanding of the contractor’s risk assessment practices and the impact that it has on the nature and extent of testing of each control objective (W/Ps G, H, I, J, K, L, M and N).	

E-1	Information and Communications	W/P Reference
Version 9.4, dated November 2009		
Information and communication processes consist of the methods and records established to record, process, summarize, and report contract cost data. The auditor should develop a sufficient understanding of the contractor’s information and communication processes (relevant to contract cost data) to identify significant classes of transactions and how they are initiated, processed, controlled, and reported. A necessary step in understanding the information and communication process is to trace selected transactions through the system (see Step 5 below). This will assist in validating the contractor’s demonstration of the system and identifying key controls requiring subsequent testing.		
1.	Since the accounting and information systems are integral components of information and communication processes, evaluate the most recently completed ICAPS for the Control Environment and Overall Accounting Controls and the IT Systems General Internal Controls for the rationale behind any moderate or high-risk assessment ratings and determine the potential impact, if any, on the effectiveness of the labor system internal controls on information and communications.	
2.	Evaluate relevant permanent files, prior audit working papers, and any prior contractor demonstrations of its labor system information and communication processes.	
3.	Determine if the contractor has made changes to the information and communication processes in its labor system since the last demonstration. Evaluate the changes. If no prior systems demonstration was performed, have the contractor provide one. Contractor representatives providing the demonstration should possess a detailed knowledge of the labor system. The demonstration provides the auditor an opportunity to query contractor personnel regarding internal controls and how they are monitored. The auditor should ensure that the demonstration addresses the internal control objectives	

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outlined in CAM 5-900.	
<p>4. The contractor should include appropriate manual and computerized controls in its information processing that check for accuracy, completeness, and proper authorization of labor related transactions. Have the contractor identify and demonstrate controls related to each of the areas listed in a. through e. below. Compare the contractor disclosed controls with the generic access control listing contained in the referenced CAM section and identify any controls not incorporated in the application. Verify the existence and adequacy of the contractor disclosed controls. Discuss any apparent deficiencies with the contractor.</p>	
a. Access Controls (CAM 5-1406.1)	
b. Data Input Controls (CAM 5-1406.2)	
c. Processing Controls (CAM 5-1406.3)	
d. Error Correction and Submission (CAM 5-1406.4)	
e. Output Controls (CAM 5-1406.5)	
<p>5. Once the current labor system information and communication processes are demonstrated by the contractor, trace selected labor transactions through the labor system starting from the initiation of the transactions (e.g., work authorization) to validate your understanding of the labor system. By tracing a transaction, the auditor should document the validity and operation of the key controls demonstrated by the contractor in steps 2-4 above (e.g., controls over work authorizations, timekeeping controls, reconciliation of timekeeping to labor distribution to payroll, authorization of labor transfers). Discrepancies between your understanding and the contractor’s demonstration should be resolved prior to completing the remainder of this examination.</p>	
<p>6. Document your confirmed understanding of the contractor’s labor system information and communication processes and obtain a written confirmation from the contractor indicating that they agree with this understanding. This documentation will typically take the form of system flowcharts or narrative descriptions and can be prepared by the auditor or consist of documentation prepared by the contractor (see CAM 5-106). Based on your understanding of the contractor’s labor system information and communication processes, document the impact that it will have on the nature and extent of testing of each control objective (W/Ps G, H, I, J, K, L, M and N).</p>	

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F-1	Monitoring	W/P Reference
Version 9.4, dated November 2009		
<p>Monitoring is a process that assesses the quality of internal control performance over time. It involves assessing the design and operation of controls on a timely basis and taking necessary corrective actions. The auditor should develop a sufficient understanding of the contractor’s ongoing monitoring activities and/or separate evaluations related to the labor system internal controls.</p>		
<p>1. Determine if ongoing monitoring procedures are incorporated into the normal recurring activities of the contractor’s organization. These procedures should include regular management and supervisory activities.</p>		
<p>2. Where applicable, determine the extent of internal audit involvement in performing monitoring functions through separate evaluations.</p>		
<p>3. Determine and document the extent of monitoring activities being performed by external parties.</p>		
<p>4. Document your overall understanding of the monitoring activity being performed at the contractor’s location and the impact it will have on the nature and extent of testing of each of the control objectives (W/Ps G, H, I, J, K, L, M and N).</p>		

