

MASTER AUDIT PROGRAM

Activity Code 19404	Compliance Audit CAS 404
B-1 Planning Considerations	Version 8.0, dated Jan 2023

Type of Service - Attestation Examination Engagement
Audit Specific Independence Determination
Members of the audit team and internal specialists consulting on this audit must complete the Audit Specific Independence Determination (WP 34) prior to starting any work on this assignment. <i>(Note: Because staff is sometimes added to on-going audits, supervisors should ensure that all individuals who are directing, performing audit procedures, or reporting on this audit as a member of the audit team who are performing as a consultant have signed this working paper. For example, an FAO may add additional auditors (e.g., technical specialists) to the audit assignment or may need to consult with an internal specialist (e.g., industrial engineers, and operations research specialists) as the audit progresses.)</i>

Purpose and Scope
1. The purpose of CAS compliance auditing is to determine if the contractor's policies, procedures, and practices used to estimate, accumulate, and report costs on Government contracts and subcontracts comply with the requirements of CAS. CAS 404 requires that, for purposes of cost measurement, contractors establish and adhere to policies with respect to capitalization of tangible assets which satisfy criteria set forth in CAS 404. It does not cover depreciation or disposition of fixed assets, which is covered by CAS 409. FAR 52.230-2, Cost Accounting Standards, requires the contractor to comply with the CAS 404 criteria (48 CFR 9904.404). Because of the interrelationship of the two standards and to achieve efficiency, CAS 404 and CAS 409 should be audited concurrently.
2. The scope of this audit should be limited to the last completed contractor fiscal year. For efficiency, CAS compliance testing, if possible, should be performed concurrently with tests for compliance with FAR and contract terms.
3. This program is intended to provide for the proper planning, performance, and reporting on the contractor's compliance with CAS 404. The audit steps in the program should reflect a documented understanding between the auditor, the technical specialist, as applicable, and the supervisor as to the scope required to comply in an efficient and effective manner with generally accepted auditing standards and DCAA objectives. The program steps are intended as general guidance and should be tailored as determined by audit risk.

Other Planning Considerations
1. Before beginning any CAS compliance audit, the auditor should first determine whether the contractor is subject to the CAS coverage. If the standard is not applicable to the contractor, the audit should be cancelled.

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Other Planning Considerations
2. Materiality (see 48 CFR 9903.305) and audit risk assessment are integral parts of the planning process and should be considered in developing the extent of CAS compliance tests.
3. Once it is determined that the standard is applicable, the auditor should assess which provisions of the standard are significant to the contractor; assess control risk; and the results of other relevant audits (e.g., results of prior compliance audits, Disclosure Statement revisions, etc.). The decision to not test whether the contractor is complying with specific provisions of the standard should be documented.
4. Prior to commencing the audit, review Agency guidance that may impact the audit and adjust the scope and procedures appropriately.

B-1 Preliminary Steps	WP Reference
Version 8.0, dated Jan 2023	
1. Research and Planning	
a. Read and become familiar with the criteria in CAS 404. Identify any changes in the CAS 404 standard since the last examination.	
b. Evaluate Part V of the contractor's Disclosure Statement to become familiar with the disclosed accounting practices. Determine if the contractor's disclosed practices have changed since the last CAS 404 compliance audit. If changes have occurred, document the file and adjust the audit scope accordingly.	
c. Determine whether the total value of the contractor's tangible capital assets are material. Possible sources include the contractor's financial statements, general ledger balances of plant, property and equipment, fixed asset subsidiary ledgers, depreciation schedules, CAS 414 Form CASB-CMF, and capital acquisition plans or budgets. Consider contract mix (Government vs. commercial) when determining the materiality of costs subject to this standard. Materiality should be a consideration only in determining the extent of substantive testing.	
d. Consider whether the contractor may be expensing assets that should be capitalized. Assets may be expensed in accounts such as Repairs and Maintenance, Plant Rearrangement, Supplies, Equipment, etc.	
e. Examine FAO permanent file data (i.e., relevant audit leads) and prior relevant audit work packages to determine what data are available, what audit steps were done in the past, and the results from those steps. This will identify areas of high risk and/or areas where limited or no compliance testing is necessary. Document results.	
f. Review permanent file to determine if previous audits included findings and recommendations that relate to the subject matter. If there were findings that are material to the subject matter, document this information in the risk assessment and perform the following procedures:	

