

MASTER AUDIT PROGRAM

Activity Code 19100	Compliance of Revised Disclosure Statement
Version 5.0, dated July 2020	
B-1	Planning Considerations
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>	
Purpose and Scope	
<p>This standard audit program assists the auditor in planning and performing the audit of cost accounting practices submitted in a Disclosure Statement amendment in order to support the cognizant Federal agency official's (CFAO) determination of revised cost accounting practices (including corrections of noncompliances) for compliance with applicable CAS and FAR Part 31, as required by FAR 30.604(b) or FAR 30.605(c)(2). The audit program does not include testing actual practices for compliance with CAS and FAR Part 31, because we perform those tests in conjunction with routine audits (i.e., forward pricing, incurred costs, CAS compliance audits, etc.).</p> <p>NOTE: This program does not replace individual auditor judgment and therefore, must be tailored to reflect a mutual understanding between the audit team as to the scope required to meet auditing standards and objectives for this specific assignment.</p>	
Other Planning Considerations	
<p>Prior to commencing the audit, review Agency guidance that may impact the audit and adjust the scope and procedures appropriately.</p>	
References	
1. CAM Chapter 8, Cost Accounting Standards	
2. CAS Board Rules, Regulations, and Standards	
3. DoD CAS Working Group Guidance Papers 76-6, and 77-20	
4. 48 CFR 9903.202	

MASTER AUDIT PROGRAM

B-1	Preliminary Steps	WP Reference
Version 5.0, dated July 2020		
1.	Document that the contractor is still performing CAS-covered contracts that requires maintenance of a Disclosure Statement.	
2.	<p>Make a determination of adequacy for the part(s) of the statement requested for audit.</p> <ul style="list-style-type: none"> • Determine if the contractor followed the General Instructions in completing the form. WP B-04 contains the “Conformity of Disclosure Statement with General Instructions” tool to assist in making this determination. • Determine if the contractor was consistent in completing the items of the Disclosure Statement. WP B-05 contains the “Internal Consistency of Disclosed Practices in a Disclosure Statement” tool to assist in making this determination. • Coordinate with the contractor to provide a walkthrough of the Disclosure Statement to gain an understanding of the basis of the described practices in the Disclosure Statement and obtain other information needed to complete the risk assessment. • Coordinate with the CFAO and provide him/her with enough information to resolve any inadequacies in the descriptions in the revised disclosure statement before an audit is requested. A separate adequacy notification memorandum will not be issued as adequacy is implied upon acceptance of any audit engagement. • Coordinate a post walkthrough meeting with the CFAO to discuss the revised practices which are not significant (i.e., clarifications) and those that are significant (i.e., change in accounting practice) and the risks associated with each. This meeting should result in a determination of the revised practices to be audited. <p>Document the audit team’s conclusion about the adequacy of the part(s) of the statement requested for audit.</p>	
3.	Review the audit request to determine the nature and objective of the audit. Note any specific information requested and special requirements. If necessary, contact the requestor to obtain clarification of the request and discuss any specific concerns or special requirements they may have and adjust the audit scope and procedures accordingly.	
4.	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.	
5.	Analyze and classify the revised practices subject to audit	

MASTER AUDIT PROGRAM

<p>a. If applicable, document the contractor's notification of cost accounting practice changes, or corrections of noncompliant practices, submitted with the Disclosure Statement revisions (required by FAR 52.230-6(b)).</p>	
<p>b. Determine and document the reason for the revised item(s) of the submission:</p> <ul style="list-style-type: none"> • correction of noncompliance, • implementation of a particular cost accounting practice change (unilateral, desirable, or required), • initial adoption of cost accounting practice for a new cost or function • partial or total elimination of a cost accounting practice because the cost or function is eliminated, and/or • administrative revision that only alters the description of, but does not reflect any alteration to, the contractor's cost accounting practice. (<i>Note – As part of the coordination with the CFAO no administrative change should be sent for audit.</i>) <p><i>Note: Organizational changes by themselves are not changes in cost accounting practices. However carefully evaluate organizational changes which result in a change in the method or technique the contractor uses to measure costs, assign costs to cost accounting periods, or allocate costs to cost objectives to determine if changes in cost accounting practices occurred. (CAM 8-303.3.d).</i></p>	
<p>6. Review perm file, and prior/in-process audits, for significant and relevant risk factors such as, but not limited to:</p> <ul style="list-style-type: none"> • Prior CFAO determinations of compliance • Audit leads • Prior audit tests of compliance and audit findings • Outstanding CAS and FAR noncompliance(s). <p>Evaluate the impact on the scope of this audit.</p>	
<p>7. 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> <p>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</p>	