G-1	Management Reviews	W/P Reference
Version 9.4, dated November 2009		
<p>The auditor should obtain an understanding of the contractor's control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Labor system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.</p>		
<p>1. In planning the following audit procedures to understand the contractor’s control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control</p>		

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objective. Internal control components are as follows:	
• Control environment	
• Contractor risk assessment	
• Information and communications	
• Monitoring	
2. Verify that periodic reviews of the contractor’s labor system policies and procedures are conducted to ensure that:	
a. Policies and procedures are compliant with applicable Federal regulations and contract terms.	
b. Policies and procedures have been implemented and are working effectively.	
c. Follow-up actions are taken on recommendations resulting from management reviews.	
3. Evaluate the contractor’s record of completed internal audits and its current internal audit plan to determine if the labor system is being subjected to periodic reviews in accordance with established policies and procedures.	
4. Identify and selectively evaluate documentary evidence and the frequency of the contractor's management reviews to determine whether the scope of such reviews are appropriate, the conclusions sound, and appropriate follow-up actions were taken.	
5. Identify any reviews which may have an impact on this examination, and evaluate the reports and supporting working papers to determine if any system deficiencies were noted, and the extent to which we can rely on the work performed (see CAM 4-1000).	

H-1	Employee Awareness Training	W/P Reference
Version 9.4, dated November 2009		
The auditor should obtain an understanding of the contractor's control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Labor system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be		

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performed, and control risk will be assessed as high.	
1. In planning the following audit procedures to understand the contractor’s control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control objective. Internal control components are as follows:	
<ul style="list-style-type: none"> • Control environment 	
<ul style="list-style-type: none"> • Contractor risk assessment 	
<ul style="list-style-type: none"> • Information and communications 	
<ul style="list-style-type: none"> • Monitoring 	
2. Determine whether the policies and procedures require formal company-wide timekeeping and labor charging training that has the characteristics described in CAM 5-907 and requires formal documentation of employee attendance.	
3. On a test basis, evaluate the contractor’s employee sign-in logs, memoranda recording attendance, agenda, etc., to verify that training has occurred.	

I-1	Labor Authorization – Approvals	W/P Reference
Version 9.4, dated November 2009		
The auditor should obtain an understanding of the contractor's control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Labor system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.		
1. In planning the following audit procedures to understand the contractor’s control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control objective. Internal control components are as follows:		

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<ul style="list-style-type: none"> • Control environment 	
<ul style="list-style-type: none"> • Contractor risk assessment 	
<ul style="list-style-type: none"> • Information and communication 	
<ul style="list-style-type: none"> • Monitoring 	
<p>2. Determine if the policies and organizational structure provide for adequate control over work authorizations, and require authorizations to be issued independently of those performing the work, to assure the integrity of labor recording procedures. Particular attention should be given to the procedures used to control the opening and closing of work authorizations.</p>	
<p>3. Select a random sample of work authorizations to determine who initiated the documents. Compare these authorizations to the organizational chart to verify separation of duties.</p>	
<p>4. Determine if policies require detailed descriptions of the work to be performed.</p>	
<p>5. In conjunction with your evaluation of “Labor Cost Accounting” (Section L-1), request the purchase orders, contracts, etc., for the work authorizations selected in step 3, above. Verify that the description on the work authorization clearly relates to the item(s) required on the originating document(s).</p>	

J-1	Timekeeping – Manual or Automated Systems	W/P Reference
Version 9.4, dated November 2009		
<p>The auditor should obtain an understanding of the contractor's control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Labor system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.</p>		
<p>1. In planning the following audit procedures to understand the contractor’s control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control</p>		

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objective. Internal control components are as follows:	
<ul style="list-style-type: none"> • Control environment 	
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<ul style="list-style-type: none"> • Information and communication 	
<ul style="list-style-type: none"> • Monitoring 	
2. Determine if the contractor’s policies and procedures are adequate to maintain the integrity of the timekeeping system.	
3. In conjunction with your evaluation of “Labor Distribution” (Section K-1), select a random sample of employees for floorchecks, verifying that the established timekeeping procedures are being followed.	
Note: To the extent possible, the auditor should rely on work performed under MAAR 6.	

