

Master Document – Audit Program

Activity Code 17750		EVMS, System and Report Surveillance
Version 4.7, dated November 2009		
B-1	Planning Considerations	
Purpose		
<p>This audit program is intended for use in performing the annual earned value management system (EVMS) surveillance audit in those years where both system and report surveillance is required. If system surveillance is not required, and the surveillance audit will be limited to report surveillance only, the audit should be set up and performed under activity code 17760, EVM Report Surveillance (Report Only).</p>		
<p>This program is intended to provide a logical sequence to the audit effort, and to reflect a mutual understanding between the auditor and the supervisor as to the scope required to meet auditing standards and DCAA objectives for the current assignment. The audit steps in the program are intended as general guidance and should be modified as considered necessary to fit the current audit. Those steps not required should be marked "not applicable" (N/A), lined through, or deleted, as appropriate for your FAO. Portions of the audit which are covered in other assignments (e.g., audits of billing system, budgeting system, progress payments, MMAS, estimating system) should be referenced at the appropriate place in this program.</p>		
<p>The primary objective of EVMS guidelines is to ensure that contractors use effective internal cost and schedule control systems that provide contractor and Government managers with timely and auditable data to effectively monitor their programs, meet requirements, and control contract performance. In accordance with DoD policy, compliance with EVMS guidelines shall be required on significant contracts, subcontracts, or agreements within all acquisition programs, unless waived by DoD during the acquisition process. For this purpose, significant contracts/agreements are defined as research, development, test, and evaluation (RDT&E) contracts/agreements with a value of \$73 million or more and procurement or operations and maintenance (O&M) contracts/agreements with a value of \$315 million or more (in fiscal year 2000 constant dollars).</p>		
<p>When required by the contract, the cost and schedule control system used by the contractor in planning and controlling the performance of the contract must meet the guidelines specified in the American National Standards Institute (ANSI)/Electronic Industries Alliance (EIA) EVMS standard (ANSI/EIA-748-1998) (reproduced in Section 2 of the Earned Value Management Implementation Guide (accessed through DCAA Intranet under Audit Tools, EVMS)). Although Cost Performance Reports (CPRs) are usually required by contracts that are subject to full compliance with EVMS guidelines, DoD reporting requirements, such as the CPRs, Cost/Schedule Status Reports (C/SSRs), Contract Funds Status Reports (CFSRs), and Contractor Cost Data Reports (CCDRs), are specified separately in DD Form 1423, Contract Data Requirements List, contained in the</p>		

Master Document – Audit Program

contract.
EVMS surveillance begins with the award of the contract, continues through initial compliance and acceptance, and extends throughout the period of contract performance. In accordance with DoD policies and procedures, EVMS surveillance of the contractor's system after acceptance, and review of data emanating from that system, is to be accomplished by qualified individuals from the Contract Management Office (CMO) and DCAA. The objectives of EVMS surveillance are:
<ul style="list-style-type: none">• To ensure that the contractor's management control system continues to: (1) provide valid and timely management information; (2) comply with the DoD EVMS guidelines; (3) provide timely indications of actual or potential problems; and (4) provide baseline integrity.
<ul style="list-style-type: none">• To ensure that the contractor's required external cost and schedule reports contain: (1) information that is derived from the same data base as that used by contractor management; (2) explicit and comprehensive variance analysis including proposed corrective action in regard to cost, schedule, technical, and other problem areas; and (3) information that depicts actual conditions.
DCMA is the executive agent for implementation of EVM on DoD contracts. DCMA normally appoints a member of the CMO as the surveillance monitor. The CMO monitor is assigned the overall responsibility for coordinating and accomplishing the EVMS surveillance. The surveillance monitor is assisted by personnel from the functional divisions of the CMO and DCAA in performing the activity required by the surveillance plan. Therefore, close coordination between DCMA, CMO, and DCAA is required in the preparation of the surveillance plan to ensure effective EVMS surveillance and to avoid duplication of oversight. The purpose of this audit program is to facilitate DCAA's participation in this surveillance activity.
Scope
The scope of our surveillance audits will depend on the contractor's financial condition and how much reliance can be placed on the accounting system, internal controls, cost representations, and billing procedures. If the results of prior audits and the preliminary audit steps indicate low audit risk, audit scope should be reduced accordingly. This decision must reflect a mutual understanding between the auditor and supervisor as to the scope required to meet auditing standards and DCAA objectives for the current assignment. This program does not replace individual auditor judgment and may be supplemented to satisfy the needs of a particular assignment.
DCAA's surveillance responsibilities include (1) auditing the contractor's accounting system policies and procedures for compliance with EVMS guidelines and contract provisions (system surveillance); (2) performing periodic audits of selective financial data contained in various reports submitted by the contractor to determine whether they accurately reflect the contractor's books and records (report surveillance); and (3) performing periodic evaluations of related financial areas, including budgeting, direct and