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B-1 Preliminary Steps	WP Reference
<p>(1) Ask contractor management if corrective actions were taken to address findings and recommendations reported in previous DCAA audits (e.g., questioned costs, business system deficiencies, CAS audits) that are relevant to the subject matter of audit. If yes, have contractor explain corrective actions taken and determine if additional audit procedures should be included in the fieldwork to test the corrective actions. (GAGAS 7.13)</p> <p>(2) Document the results of the inquiry and the impact of the corrective actions to the subject matter under audit.</p>	

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B-1 Preliminary Steps	WP Reference
<p data-bbox="253 243 1187 422">g. Review permanent file to determine if the contractor has previously provided other studies or audits (e.g., summary listing of internal audits or external audit reports) that directly relate to the subject matter. If there are no other studies or audits, document that information in the working papers and perform the procedures below.</p> <p data-bbox="302 443 1208 621">(1) Ask contractor management if internal audits were performed. If yes, request contractor provide a summary listing of the internal audits that would assist us in understanding and evaluating the efficacy of the internal controls relevant to the subject matter of the audit.</p> <p data-bbox="302 642 1170 709">(2) If the review of the perm file or the contractor identifies relevant internal audits:</p> <ul data-bbox="350 730 1208 1339" style="list-style-type: none"><li data-bbox="350 730 1208 909">• Determine if access to these reports is necessary to complete the evaluation of the relevant internal controls to support the risk assessment or audit procedures related to the subject matter of the audit. There must be a nexus between the internal audit reports and the scope of this specific assignment.<li data-bbox="350 930 1073 963">• Document the results of the determination in writing.<li data-bbox="350 984 1198 1083">• If assignment is at a major contractor location, coordinate with the CAD or FAO point of contact (POC) for internal audit reports to request the contractor provide access to the reports.<li data-bbox="350 1104 1170 1203">• If assignment is at a non-major contractor and the FAO does not have a designated POC, the auditor should request the contractor provide access to the internal audit reports.<li data-bbox="350 1224 1198 1339">• The request should include information on how the internal audit report is relevant to the DCAA audit. Place a copy of the request in the assignment administrative working papers. <p data-bbox="302 1360 1170 1428">(3) If the review of the perm file or the contractor identifies relevant other audits or studies:</p> <ul data-bbox="350 1449 1198 1554" style="list-style-type: none"><li data-bbox="350 1449 1198 1554">• Obtain publicly available information for the relevant other Government agency audits (e.g., websites for DoD IG or other IGs, service audit agencies, etc.).	

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B-1 Preliminary Steps	WP Reference
<ul style="list-style-type: none"> • Make appropriate adjustments to your risk assessment and planned procedures based on the reported findings. <p>(4) Document the results of the inquiries including the response received from the contractor for any request for access to internal audit reports. (If access was not granted this should include the contractor’s rationale or justification for not granting access).</p> <p>(5) Determine if additional audit procedures are needed to respond to identified risk.</p>	
<p>h. Contact the contracting officer to ascertain any known concerns that will impact the audit and adjust the audit scope and procedures accordingly.</p>	
<p>i. If appropriate, coordinate with the FAO technical specialist, CAC and/or regional specialist on matters of interpretation and policy.</p>	
<p>j. Notify the appropriate contracting officer of the commencement of the risk assessment and that the expected completion date will be provided in the formal acknowledgement once the risk assessment is complete. The acknowledgement process should be performed in accordance with CAM 4-104.</p>	
<p>2. Entrance Conference and Preparation</p>	
<p>a. Arrange and conduct an entrance conference covering the areas highlighted in CAM 4-302 with particular emphasis on obtaining an understanding of the contractor’s capitalization process and its internal control structure. Request the contractor to explain the following:</p>	
<p>(1) Its capitalization system and process and identify relevant written policies and procedures.</p>	
<p>(2) If considered necessary, request a walkthrough of the capitalization system.</p>	
<p>(3) Any changes, or planned changes, to policies and procedures related to CAS 404 since the last DCAA examination.</p>	
<p>(4) Any business combinations since last DCAA CAS 404 examination.</p>	
<p>(5) Any corrective actions related to previously identified noncompliances. If applicable, include a follow up with contractor management on:</p> <ul style="list-style-type: none"> • corrective actions that address previous DCAA audit findings and recommendations, • other studies or audits that impact the subject matter. 	

