

MASTER AUDIT PROGRAM

Activity Code 17740	Preaward Survey of Prospective Contractor Accounting System
B-1 Planning Considerations	Version 9.2, dated Jan 2025

Type of Service - Attestation Examination Engagement
Audit Specific Independence Determination
<p>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.</p> <p><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></p>

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Purpose and Scope

The objective of this audit is to opine as to whether the design of the contractor's system is acceptable for the award of a prospective Government contract based on the criteria defined in the Preaward Survey of Prospective Contractor Accounting System, SF 1408. The auditor will also determine if the system is in operation, or set up, but not in operation.

DCAA FLAs help buying commands work with contractors to complete the Preaward Survey of Prospective Contractor Accounting System checklist asserting they meet the SF 1408 criteria, and providing a narratives describing how they meet each criterion. If the request for audit does not include an assertion from the contractor, contact the Contracting Officer (CO). If the CO did not request the contractor complete the Pre-Award Survey of Prospective Contractor Accounting System checklist, request the contractor complete it. A pro forma letter with the checklist is available as an OAG.

This audit only evaluates the design effectiveness, not the operating effectiveness, of the accounting system. Procedures performed to evaluate design effectiveness include inquiry of appropriate personnel, observation of the entity's operations, and inspection of relevant documentation. Ordinarily, walkthroughs including a combination of these procedures are sufficient to evaluate the design of the accounting system. **Detailed testing of transactions and performance of the controls are not necessary to test design effectiveness.**

If requested to perform a Preaward Survey of Prospective Contractor Accounting System Audit on a contractor that has an active Government contract, review the permanent file to determine if a preaward or post contract award accounting system audit was already performed. Contact the contracting officer to determine if the prior report will meet their needs. Additionally, inform the contracting officer of any known system deficiencies or voucher processing problems.

If this is a follow up request to a previous preaward accounting system survey, determine whether a follow up is appropriate. The scope of the follow-up audit is limited to verifying the contractor has made no significant revisions to the design of the system (other than those required as corrective action to cited deficiencies) and whether the corrective action adequately addresses the deficiencies. If the previous preaward was completed less than 12 months ago, and the contractor's system has not significantly changed, modify the audit program appropriately. If the previous preaward accounting system survey was performed more than 12 months ago, and/or the contractor's system significantly changed, perform a full preaward audit. If a follow up audit is not appropriate, coordinate with the contracting officer.

The contractor's accounting system must be either in operation, or set up, but not in operation. If requested to perform a Preaward Survey of Prospective Contractor Accounting System Audit on a contractor that has not yet established their accounting structure, policies and procedures, and/or a plan for implementation, do not perform an audit. Contact the contracting officer to inform them that the SF 1408 cannot be completed because the contractor is unable to demonstrate that the design is capable of accomplishing the criteria.

If the request is for a Preaward Accounting System Survey for a proposed subcontract, determine what effort the prime contractor has taken to determine if the accounting system is acceptable. FAR 9-104.4 indicates the prime contractor is generally responsible for prospective subcontractors. The audit may not be necessary unless the subcontractor formally denies access to the prime contractor.

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Other Planning Considerations
Prior to commencing the audit, review Agency guidance that may impact the audit and adjust the scope and procedures appropriately.
References
1. CAM 5-200, “Pre-Award Surveys and Adequacy of Accounting System for Contractual Requirements”
2. FAR 9.105, “Procedures (for determination of contractor’s responsibility)”
3. FAR 9.106, DFARS 209.106, PGI 209.106, “Preaward Surveys”
4. FAR 52.216-16(g), “Quarterly Limitation on Payments Statement” (FPI contracts); and FAR 52.232-20, “Limitation of Cost.”

B-1 Preliminary Steps	WP Reference
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<ol style="list-style-type: none"> 1. Review the audit request and contact the Contracting Officer (CO). <ol style="list-style-type: none"> a. Notify the 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. b. Discuss any customer concerns that will impact the assessment of audit risk and adjust the audit scope and associated audit procedures accordingly (CAM 4-104.a.). c. Obtain information on the proposed Government contract (e.g., type and amount of contract, special contract provisions, etc.). 	
<ol style="list-style-type: none"> 2. Review the permanent file and any prior audits, and document any issues impacting the current scope of audit. <p><i>If a perm file does not exist or is not current, provide a list of items (e.g., organizational charts, financial statements, policies and procedures, etc.) from the contractor to perform the audit. Update the permanent file (See CAM 4-405.1).</i></p> 	