MASTER AUDIT PROGRAM

<p>procedures should be included in the fieldwork to test the corrective actions. (GAGAS 7.13)</p> <p>b. Document the results of the inquiry and the impact of the corrective actions to the subject matter.</p>	
<p>8. 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>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. :</p> <p>b. If the review of the perm file or the contractor identifies relevant internal audits:</p> <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. <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. Document the results of the inquiries including the response received from the contractor for any request for access to internal audit reports.</p>	

MASTER AUDIT PROGRAM

<p>(If access was not granted this should include the contractor's rationale or justification for not granting access).</p> <p>e. Determine if additional audit procedures are needed to respond to identified risk.</p>	
<p>9. Ascertain whether the revision(s) will affect any outstanding noncompliance issues or any other current audit assignments, such as a price proposal. If so, notify other teams with ongoing audits at this contractor of the cost accounting practice change and inform them that they should consider its impact on their audit(s).</p>	
<p>10. Assess materiality of the practice(s) subject to audit.</p>	
<p>11. 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"> 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 205.32) b. 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) c. 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>12. 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). 	

MASTER AUDIT PROGRAM

<p>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,</p> <ul style="list-style-type: none"> • other known factors that increase the risk of 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>13. Using the framework and the guidelines in WP B-2, obtain and document an understanding of the contractor's internal controls that are relevant to compiling and maintaining that the Disclosure Statement amendment is compliant with CAS and FAR Part 31. Auditors should be able to obtain a major portion of this understanding during a walkthrough of the contractor's assertion.</p>	
<p>14. Review and discuss with your supervisor (or if appropriate, the audit team) the overall results of the risk assessment and reach an agreement on the:</p> <ol style="list-style-type: none"> a. planned audit scope, including the detailed audit steps (-01 working papers) to be performed, b. timeframe for completing the audit including the proposed delivery date, which will be discussed with the requester and mutually agreed-to, and c. zero-based budget. d. Make any further adjustment to the audit program steps necessary to obtain sufficient evidence to provide a reasonable basis for the conclusion that will be expressed in the audit report. 	
<p>15. Obtain and document supervisory approval of the risk assessment and the planned scope of examination in working paper B and -1 working papers.</p>	
<p>16. Conduct an entrance conference. Confirm the team's understanding of the cost accounting practices being audited and supporting data. Discuss the availability of required data and personnel necessary to timely support the audit. If applicable, include a follow up with contractor management on:</p> <ol style="list-style-type: none"> a. corrective actions that address previous DCAA audit findings and recommendations, and b. other studies or audits that impact. 	

MASTER AUDIT PROGRAM

17. Issue a notification letter to the contractor regarding the audit in accordance with CAM 4-302.3.	
18. Issue a final acknowledgment memorandum to the CFAO to communicate our audit scope and the agreed-to due date.	

C-1	Evaluation of Compliance	WP Reference
Version 5.0, dated July 2020		
1.	Prepare a list detailing CAS applicability dates for each standard used to evaluate compliance of the contractor's disclosed cost accounting practices (CAM 8-301.c.). <i>Note: Use the list to determine if the Cost Accounting Standard is applicable, based on the date of applicability, before citing a CAS noncompliance.</i>	
2.	Determine the applicable cost accounting standards included in the scope of audit established in the risk assessment. Compare the disclosed practice to the requirements of the relevant standards and document whether the practice complies with the standard. Limit the scope for the audit to compliance of disclosed practices with the standard and applicable FAR Part 31 cost principle. Compliance of actual practices is tested in other routine audits (i.e., forward pricing, incurred costs, CAS compliance audits, etc.). Document findings and conclusions in sufficient detail to enable an experienced auditor to understand the extent and results of the procedures performed to determine if the disclosed practice is compliant with CAS and FAR Part 31 (GAGAS 7.34).	
	a. <i>Add Tailored Steps from Planning and Risk Assessment (B) here</i>	
	b.	
	c.	
3.	Obtain and incorporate results of assist audit(s), if requested.	
4.	Coordinate significant or unusual issues with the supervisor and, if applicable, the technical specialist.	
5.	If part of a CAD or home office network, obtain feedback on similar audit issues within the network.	

A-1	Concluding Steps	WP Reference
Version 5.0, dated July 2020		
1.	Summarize and document the results of audit.	
2.	Discuss results with the supervisor and, if applicable, the technical specialist.	

MASTER AUDIT PROGRAM

3. Prepare draft audit report.	
4. Hold an exit conference with the contractor and provide a draft report to the contractor for comments in accordance with CAM 4-304. Obtain supervisory/management review of the working papers and draft audit results section of the audit report before discussion with the contractor.	
5. Brief the CFAO on significant and/or complex findings/issues.	
6. Finalize audit report incorporating the contractor's reaction and auditor's response, if applicable.	
7. Complete the administrative working papers.	
8. Update the permanent files.	
9. Submit the working paper package and draft report to the supervisor/manager for final review and processing.	