

Name of Consultant (A/E Firm):	<input style="width: 95%;" type="text"/>
Name of CPA Firm/Auditor:	<input style="width: 95%;" type="text"/>
Name of DOT Reviewer:	<input style="width: 95%;" type="text"/>
Date(s) of DOT Review:	<input style="width: 95%;" type="text"/>

Background and Objectives

Independent CPAs perform audits of engineering consultants' Statements of Direct Labor, Fringe Benefits, and General Overhead (indirect cost rate schedules) to ensure compliance with Generally Accepted Accounting Principles (GAAP), Part 31 of the Federal Acquisition Regulation (FAR), and, to the extent applicable, the Cost Accounting Standards (CAS) of 48 CFR subpart 9900. In turn, State DOT auditors review the CPAs' work to determine whether the indirect cost rates and Facilities Capital Cost of Money (FCCM) rates certified by the CPAs should be accepted by DOTs for purposes of cost reimbursement and project cost estimates.

This Review Program was designed to provide State Department of Transportation (State DOT) auditors with a framework to provide consistency in—

- Evaluating the CPA's familiarity and compliance with the Government Auditing Standards (GAGAS), Generally Accepted Auditing Standards (GAAS), GAAP, 23 U.S.C. 112(b)(2), 23 CFR 172, FAR Part 31, and interpretive guidance such as the DCAA Contract Audit Manual (CAM) and the AASHTO Uniform Audit and Accounting Guide (AASHTO Guide).
- Determining whether the CPA's workpapers support the opinions stated in the Audit Report regarding the engineering consultant's—
 - job-cost accounting and estimating systems;
 - indirect cost rate schedule;
 - internal control structure;
 - compliance with the applicable laws, regulations, and guidance; and
 - identification and segregation of field office costs.
- Verifying the adequacy of the sampling procedures used by the CPA.
- Ensuring the CPA presented the audit findings and the Audit Report to the engineering consultant.
- Ensuring that the CPA's audit adjustments agree to the adjustments listed on the final, audited indirect cost rate schedule submitted to State DOTs.

Note 1: Although this Program was developed primarily for use by State DOT auditors, independent CPAs are encouraged to use the Program as an outline, or checklist, to ensure that sufficient evidence is gathered and maintained in the audit workpapers to support audit conclusions.

Note 2: The foregoing list of objectives was designed to determine whether the CPA's workpapers support various elements of the engineering consultant's financial systems, such as the job-cost accounting and estimating systems. However, it should be noted that the CPA only is required to provide an opinion on the indirect cost rate schedule and to issue a report on internal controls over financial reporting and compliance as required by GAGAS.

State DOT reviewers should complete this Review Program as completely as possible; accordingly, workpaper references and supplemental explanations/narratives should be included in all areas, as appropriate, to support the conclusions reached. This is especially important when the Review Program is used in conjunction with a State DOT's cognizant review of a CPA's FAR audit report.

When completing the electronic version of this document, a [Keyword Index](#) may be accessed with a [CTRL+Click](#) in all places where the following link appears: [\[KEYWORD INDEX\]](#). Links to the index are also embedded in each of the section headings and subheadings (e.g., I., I.A, I.B, etc.).

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REVIEW PROGRAM FOR CPA AUDITS OF CONSULTING ENGINEERS' INDIRECT COST RATES	
I. PREPARATORY WORK FOR DOT REVIEWER.	
Completed? [KEYWORD INDEX]	
I.A.	<u>CURRENT INDIRECT COST RATE SCHEDULE.</u> Obtain the indirect cost rate schedule for the engineering consultant's most recently completed fiscal year.
I.B.	<u>INDIRECT COST RATE SCHEDULES FROM PRIOR YEARS.</u> Obtain previous year(s) indirect cost rate schedule(s).
I.C.	<u>ANALYTICAL PROCEDURES.</u> Compare indirect cost rate schedules for consistency of amounts, rates, and allocations to home office and field offices.
I.D.	<u>GENERAL PURPOSE FINANCIAL STATEMENTS.</u> Obtain copy of general purpose financial statements for the period being reviewed, if available, and/or Form 10K for publicly-traded companies (many times this can be obtained from the company's website). Review of the financial statements may provide additional information regarding related party transactions, acquisition of another firm(s) or other organizational changes, and other information that could be used during the review of the CPA's Audit Report.
I.E.	<u>CPA-CLIENT RELATIONSHIP.</u> Evaluate the length of time there has been a business relationship between the CPA and engineering consultant and whether the CPA has a close relationship with any of the consultant's management or other personnel. (In accordance with GAGAS 3.14.d and 3.16, the CPA should employ safeguards to either eliminate threats of independence or reduce them to an acceptable level.)