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B-1 Preliminary Steps	WP Reference
(6) Dollar values of: <i>If the dollars are significant, consider separate transaction testing of these assets.</i>	
(a) Self-constructed assets placed in service since prior examination;	
(b) Assets acquired through less than arm's length transactions; and	
(c) Asset accountability units.	
(7) Capital budget variance analysis and explanation of significant variances. (If the capitalized amount is significantly less than the capital budget, assets may have been expensed when they should have been capitalized.)	
(8) Identify new facilities and major renovations. Consider separate transaction testing for initial complement of low cost equipment and betterments and improvements.	
b. If relying on the work of others, follow the procedures in CAM 4-1000.	
c. Issue a notification letter to the contractor regarding the audit in accordance with CAM 4-302.3.	
3. Risk Assessment	
a. Obtain and document an understanding of contractor internal controls relevant to the audit. Auditors may obtain a significant portion of this understanding during the walkthrough.	
b. Identify accounts where the contractor may be expensing assets that should be capitalized. These accounts could include Repairs and Maintenance, Plant Rearrangement, Supplies, Equipment, etc.	
c. Determine high-risk areas by performing the following:	
(1) Determine the dollar amounts in the various accounts.	
(2) Perform comparative analysis of the identified accounts to determine if significant changes may have occurred.	
(3) Determine provisions of the standard that are material.	

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B-1 Preliminary Steps	WP Reference
<p>d. During the entrance conference, or other appropriate meeting, make specific inquiries of contractor management and other appropriate parties regarding the following:</p> <ol style="list-style-type: none"><li data-bbox="302 373 1170 510">(1) Their knowledge of any actual, suspected, or alleged fraud or noncompliance with laws and regulations affecting the period of time corresponding to the subject matter under audit. (AT-C 205.33)<li data-bbox="302 533 1203 672">(2) If any specialists (internal or external) were used in the preparation of the subject matter. If yes, have the contractor explain how the specialists were used in the preparation of the subject matter. (AT-C 205.16)<li data-bbox="302 695 1198 833">(3) Whether any investigations or legal proceedings, that are significant to the engagement objectives, have been initiated or are in process with respect to the period of time corresponding to the subject matter. (GAGAS 7.14)<li data-bbox="302 856 1192 1031">(4) The existence of other audits and studies (performed by other than DCAA) that relate to the subject matter under audit. If yes, have the contractor explain the audits and studies performed, any related findings or recommendations, and any contractor corrective actions taken. (GAGAS 7.13) <p><i>Note: Specifically document in the working papers; the inquiries and the corresponding responses as well as how the responses affect the performance of the engagement.</i></p>	