Master Document – Audit Program

indirect costs, variance analysis, and forecasting.
References
The following references should be reviewed prior to starting the audit.
1. CAM 11-200, Audit of Contractor Compliance with Earned Value Management System (EVMS) Guidelines.
2. EVM Implementation Guide (accessed through DCAA Intranet under Audit Tools, EVMS).
3. DFARS 234.2, Earned Value Management System
4. DFARS 234.203, Solicitation Provision and Contract Clause.
5. DFARS 252.234-7001, Notice of Earned Value Management System.
6. DFARS 252.234-7002, Earned Value Management System.

B-1	Preliminary Steps	W/P Reference
	Version 4.7, dated November 2009	
	1. Obtain and review the risk assessment performed during preparation of the program plan to identify:	
	a. the initial assessment of the level of system surveillance required;	
	b. any ACO concerns;	
	c. high risk or high visibility contracts to include in the sample of reports generated from the EVMS;	
	d. the universe of contracts containing reporting requirements; and	
	e. the initial assessment of the number of contracts to test based on a 3 year cycling of contracts.	
	Note: If the risk assessment performed during the preparation of the program plan determined that no system surveillance was required, the audit should be set up and performed under activity code 17760, EVM Report Surveillance (Report Only).	
	2. Determine whether the contractor's EVMS has been accepted.	
	3. Review the following documents/items:	
	a. The contractor's System Description Document.	
	b. The EVMS Evaluation Guide that was completed during the	

Master Document – Audit Program

acceptance process.	
c. The surveillance plan prepared by the surveillance monitor and any revisions made since the last review.	
d. A list of all performance measurement reports and related reports submitted in response to the data requirements list (DD Form 1423) contained in covered contracts.	
e. Contractor policies and procedures for preparing CPRs, C/SSRs, and CFSRs.	
NOTE: If these documents/items are not available in the permanent file, they can be obtained from the CMO surveillance monitor.	
4. Contact the DCMA designated surveillance monitor and discuss DCMA’s surveillance plan:	
a. Identify those elements of the plan related to DCAA’s area of responsibility.	
b. Determine the reports and areas of the contractor's system planned for review during the current surveillance period.	
c. Determine if the Government contract administration and program office officials are aware of any cost or schedule problems that affect the contractor's estimate at completion (EAC). Determine and document what these officials have done to verify the accuracy of the EAC. If appropriate, obtain copies of any reports prepared (see CAM D-301).	
d. Discuss the planned scope of audit and determine if there are additional audit steps required to satisfy the customer’s needs or concerns.	
5. Document the need for technical assistance. Coordinate with the DCMA surveillance monitor and request any required technical assistance.	
6. Review the permanent files and audit leads to obtain background information, identify potential EVMS deficiencies, and identify high risk contracts to help establish the scope of audit.	
7. Understanding and Evaluating the Contractor’s Internal Control Structure	
a. Review relevant Internal Control Audit Planning Summaries (ICAPS) (or ICQ for nonmajor contractor where ICAPS have not been completed) to obtain and document an understanding of the estimating system and any other applicable internal control systems the contractor may have (e.g., labor, MMAS). Identify any deficiencies that would impact the audit and document their	