K-1	Labor Distribution	W/P Reference
Version 9.4, dated November 2009		
The auditor should obtain an understanding of the contractor's control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Labor system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.		
1. In planning the following audit procedures to understand the contractor’s control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control objective. Internal control components are as follows:		
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2. Determine if policies and procedures require that hours recorded in the timekeeping system are reconciled, either manually or automatically as part of normal IT operations, with attendance records and labor distribution summaries.	
3. Verify that the contractor performs reconciliations of timekeeping records to attendance records and labor distribution summaries. If these reconciliations are performed as part of the IT operations, the auditor should document in the w/ps and design appropriate tests to verify the effectiveness of the computerized procedures. (MAAR 9)	
4. Determine if procedures exist for equitable recording of uncompensated overtime, see CAM 6-410, “Evaluation of Uncompensated Overtime.”	
5. Determine if procedures require that direct and indirect labor charges be supported by sufficient evidential matter to verify the allocability to final cost objectives, and that labor charges are traceable to approved work authorizations.	
6. Concurrently with your evaluation of “Timekeeping – Manual or Automated” (Section J-1), request the work authorizations for the labor charges sampled to verify that the charges are valid and traceable to final cost objectives.	

L-1	Labor Cost Accounting	W/P Reference
Version 9.4, dated November 2009		
<p>The auditor should obtain an understanding of the contractor's control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Labor system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.</p>		
1.	<p>In planning the following audit procedures to understand the contractor’s control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control objective. Internal control components are as follows:</p>	

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<ul style="list-style-type: none"> • Monitoring 	
2. Evaluate the procedures to determine if they address comparative analysis of sensitive accounts. Procedures should also address changes in labor charging practices to assure consistency with CAS. (MAAR 8)	
3. Request the contractor’s documentation of its review of sensitive accounts to verify compliance and to identify any areas that require further analysis. (MAAR 8)	
4. Determine if policies require the briefing of contracts for relevant contract terms and conditions impacting labor.	
5. In conjunction with your evaluation of “Labor Authorization - Approvals” (Section I-1), request contractor briefing documents or contracts impacting overtime, skill mix, etc. Obtain a random sample of payroll/personnel records to evaluate compliance with contract terms.	
6. Determine that policies require the identification and segregation of unallowable direct and indirect labor costs.	
7. Verify that the chart of accounts and the contractor’s disclosure statement identify and describe the treatment of unallowable direct and indirect labor costs.	
8. Determine if policies require that lump-sum wages resulting from union contracts be amortized, if applicable (see CAM 7-2119).	
9. If applicable, request an amortization schedule from the contractor and evaluate for compliance with the requirements outlined in CAM 7-2119.	
10. Determine if policies regarding overtime authorization and the allocability of overtime premiums address the concerns in CAM 6-409.	
11. On a test basis, evaluate documentation supporting the authorization of overtime to determine that the contractor is in compliance with FAR 22.103, where applicable.	
12. Determine if adequate policies exist for the retention of records, as outlined in FAR 4.705-1.	

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M-1	Payroll Preparation and Payment	W/P Reference
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<p>The auditor should obtain an understanding of the contractor's control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Labor system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.</p>		
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<ul style="list-style-type: none"> • Information and communication 		
<ul style="list-style-type: none"> • Monitoring 		
<p>2. Evaluate current organizational charts, job descriptions, etc., to determine if there is a sufficient division of duties between personnel responsible for the preparation of time and attendance records, and those responsible for the preparation and distribution of the payroll.</p>		
<p>3. Ascertain whether procedures require that the pay rates in effect be supported by written authorization from the personnel department or other authorized source.</p>		
<p>4. On a test basis, verify that pay rates are officially authorized.</p>		
<p>5. Determine if procedures require cross-checks, either manual or computerized, within the payroll department for verifying the accuracy of names, rates of pay, hours worked, extensions, and accounting distributions.</p>		
<p>6. Verify that the contractor performs the required crosschecks in accordance with established procedures by analyzing evidentiary documentation. If these crosschecks are computerized, the auditor should document the w/ps and design appropriate tests to verify the effectiveness of the computerized procedures.</p>		