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B-1 Preliminary Steps	WP Reference
<p>e. Based on the team's understanding of the criteria, subject matter, and the contractor and its environment, hold a planning meeting with the audit team (at a minimum, Supervisor and Auditor) to discuss and identify potential material noncompliances, whether due to error or fraud, that could affect the subject matter.</p> <p>The discussion should include:</p> <ul style="list-style-type: none"> • relevant prior audit experience (e.g., questioned cost, relevant reported accounting system deficiencies), • relevant aspects of the contractor and its environment, • risk of material noncompliance due to fraud (e.g., the extent of financial incentives, pressures to meet budgetary and contractual commitments, and opportunities to commit and conceal fraud). Consider the fraud risk factors and scenarios presented in the DoD OIG's webpage: Fraud Detection Resources for Auditors. Copy link and paste into web browser, • other known risk factors identified that could materially affect the subject matter, and • the audit team's understanding of relevant key internal controls. Document the factors identified that increase the risk of material noncompliance due to error or fraud that could affect the subject matter and design audit procedures to respond to the increased risk of material noncompliance. <p>Communication among audit team members should continue as needed throughout the audit regarding the risk of misstatement and noncompliance due to error or fraud.</p>	
<p>f. From the information gathered in the preceding steps and using the materiality criteria in 48 CFR 9903.305, assess the audit risk and determine the scope of audit and extent of compliance testing to be performed.</p>	
<p>g. Update the information in the permanent files as needed (MAAR 3).</p>	

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C-1 Written Policy	WP Reference
Version 8.0, dated Jan 2023	
1. Determine that the contractor has a written capitalization policy (CAS 404.40(a)).	
2. Determine that the written policy designates economic and physical characteristics as follows (CAS 404.40(b)(1):	
a. The <u>minimum service life</u> criterion, which shall not exceed <u>2 years</u> , but which may be a shorter period.	
b. The <u>minimum acquisition cost</u> criterion, which shall not exceed <u>\$5,000</u> , but which may be a smaller amount.	
c. Specific characteristics which are pertinent to its capitalization policy decisions (e.g., class of asset, physical size, identifiability and controllability, the extent of integration or independence of constituent units). (CAS 404.40(b)(2))	
d. Identification of asset accountability units to the maximum extent practical. The contractor's policy should consider (CAS 404.40(b)(3):	
(1) Whether the component represents a significant portion of the total unit's cost (materiality);	
(2) Whether the component is divisible from the total unit;	
(3) Whether the component is subject to separate valuation.	
e. Higher than \$5,000 minimum dollar limitations may be designated for original complement of low-cost equipment and for betterments and improvements if such higher limitations are reasonable in the contractor's circumstances (CAS 404.40(b)(4)).	
3. Determine and document the reliability of the information the audit team will use to reach their conclusions in this section.	

D-1 Acquisition Costs	WP Reference
Version 8.0, dated Jan 2023	
1. Evaluate significant items included in expense accounts, such as Repairs and Maintenance, Plant Rearrangement, Supplies, Equipment, etc. to determine if tangible assets which meet either the criteria in Steps 2a and 2b in WP C-1 or the criterion in 2e in WP C-1 are capitalized. (Audit tests in this area partially satisfy the requirements of MAAR 16.)	