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B-1 Preliminary Steps	WP Reference
<p>3. Review permanent file to determine if previous audits included findings and recommendations that impact the subject matter. If there were findings material to the subject matter, document this information in the risk assessment and perform the following procedures:</p> <ul style="list-style-type: none">a. 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)b. Document the results of the inquiry and the impact of the corrective actions to the subject matter.	
<p>4. 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.</p> <ul style="list-style-type: none">a. 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.b. If the review of the perm file or the contractor identifies relevant internal audits:	

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B-1 Preliminary Steps	WP Reference
<ul style="list-style-type: none"> • 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. • Document the results of the determination in writing. • 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. • 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. • 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. • 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>c. If the review of the perm file or the contractor identifies relevant other audits or studies:</p> <ul style="list-style-type: none"> • Obtain publicly available information for the relevant other Government agency audits (e.g., websites for DoD IG or other IGs, service audit agencies, etc.). • Make appropriate adjustments to your risk assessment and planned procedures based on the reported findings. <p>d. Determine if additional audit procedures are needed to respond to identified risk.</p>	
<p>5. Review the contractor's assertion and narrative describing how they meet the SF 1408 criteria. Obtain an understanding of the controls the contractor has in place, and document any areas of risk of noncompliance. Determine audit procedures to address those risk areas.</p> <p><i>Note: A smaller, less complex entity might achieve its control objectives in a different manner compared to a larger, more complex organization (e.g., they may have less employees which limits their opportunities to segregate duties).</i></p>	

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B-1 Preliminary Steps	WP Reference
<p>6. If this is a follow-up audit, document the procedures performed to determine that continual reliance can be placed on the work performed under the initial preaward audit (e.g., what was done to ensure no changes have taken place that would impact the areas we are not specifically looking at in the follow-up).</p>	
<p>7. 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 estimating or 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 budget or contractual commitments, and opportunities to commit and conceal fraud). Consider the DoD IG website Fraud Detection Resources for Auditors for common fraud risk factors. Copy link and paste into web browser, • other factors identified that increase the risk of material noncompliance with laws and regulations, and • the audit team's understanding of relevant key internal controls. <p>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> <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>8. Conduct an entrance conference (see CAM 4-302). Explain to the contractor's representatives that we will communicate issues as they are developed during the audit for fact-finding and timely resolution. If applicable, follow up with contractor management on:</p> <ol style="list-style-type: none"> a. corrective actions that address previous DCAA audit findings and recommendations, b. other studies or audits that impact the subject matter. 	

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B-1 Preliminary Steps	WP Reference
<p>9. During the entrance conference, or other appropriate meeting, make specific inquiries of contractor management and other appropriate parties regarding the following:</p> <ul style="list-style-type: none">a. 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)b. 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)c. 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)d. 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>	
<p>10. Transmit an acknowledgement to the Contracting Officer and a notification letter to the Contractor to formally notify them of the audit and expected completion date in accordance with CAM 4-104 and CAM 4-302.3.</p>	
<p>11. Using the information obtained, prepare a risk assessment to determine the scope of the examination (WP B).</p>	

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C-1 Preaward Survey (SF 1408)	WP Reference
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Prepare “Preaward Survey of Prospective Contractor Accounting System” (SF 1408) by completing the following audit steps. The latest version of the SF 1408 can be obtained at: https://www.gsa.gov/reference/forms/preaward-survey-of-prospective-contractor-accounting-system	
<p>Based on the contractor’s assertion, narratives, and walkthroughs/demonstrations (observations, inquiries, and inspections), determine if the contractor’s system is suitably designed for award of a prospective contract.</p> <p>When performing the following audit steps, remember procedures performed to evaluate design effectiveness may include a mix of inquiry of appropriate personnel, observation of the entity’s operations, and inspection of relevant documentation (e.g., policies and procedures, prospective reports, and general ledger examples). Transaction testing is not required.</p> <p>If a contractor’s system has been implemented, a documented walkthrough/demonstration of the system is ordinarily sufficient to evaluate design effectiveness.</p> <p>If the contractor designed the system, but has not yet implemented the system, include a mix of inquiries, observation, and inspection to evaluate the effectiveness of the design of the system. This may include discussions with responsible personnel and review of written policies and procedures, such as charts of account, etc. Note: Inquiry alone is not sufficient. Observation, and/or inspection of documentation is necessary as well.</p>	
1. Generally Accepted Accounting Principles. Determine if the contractor’s accounting system is designed to be in accordance with GAAP (e.g., does the contractor have or intend to have an accrual basis accounting system, dual entry accounting, a general ledger they plan to post costs to, and the ability to generate basic financial reports). (SF 1408, Section II, 1)	
2. Proper segregation of costs. Determine if the system is designed to preclude direct charging of indirect expenses and indirect charging of direct contract costs. (SF 1408, Section II, 2a)	
3. Direct costs by contract. Determine if the system is designed to produce a subsidiary job cost ledger that accumulates costs by contract at a level of detail consistent with that used by the prospective contractor in its proposal. (SF 1408, Section II, 2b)	