Master Document – Audit Program

potential impact on the contractor’s EVM system.	
b. If the contractor is classified as non-major (where ICAPS have not been completed), and if the evidential matter to be obtained during the audit is highly dependent on computerized information systems, document on working paper B-2 the audit work performed that supports reliance on the computer-based evidential matter. Specifically, document or reference one or more of the following in working paper B-2:	
(1) the audit assignment(s) where the reliability of the data was sufficiently established in other DCAA audits,	
(2) the procedures/tests that will be performed in this audit to evaluate the incurred costs that will also support reliance on the evidential matter, and/or	
(3) the tests that will be performed in this audit that will be specifically designed to test the reliability of the computer-based data.	
When sufficient work is not performed to determine reliability (i.e., reduce audit risk to an acceptable level), qualify the audit report in accordance with CAM 10-210.4 and 10-1204.4.	
8. Determine the extent EVMS guidelines flow down to subcontractors.	
a. Determine the extent of prime contractor surveillance.	
b. Determine whether the contractor has tasked its subcontractors to correct deficiencies noted in its surveillance reviews.	
c. In those cases where insufficient prime contractor surveillance is indicated, request an assist audit. (MAAR 12)	
9. Select the sample of contracts to test for the report surveillance portion of the audit. The sample of contracts should reflect:	
a. High-risk or sensitive contracts, including contracts where problems were identified in prior year testing,	
b. Plus a three-year cycling of contracts containing reporting requirements, with at least one contract tested per year.	
10. Arrange and conduct an entrance conference with the contractor's personnel responsible for the EVMS and preparing the selected reports.	
11. In planning and performing the examination, review the fraud risk indicators specific to the audit. The principal sources for the applicable fraud risk indicators are: <ul style="list-style-type: none"> • Handbook on Fraud Indicators for Contract Auditors, Section II (IGDH 7600.3, APO March 31, 1993) located at 	

Master Document – Audit Program

<p>http://www.dodig.mil/PUBS/igdh7600.doc</p> <p>(To access the handbook, copy and paste the web address shown above into the address block in Internet Explorer.)</p> <ul style="list-style-type: none"> • CAM Figure 4-7-3. <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>12. Summarize the results of the risk assessment and preliminary audit steps and clearly identify the planned scope of audit.</p>	

C-1	System Surveillance	W/P Reference
	<p>Version 4.7, dated November 2009</p>	
	<p>To ensure the contractor’s EVMS is continuing to operate as previously accepted, and is continuing to comply with the EVM guidelines, perform the following steps for those EVM guidelines assigned to DCAA and included in the scope of audit as documented in Section 6 of WP B.</p>	
	<p>1. <u>Accounting Guideline 16</u>. Record direct costs in a manner consistent with budgets in a formal system controlled by the general books of account.</p>	
	<p>a. Review the most recently completed audit of Control Environment and Overall Accounting Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.</p>	
	<p>b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:</p>	
	<p>(1) The contractor’s accounting system provides a basis for auditing all direct costs charged to contracts (i.e., the direct costs charged to contracts can be traced back to source documents).</p>	
	<p>(2) The accounting system accumulates and allocates direct costs to control accounts on the same basis as budgets.</p>	
	<p>c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.</p>	

Master Document – Audit Program

<p>2. <u>Accounting Guideline 17.</u> When a work breakdown structure (WBS) is used, summarize direct costs from control accounts into the work breakdown structure without allocation of a single control account to two or more work breakdown structure elements.</p>	
<p>a. Review the most recently completed audit of Control Environment and Overall Accounting Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.</p>	
<p>b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:</p>	
<p>(1) Actual costs are accumulated by WBS to allow for the direct comparison with associated budgeted costs by WBS.</p>	
<p>(2) No single control account is allocated to two or more WBS elements.</p>	
<p>c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.</p>	
<p>3. <u>Accounting Guideline 18.</u> Summarize direct costs from the control accounts into the contractor’s organizational elements without allocation of a single control account to two or more organizational elements.</p>	
<p>a. Review the most recently completed audit of Control Environment and Overall Accounting Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.</p>	
<p>b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:</p>	
<p>(1) Direct costs are accumulated to allow a direct comparison with associated budgets at the appropriate organizational level.</p>	
<p>(2) No single control account is allocated to two or more higher level organizational elements.</p>	
<p>c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.</p>	
<p>4. <u>Accounting Guideline 19.</u> Record all indirect costs which will be allocated to the contract.</p>	