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D-1 Acquisition Costs	WP Reference
<p>2. Evaluate significant items included in expense accounts, such as Repairs and Maintenance, Plant Rearrangement, Supplies, Equipment, etc. to determine that costs incurred subsequent to the acquisition of tangible capital assets which result in either extending the life or increasing the productivity of that asset (e.g., betterments and improvements) and which meet the contractor's established criteria for capitalization are capitalized with appropriate accounting for replaced asset accountability units. However, costs incurred for repairs and maintenance to a tangible capital asset which either restore the asset to, or maintain it at its normal or expected service life or production capacity, shall be treated as costs of the current period. (CAS 404.40(d)) (Audit tests in this area partially satisfy the requirements of MAAR 16.)</p>	
<p>3. Compare capitalized amounts of significant asset items to invoices, purchase orders, or sales contract to determine that the purchase price has been adjusted to the extent practical by premiums and extra charges paid or discounts and credits received which properly reflect an adjustment in the purchase price (CAS 404.50(a)(1)).</p>	
<p>4. Determine that the purchase price is the consideration given in exchange for an asset and is determined by cash paid or amount equivalent to what would be the cash price basis. If the amount is not available, determine that the current value of the consideration given in exchange is reasonable (e.g., market value or fair value). [Note: investment credit need not be deducted from the purchase price of a tangible capital asset in determining the acquisition cost of that asset.] Refer to CAS 404.50(a)(1)(i) and CAM 8-404.1 for details and examples.</p>	
<p>5. Determine that donated assets, which at the time of receipt meet the contractor's criteria for capitalization shall be capitalized at their fair value at that time (CAS 404.50(a)(1)(ii)).</p>	
<p>6. Determine that all costs necessary to prepare the asset for use including the cost of placing the asset in location and bringing it to a condition for normal or expected use are capitalized, such as initial inspection and testing, installation, and similar expenses where material in amount. However, materiality should be considered in deciding whether preparatory costs shall be capitalized. (CAS 404.50(a)(2)).</p>	
<p>7. Determine if the contractor capitalizes sales or use taxes or other collateral costs of acquiring tangible capital assets. If the contractor does capitalize these costs, determine if the contractor follows this practice on a consistent basis. (Note: CAS 404 permits, but does not specifically require, the capitalization of sales or use taxes or other collateral costs of acquiring tangible capital assets.)</p>	

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D-1 Acquisition Costs	WP Reference
8. Determine and document the reliability of the information the audit team will use to reach their conclusions in this section.	

E-1 Self-Constructed Assets (MAAR 16)	WP Reference
Version 8.0, dated Jan 2023	
<i>If the contractor does not have has a significant amount of self-constructed assets, perform the steps under this section.</i>	
1. Determine that tangible capital assets constructed or fabricated by a contractor for its own use are capitalized at amounts which include all indirect costs properly allocable to such assets. This includes G&A expenses and cost of money when such expenses are identifiable with the constructed asset and are material in amount (CAS 404.50(b)).	
2. Determine that constructed tangible capital assets which are identical with or similar to the contractor's normal product receive an appropriate share of all indirect cost including G&A expenses and cost of money. Constructed assets which are not similar to the contractor's normal products bear only those G&A expenses specifically identifiable with the asset and material in amount.	
3. Determine and document the reliability of the information the audit team will use to reach their conclusions in this section.	

F-1 Less Than Arm's Length Transaction	WP Reference
Version 8.0, dated Jan 2023	
1. Determine if previously used tangible capital assets that were acquired by purchase or donation were obtained in an arm's length transaction.	
2. If the acquiring transaction is not an arm's length transaction, determine if the contractor limited the capitalized acquisition cost of the asset to the capitalized cost of the asset in the hands of the owner who last acquired the asset through an arm's length transaction, reduced by depreciation charges from date of that acquisition to date of gift or sale (CAS 404.50(c)).	
3. Determine and document the reliability of the information the audit team will use to reach their conclusions in this section.	

G-1 Capitalization – Purchase Method	WP Reference
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<i>Note: This step applies only to external business combinations.</i>	

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G-1 Capitalization – Purchase Method	WP Reference
<p>1. Business combinations taking place prior to the applicability date of the April 15, 1996 revision to CAS 404.</p> <p>Obtain the contractor’s explanations on the accounting treatment of the acquired tangible capital assets. Evaluate asset ledger/report to determine that the asset is capitalized at an amount which does not exceed the fair value at date of acquisition. Where the fair value of identifiable, acquired assets less liabilities assumed exceeds the purchase price of the acquired company in an acquisition under the "purchase method," the value otherwise assignable to tangible capital assets shall be reduced by a proportionate part of the excess. Simply stated, the capitalized value can neither exceed the purchase price of the acquired company nor the fair value of the assets acquired.</p>	
<p>2. Business combinations taking place after the applicability date of the April 15, 1996 revision to CAS 404.</p>	
<p>Obtain the contractor’s explanations on the accounting treatment of the acquired tangible capital assets and supporting documents and verify:</p>	
<p>a. If the assets generated either depreciation expense or cost of money charges during the most recent cost accounting period prior to a business combination, determine that the assets are capitalized by the buyer at the net book value (no step-up, no step-down) of the assets as reported by the seller at the time of the transaction (CAS 404.50(d)(1)).</p>	
<p>b. If the assets did not generate either depreciation or cost of money charges in the most recent year, determine that the assets are capitalized at an amount which does not exceed the fair value at the date of acquisition. When the fair value of identifiable acquired assets less liabilities assumed exceeds the purchase price of the acquired company, the value otherwise assignable to tangible capital assets shall be reduced by the excess (CAS 404.50(d)(2)).</p>	
<p>3. Determine and document the reliability of the information the audit team will use to reach their conclusions in this section.</p>	