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N-1	Labor Transfers and Adjustments	W/P Reference
Version 9.4, dated November 2009		
<p>The auditor should obtain an understanding of the contractor's control activities for this control objective. A detailed understanding of the control activities is essential to the assessment of control risk. Labor system primary control objectives, as they relate to U.S. Government contracts, and examples of control activities the contractor may have implemented to achieve the control objectives, are provided in the internal control matrix (see W/P 31). The audit procedures for this control objective are also included in the internal control matrix. If the auditor determines that relevant internal control activities do not exist, or that the effort to perform tests is not justified, no control testing need be performed, and control risk will be assessed as high.</p>		
<p>1. In planning the following audit procedures to understand the contractor's control activities, the auditor should recognize the other components of internal control and their impact on the nature and extent of testing to be performed. Document the impact of the internal control components on the nature and extent of testing on this control objective. Internal control components are as follows:</p>		
<ul style="list-style-type: none"> • Control environment 		
<ul style="list-style-type: none"> • Contract risk assessment 		
<ul style="list-style-type: none"> • Information and communications 		
<ul style="list-style-type: none"> • Monitoring 		
<p>2. Determine that policies and procedures exist for approving and reviewing labor transfers, and that a relevant written explanation is required for the transfer.</p>		
<p>Note: Particular attention should be given to systems that allow for “on-line” adjustments. In these cases, the auditor should determine that controls are in place to ensure that unauthorized or undocumented adjustments are prevented or detected in a timely manner.</p>		
<p>3. On a test basis, verify the contractor's compliance with established procedures for labor transfers by evaluating evidentiary documentation.</p>		
<p>4. Determine if policies require that labor charging errors be suspended until evaluated, officially authorized, and corrected.</p>		
<p>5. On a test basis, verify the contractor's compliance with established procedures for correction of labor charging errors by analyzing</p>		

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evidentiary documentation.	
Note: To the extent possible, the auditor should rely on work performed under MAAR 10.	

A-1	Concluding Steps	W/P Reference
Version 9.4, dated November 2009		
1. Assessment of Control Risk		
	a. Considering all five components of internal control (control environment, contractor risk assessment, information and communications, monitoring and control activities that relate to control objectives), assess control risk for each of the relevant control objectives (management reviews, employee awareness training, labor authorizations, timekeeping, labor distribution, labor cost accounting, payroll preparation and payment, and labor transfers and adjustments). For each of the objectives, summarize the characteristics which support the assessed level of control risk and specifically identify any internal control weaknesses or system deficiencies.	
	b. Determine if the labor system is adequate to reasonably assure proper pricing, administration, and settlement of Government contracts in accordance with applicable laws and regulations.	
	c. Based on the assessments above, determine the impact on the scope of other audits.	
	d. Complete the ICAPS form at W/P A (see CAM 3-305) (MAAR 1)	
	e. Coordinate the results of audit with the supervisor. The supervisor and the FAO manager should review and initial the ICAPS before the exit conference is performed. If it is determined that additional audit steps are needed, any additional planned audit effort should be accomplished as part of this examination or immediately thereafter. Any delays in completion of this audit effort should be documented and approved by management.	
2. Summary Steps		
	a. Prepare a draft audit report in accordance with CAM 10-400.	
	b. Conduct an exit conference with the contractor in accordance with	

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CAM 4-304.	
c. Finalize the audit report incorporating the contractor's response and audit rejoinder.	
d. If the contractor has EVMS covered contracts, provide comments in the audit report on whether any findings are likely to impact the contractor's EVMS (10-1204.5b). Discuss findings and recommendations relating to the EVMS with the Contract Administration Office EVMS Monitor prior to issuance of the report. Immediately evaluate the impact of these findings on specific EVMS covered contracts and provide the details in flash EVMS surveillance reports (11-203.5.b).	
e. Update the permanent file in accordance with CAM 4-405.b (MAAR #3). Retain a copy of the approved W/P A ICAPS form. After the audit report is issued, update the ICRS database using the information on the approved W/P A ICAPS form and file the approved W/P A ICAPS form in the Electronic Contractor Permanent File (ECPF). (The control risk assessment (Section II) and overall system opinion (Section III) in the ICAPS may not be updated until the system report supporting the change is issued (CAM 3-306a).)	