Master Document – Audit Program

<p>a. Review the most recently completed audit of Indirect and Other Direct Cost System Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.</p>	
<p>b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:</p>	
<p>(1) Indirect costs are accumulated in accordance with the contractor’s Disclosure Statement or written accounting policies and procedures for appropriate allocation through the contract WBS and organizational structure to the contract level.</p>	
<p>(2) Indirect rates are updated in a timely manner to ensure realistic monthly allocations of indirect costs without significant adjustments to performance measurement information.</p>	
<p>c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.</p>	
<p>5. <u>Accounting Guideline 20</u>. Identify unit costs, equivalent unit costs, or lot costs when needed.</p>	
<p>a. Review the most recently completed audit of Control Environment and Overall Accounting Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.</p>	
<p>b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:</p>	
<p>(1) The accounting system can accumulate cost by lot, by unit or equivalent unit, as required.</p>	
<p>(2) The accounting system can separate contract costs into recurring and non-recurring categories when required by contract.</p>	
<p>c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.</p>	
<p>6. <u>Accounting Guideline 21</u>. For EVMS, the material accounting system will provide for (1) accurate cost accumulation and assignment of costs to control accounts in a manner consistent with budgets using recognized, acceptable, costing techniques, (2) cost performance measurement at the point in time most suitable for the category of material involved, but no earlier than the time of progress payments or</p>	

Master Document – Audit Program

actual receipt of material and (3) full accountability of all material purchased for the program including the residual inventory.	
a. Review the most recently completed audit of Material Management and Accounting System Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor's compliance with this EVM guideline.	
b. If the contractor's system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:	
(1) Material costs are being reported within the same accounting period as the associated earned value.	
(2) Cost performance for material occurs at the time most suitable for the type of material involved, but no earlier than point of receipt.	
(3) All material for the contract is fully accounted for (including residual material).	
c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.	
7. <u>Organization Guideline 4.</u> Identify the company organization or function responsible for controlling overhead (indirect costs).	
a. Review the most recently completed audit of Contractor Budget and Planning System Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor's compliance with this EVM guideline.	
b. If the contractor's system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:	
(1) The managerial positions responsible for establishing and controlling indirect budgets are clearly identified in the contractor's organizational structure.	
(2) The responsibilities of the above managerial positions are in writing and clearly described.	
c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.	
8. <u>Planning, Scheduling, and Budgeting Guideline 8.</u> Establish and	

Master Document – Audit Program

<p>maintain a time-phased budget baseline, at the control account level, against which program performance can be measured. Budget for far-term efforts may be held in higher level accounts until an appropriate time for allocation at the control account level. Initial budgets established for performance measurement will be based on either internal management goals or the external customer negotiated target cost including estimates for authorized but undefinitized work. On Government contracts, if an over target baseline is used for performance measurement reporting purposes, prior notification must be provided to the customer.</p>	
<p>a. Review the most recently completed audit of Contractor Budget and Planning System Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.</p>	
<p>b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:</p>	
<p>(1) The Performance Measurement Baseline (PMB) contains budgets for all costs at the level appropriate for project and/or company management.</p>	
<p>(2) Average indirect rates for the life of contract are not used (annual indirect rates should be used) to compute indirect costs included in the Performance Management Baseline. Average indirect rates may distort cost performance.</p>	
<p>c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.</p>	
<p>9. <u>Planning, Scheduling, and Budgeting Guideline 9.</u> Establish budgets for authorized work with identification of significant cost elements (labor, material, etc.) as needed for internal management and for control of subcontractors.</p>	
<p>a. Review the most recently completed audits of Material Management and Accounting System Internal Controls and Contractor Budget and Planning System Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.</p>	
<p>b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:</p>	