H-1 Asset Accountability Units	WP Reference
Version 8.0, dated Jan 2023	
<p>1. If the contractor uses asset accountability units, determine if the contractor identifies and separately capitalizes the assets at the time the assets are acquired (CAS 404.50(f)).</p>	
<p>2. Determine if the contractor removed units from the asset accounts when they were disposed of; or if replaced, their replacements are capitalized (CAS 404.50(f)).</p>	

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H-1 Asset Accountability Units	WP Reference
3. Determine and document the reliability of the information the audit team will use to reach their conclusions in this section.	

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A-1 Concluding Steps	WP Reference
Version 8.0, dated Jan 2023	
1. Summarize and document the results of audit.	
<p>2. Discuss the audit results with the supervisor and, if applicable the technical specialist. The auditor should only report those noncompliances which are considered material. Coordinate significant or unusual issues with the CFAO, FAO Manager, and if applicable, with the CAD network (see CAM 8-302.4 and 8-302.6). Coordination should be both before and after discussion of results with the contractor. The CFAO should be apprised of noncompliance matters at the earliest possible date.</p> <p><i>Note: If a noncompliance is considered immaterial, but could become material if circumstances change, notify the CFAO through a memorandum. The memorandum will include a Statement of Condition and Recommendation (SOCAR) and provide the CFAO with sufficient information to understand the condition and the severity of the CAS noncompliance. The only exception to issuing a memorandum is if the audit report includes a material noncompliance(s). When a material noncompliance is reported, the immaterial noncompliance will be reported in a separate exhibit to the report titled "Noncompliance that Warrants Attention of the Cognizant Federal Agency Official." Reference to the exhibit for the immaterial noncompliance will be in the Executive Summary, but will not be included in the Basis of Opinion section, as it is not a material noncompliance.</i></p>	
3. Prepare draft audit report (and memorandum, if applicable). If the audit scope was limited to a certain area(s) of the contractor's accounting practices, modify the subject matter stated in the Report On (from WP A01) and Opinion (from WP A) section of the report as necessary so that they clearly identify the limited areas audited.	
4. If a material weakness or significant internal control deficiency is detected during the course of this audit, ensure that the findings have been fully developed to determine if a significant deficiency in compliance with the DFARS 252.242-7006 criteria exists. If so, open a Business System Deficiency assignment (Activity Code 11090) to report the deficiency and submit it to the contractor for comment.	
5. Hold an exit conference with the contractor and provide a draft report (and memorandum, if applicable) to the contractor for comments in accordance with CAM 4-304. Obtain supervisory review, and management review if required, of the working papers and draft audit results section of the audit report (and memorandum, if applicable) before discussion with the contractor.	
6. Finalize audit report (and memorandum, if applicable) incorporating the contractor's and auditor's response, if applicable.	
7. Complete the administrative working papers.	

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A-1 Concluding Steps	WP Reference
8. Update the permanent files. <i>Ensure that a copy of DMIS Report Number CAS 3 entitled "CAS Compliance Testing (Activity Code 194XX)" is included in the permanent file after the assignment has been closed in DMIS.</i>	
9. Submit the working paper package and draft report (and memorandum, if applicable) to the supervisor/manager for final review and processing.	