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C-1 Preaward Survey (SF 1408)	WP Reference
<p>4. Allocation of indirect costs.</p> <ul style="list-style-type: none"> a. Determine that the system is designed to accumulate indirect costs in logical groupings. b. Determine if the groupings are allocated based on benefits accrued to intermediate and final cost objectives. c. Determine if the cost accounting system is documented with a written description of the contents of bases and pools. (SF 1408, Section II, 2c) 	
<p>5. Accumulation of costs under general ledger control. Determine if the contractor's system is designed to allow the job cost ledger, or its equivalent, to be reconciled and routinely posted to the general ledger control accounts (e.g. totals for direct labor, direct material, subcontracts, other direct costs). (SF 1408, Section II, 2d)</p>	
<p>6. Timekeeping system. Determine if the system is designed to allow labor charging to intermediate and final cost objectives based on timekeeping documents (paper or electronic timecards) and verify that the contractor has policies, procedures or instructions that require timesheets be completed and certified by the employees and approved by the employees' supervisors. (SF 1408, Section II, 2e)</p>	
<p>7. Labor distribution. Determine if the system is designed so that labor cost distribution records:</p> <ul style="list-style-type: none"> a. are reconcilable to payroll records, and b. can be reconciled to the cost accumulation records in labor subsidiary or general ledger accounts. (SF 1408, Section II, 2f) 	
<p>8. Interim determination of costs. Determine if the contractor posts, or plans to post, contract costs at least monthly to books of account. (SF 1408, Section II, 2g)</p>	
<p>9. Exclusion of Unallowables. Discuss and document the contractor's plan to identify and exclude unallowable costs if the contract is awarded. (SF 1408, Section II, 2h)</p>	
<p>10. Costs by Contract Line Item: If the prospective contract requires costs to be reported by CLIN or unit, determine what level is required. and if the system is designed to be expanded to the requisite level of detail (i.e. costs can be accumulated by sub accounts within the job cost ledger and includes details by multiple contract line items specified by the contract). (SF 1408, Section II, 2i)</p>	
<p>11. Preproduction Costs (Applies primarily to manufacturing contracts): Determine if the system is designed to segregate preproduction from production costs (to assist in repricing or follow-on contract pricing). (SF 1408, Section II, 2j)</p>	

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C-1 Preaward Survey (SF 1408)	WP Reference
12. Limitation of Costs: Determine if the system is designed to ensure that: a. Interim indirect expense rates can to be readily calculated from the books of accounts, b. Interim rates are routinely monitored. c. Controls are established to ensure compliance with the reporting requirements of FAR 52.216-16(g) or FAR 52.232-20. (SF 1408, Section II, 3a)	
13. Billings (e.g. progress payments, public vouchers): (CAM 6-1006) (SF 1408, Section II, 3b and FAR 32.504). Perform the following:	
a. Determine if the system is designed so that billings can be reconciled to the cost accounts for both current and cumulative amounts claimed.	
b. Determine if the contractor has procedures to ensure that subcontractor and vendor costs are only included in billings if payment to the subcontractor or vendor will be made in accordance with the terms and conditions of the subcontract or invoice and ordinarily within 30 days of the contractor's payment request to the Government.	
14. Adequate, Reliable Data: Based on the procedures above, summarize on WP C your conclusions on whether the contractor's system is designed to produce cost information at a sufficient level of detail for use in pricing follow-on contracts. (SF 1408, Section II, 4)	
15. 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
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1. Summarize and document the audit results.	
2. Obtain final supervisory auditor/manager review of the working papers and audit results.	
3. After management approval, hold and document an exit conference with the contractor representative in accordance with CAM 4-304.	
4. Draft the audit report in accordance with CAM 10-200 and SF 1408 to be furnished as part of the report. The narrative section of the SF 1408 should only include the following statement “See DCAA Audit Report No. (insert audit report number), dated (insert date) for information supporting this form.”	
5. Communicate with the contracting officers upon completion of the audit and document the communications.	
6. Complete the administrative working papers.	
7. Update the permanent file.	
8. Submit the working paper package and draft report to the supervisor/manager for final review and processing.	