Master Document – Audit Program

(1) Budgets for material requirements are based on contractor material requirement documents.	
(2) Budgets for material expenses are time-phased in support of schedule requirements.	
(3) Labor costs are based on accepted forward pricing/budgeted rates and hours.	
(4) Indirect rates are based on accepted forward pricing/budgeted rates.	
(5) ODCs are based on ODC requirements contained in the contract.	
c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.	
10. <u>Planning, Scheduling, and Budgeting Guideline 13.</u> Establish overhead budgets for each significant organizational component of the company for expenses which will become indirect costs. Reflect in the program budgets, at the appropriate level, the amounts in overhead pools that are planned to be allocated to the program as indirect costs.	
a. Review the most recently completed audits of Control Environment and Overall Accounting Internal Controls and Contractor Budget and Planning System Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.	
b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:	
(1) The contractor’s Disclosure Statement and/or other written accounting policies and procedures includes a definition of indirect expenses, overhead pools, each item included in the composition of the overhead pools, and the basis for allocation of overhead costs to a contract over the life of the contract.	
(2) Projected overhead costs are adjusted in a timely manner to reflect changes in current or projected base costs, overhead costs and overhead structure.	
c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.	
11. <u>Analysis and Management Reports Guideline 22.</u> At least on a monthly basis, generate the following information at the control	

Master Document – Audit Program

<p>account level and other levels as necessary for management control using cost data from, or reconcilable with, the accounting systems: (1) Comparison of the amount of planned budget and the amount of budget earned for work accomplished. This comparison provides the schedule variance. (2) Comparison of the amount of the budget earned with the actual (applied where appropriate) direct costs for the same work. This comparison provides the cost variance.</p>	
<p>a. Review the most recently completed audits of Control Environment and Overall Accounting Internal Controls and Contractor Budget and Planning System Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.</p>	
<p>b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:</p>	
<p>(1) Labor, overhead and other rates used to calculate earned value are on the same basis as used to calculate associated budgets.</p>	
<p>(2) Actual cost data from the accounting system is used when determining cost variances.</p>	
<p>c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.</p>	
<p>12. <u>Analysis and Management Reports Guideline 24</u>. Identify budgeted and applied (or actual) indirect costs at the level and frequency needed by management for effective control, along with reasons for any significant variances.</p>	
<p>a. Review the most recently completed audit of Contractor Budget and Planning System Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.</p>	
<p>b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:</p>	
<p>(1) Management has procedures to evaluate variances between budgeted and actual indirect costs and will initiate actions to identify and correct causes of variances.</p>	
<p>(2) Indirect variances will be recorded by element of expense, i.e., indirect labor, fringe benefits, etc., and that the system requires</p>	

Master Document – Audit Program

that the cause of significant variances be identified and reported.	
c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.	
13. <u>Analysis and Management Reports Guideline 27.</u> Develop revised estimates of cost at completion based on performance to date, commitment values for material, and estimates of future conditions. Compare this information with the performance measurement baseline to identify variances at completion important to company management and any applicable customer reporting requirements, including statements of funding requirements.	
a. Review the most recently completed audit of Contractor Budget and Planning System Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.	
b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the attributes described below:	
(1) The most accurate rates are used to compute the estimates at completion (EAC) – historical rates, projected rates where applicable, etc.	
(2) The contractor compares budgeted indirect costs to estimates of final indirect costs and analyzes any significant differences with appropriate corrective actions.	
c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.	
14. <u>Revisions and Data Maintenance Guideline 30.</u> Control retroactive changes to records pertaining to work performed that would change previously reported amounts for actual costs, earned value, or budgets. Adjustments should be made only for corrections of errors, routine accounting adjustments, effects of customer or management directed changes, or to improve the baseline integrity and accuracy of performance measurement data.	
a. Review the most recently completed audit of Control Environment and Overall Accounting Internal Controls to determine the extent that the testing done in that audit can be used in determining the contractor’s compliance with this EVM guideline.	
b. If the contractor’s system has changed with respect to this guideline since the last system surveillance audit, evaluate the policies and procedures for continued compliance using the	

Master Document – Audit Program

attributes described below:	
(1) Adjustments to accounting data are made only for routine accounting adjustments (e.g., end of period accruals) or corrections of errors. Accounting changes should be controlled to prevent inappropriate changes to performance measurement information.	
(2) Accounting adjustments, when appropriate, are made in a timely manner.	
c. For all system surveillance audits, select a sample of contracts (from the contracts selected for report surveillance) to test the above attributes for implementation on contracts.	
d. Review the contracts selected under c., above for cost transfers between work breakdown structures (WBSs) on the contract and for transfers to other contracts.	
(1) Verify that transfers are properly approved and documentation is on file explaining the reasons for the transfers.	
(2) Determine if there appears to be a pattern to the transfers which indicates a recurring problem in booking of cost or a schedule problem.	
15. <u>Immediately advise the contractor and the surveillance monitor of any system deficiencies and report the condition using the guidance in CAM 11-203.5.</u>	

D-1	Evaluation of Reports - Report Surveillance	W/P Reference
Version 4.7, dated November 2009		
1.	Review the selected reports and verify the mathematical accuracy.	
a.	From the lowest levels, work packages, or cost accounts, summarize the budgeted and actual costs (accrued expenditures for the CFSR) of selected Work Breakdown Structure (WBS) elements through the WBS to the contract level and the CPR, C/SSR, or CFSR. This should be done for both the current month and cumulative to date amounts.	
b.	Verify that the Budgeted Cost of Work Scheduled (BCWS) and the Budgeted Cost of Work Performed (BCWP) on the CPR or C/SSR were computed in accordance with the Performance Measurement Baseline for the contract.	
c.	Verify amounts are summations from the lowest points of accumulation without intermediate allocations.	

Master Document – Audit Program

d. Verify that the indirect and labor rates applied are the originally planned rates for work scheduled (BCWS) and work accomplished (BCWP). Also, verify that acceptable rates are used for actual costs (e.g., the rates are calculated and applied in accordance with the contractor’s usual/disclosed cost accounting practices).	
2. Review the selected reports for compliance with contractual requirements, such as reporting due dates, format, and content.	
3. Obtain and review the contractor's reconciliation of the reports to the contractor's cost ledgers. Selectively trace the reported actual cost data to the contractor’s job cost ledgers.	
4. Immediately advise the contractor and the surveillance monitor of any system deficiencies and report the condition using the guidance in CAM 11-203.5.	

E-1	Reconciliations - Report Surveillance	W/P Reference
Version 4.7, dated November 2009		
1.	Reconcile the CPR or C/SSR to the CFSR using the guidance in “EVMS - DCAA Reconciliation of EVMS Reports” (Other Audit Guidance) at W/P 31b.”	
2.	Reconcile the CPR or C/SSR to reports prepared by the contractor for other purposes, such as contractor cost data reports (CCDR), quarterly limitation on payment statements (QLOP), progress payment requests, and public vouchers.	
3.	Request the contractor to explain any differences between the CPR or C/SSR, the CFSR, the cost ledgers, and the other reports. Differences that cannot be explained are indicators of significant internal control deficiencies in the cost accounting system and/or the performance measurement system.	
4.	Immediately advise the contractor and the surveillance monitor of any system deficiencies and report the condition using the guidance in CAM 11-203.5.	

F-1	Estimated Cost at Completion - Report Surveillance	W/P Reference
Version 4.7, dated November 2009		
NOTE: Because of the importance of estimated cost at completion to both the contractor and the Government, the auditor should perform a critical evaluation of the contractor’s proposed amount. Coordination		

Master Document – Audit Program

with technical personnel is necessary to properly evaluate the estimate at completion and preclude duplication of effort.	
1. Determine whether the EAC used by the contractor was a "bottoms-up" EAC or was formula driven. Refer to the contractor's system description document to determine the required frequency of "bottoms-up" EACs. Confirm the contractor is updating its EAC in accordance with the requirements of its system description.	
2. Confirm that data utilized in the EAC was prepared and approved by the responsible individual as defined in the system description document. Normally, someone such as the Cost Account Manager prepares the data.	
3. Verify that reasons for revisions to the EAC are fully documented and based on verifiable data.	
4. Determine if the EAC appears reasonable when compared to projections using trend analysis techniques. Note: DCMA frequently evaluates reported EACs using similar trend analysis techniques. Do not duplicate analyses available from the CMO or Program Office.	
a. Graphically plot the cumulative to date Budgeted Cost of Work Scheduled (BCWS), Budgeted Cost of Work Performed (BCWP), and Actual Cost of Work Performed (ACWP), on a monthly basis. Compare to identify unusual fluctuations (positive and negative) and trace to the cost account level to identify the underlying reasons (See "EVMS-Trend Analysis of EAC Using Performance Indexes" (Other Audit Guidance) at W/P 31a).	
b. Project the EAC using Cost Performance Indices (CPI)s and Schedule Performance Indices (SPI)s as explained in "EVMS-Trend Analysis of EAC Using Performance Indexes" (Other Audit Guidance) at W/P 31a.	
c. Significant differences between the EACs projected using the CPI and SPI and the contractor's "bottoms-up" ETC/EAC may indicate serious problems in the contractor's estimates and/or system and must be thoroughly investigated.	
d. Discuss these differences with the contractor, the surveillance monitor, and the program office, and request an explanation for the difference.	
e. If the difference is not explained to the satisfaction of the auditor, request a technical evaluation on the items in question.	
5. Evaluate the reasonableness of the contractor's "bottoms-up" ETC/EAC using the guidance in CAM 9-300.	

Master Document – Audit Program

a. Verify that the contractor has been consistent in its ETC/EAC preparation.	
b. Verify that the contractor has used appropriate rates and factors.	
c. Review the quantitative and qualitative aspects of the EAC for reasonableness utilizing Government technical assistance and assist audits if considered necessary (see CAM D-300).	
6. Consider the impact of any unreconciled differences between the EAC reported in the CPR or C/SSR, and other reports prepared by the contractor for other purposes, such as contractor cost data reports (CCDR), quarterly limitation on payment statements (QLOP), progress payment requests, and public vouchers (see W/P section E).	
7. Compare the EAC with recent projections used to prepare financial statements and tax returns, where available (see CAM 11-203.4d(3)(b)).	
8. Consider the impact of known cost or schedule variances on the evaluation of the EAC (see W/P section G). Request technical assistance as necessary.	
9. Immediately advise the contractor and the surveillance monitor of any system deficiencies and report the condition using the guidance in CAM 11-203.5.	

G-1	Variance Analysis – Report Surveillance	W/P Reference
	Version 4.7, dated November 2009	
	To ensure timely and responsible actions are taken by the contractor to identify causes and minimize the impact on contract performance:	
	1. Review schedule and cost variances disclosed in the CPRs or C/SSRs and contractor comments on significant problem areas, reasons for those variances, their impact on the program, and corrective action taken or to be taken.	
	2. If appropriate, coordinate with the surveillance monitor, Government program manager, technical specialists, etc., to assess impact of schedule slippage and problems in technical performance.	
	3. On a sampling basis, select areas of significant cost variances and trace to the required action level.	
	4. Determine if narrative descriptions provided by the contractor are valid and adequate. Discuss causes and proposed remedies with the contractor to assess responsiveness of proposed actions.	

Master Document – Audit Program

5. Determine if the impact of any existing variances are reflected in the estimate to complete the contract.	
6. Immediately advise the contractor and the surveillance monitor of any system deficiencies and report the condition using the guidance in CAM 11-203.5	

A-1	Concluding Steps	W/P Reference
Version 4.7, dated November 2009		
1.	Discuss the audit findings with the supervisor and hold an exit conference (follow the guidance in CAM 4-304.4).	
2.	Discuss the findings with the ACO and the surveillance monitor to ensure all pertinent information has been considered.	
3.	Complete indexing and reference working papers.	
4.	Draft Report (CAM 11-203.5 and 10-1200).	
	a. The report should fully describe any significant unresolved deficiencies together with recommendations for their correction.	
	b. When an assist audit and/or a technical evaluation is necessary, and is not obtained, the Qualification paragraph should be used to qualify the results of audit for the non-receipt of such reports (CAM 10-1204.4).	
5.	If the auditor has encountered information that constitutes evidence or raises suspicion that fraud or other illegal acts have occurred, refer such suspicion by completing a DCAA Form 2000 (see CAM 4-702.4 and 5).	
6.	Supervisory Review.	
7.	Complete administrative working papers and update permanent files (ICAPS, MAARs, CAS, etc.) (MAAR 1, MAAR 3).	