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II. GAGAS GENERAL STANDARDS.		Attribute Met? [KEYWORD INDEX]	CPA Workpaper Reference (or Comment)
II.A.	<u>PEER REVIEW REPORT.</u> Review the CPA’s most recent Peer Review Report. Did the CPA receive a Peer Review Rating of Pass (GAGAS 3.101)? If not, document the comments of the peer reviewer(s), obtain a copy of the corrective action plan, and note any possible impairment(s) to the audit work performed.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
II.B.	<u>CPE.</u> Did the CPA meet the minimum Yellow Book requirements for CPE credit per GAGAS 3.76? Review the earned CPE hours and course listing for each individual CPA who worked on the assignment: <ul style="list-style-type: none"> • 80 hours CPE over 2 years • 24 hours in government auditing or government environment 	<input type="checkbox"/> Yes <input type="checkbox"/> No	
II.C.	<u>INDEPENDENCE.</u> Did it appear that the CPA was free from personal, external, and organizational impairments to independence, and did the CPA avoid the appearance of such impairments to independence (GAGAS 3.02 through 3.30)?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
II.D.	<u>PEER REVIEW REPORT.</u> (Answer “yes” or “no,” based on overall conclusion.) Did the staff assigned to conduct the audit collectively possess adequate professional competence for the tasks required (GAGAS 3.69 through 3.75)? Determine the sufficiency of CPA firm’s knowledge of applicable audit criteria, such as the following: <ul style="list-style-type: none"> • Were staff members assigned to the audit proficient with the FAR? • Were assigned staff members knowledgeable of the AASHTO Guide and other relevant guidance (e.g., the DCAA CAM and/or supplemental materials issued by State DOTs?) • Have assigned staff members received specific training in relevant subjects? • Has the firm had recent experience in conducting FAR audits? • Have any State DOTs already reviewed any of the CPA’s audits of other consulting firms? If “yes,” the DOT reviewer should contact those states to see if they identified any problems with the CPA’s work. 	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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III. GAGAS FIELD WORK STANDARDS.		Attribute Met? [KEYWORD INDEX]	Workpaper Reference (or Comment)
III.A.	<p><u>PLANNING.</u> (Answer “yes” or “no,” based on overall conclusion.) Is there evidence that the audit work was properly planned to:</p> <ul style="list-style-type: none"> • Determine the nature timing and extent of auditing procedures; • Consider fraud and illegal acts; • Consider materiality; • Evaluate previous audits; and • Assess risk? 	<input type="checkbox"/> Yes <input type="checkbox"/> No	
III.B.	<p><u>ENGAGEMENT LETTER.</u> Did the audit contract, engagement letter, or agreement include the following? (Answer “yes” or “no,” based on overall conclusion.)</p> <ul style="list-style-type: none"> • The period to be covered, • The cost pools to be audited, • The reports to be prepared, • That representatives of State agencies and other applicable Government audit staff shall have access to the audit documentation upon request and in a timely manner (GAGAS 4.16), • That working papers be maintained for at least three years after the date of the report, • Any restrictions or special conditions, and • Citations to the Audit Guide and other relevant standards and/or regulations to be followed (e.g., GAGAS, GAAS, and FAR Part 31)? 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
III.C.	<p><u>PRIOR FINDINGS.</u> Did the CPA follow up on known material findings and recommendations from prior audits (GAGAS 4.05)?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

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III. GAGAS FIELD WORK STANDARDS.		Attribute Met? [KEYWORD INDEX]	Workpaper Reference (or Comment)
III.D.	<p><u>QUALITY OF AUDIT DOCUMENTATION.</u> Did the audit documentation (GAGAS 4.15 and 5.16) provide adequate evidence of the following?</p> <ul style="list-style-type: none"> • Overall, there was sufficient detail to provide a clear understanding of the CPA’s work (additional detail, supplementary, or oral explanations should not be necessary); • The audit evidence obtained included its source, descriptions of transactions and records examined, and the conclusions reached; • The documentation provided sufficient detail to enable an experienced auditor, having no previous connection to the audit, to understand— <ul style="list-style-type: none"> – the nature, timing, and extent of auditing procedures performed to comply with Yellow Book and other applicable standards and requirements; – the results of the audit procedures performed and the audit evidence obtained; – the conclusions reached on significant matters; and – the accounting records agree or reconcile with the audited financial statements or other audited information. • The documentation provided evidence of supervisory review of the work performed (GAGAS 4.15). 	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p> <p><input type="checkbox"/>Yes <input type="checkbox"/>No</p> <p><input type="checkbox"/>Yes <input type="checkbox"/>No</p> <p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>	

IV. FORMAT AND CONTENTS OF AUDIT REPORT.		Attribute Met? [KEYWORD INDEX]	Workpaper Reference (or Comment)
IV.A.	<p><u>AUDIT OPINION.</u> Did the report contain an opinion stating that the audited indirect cost rate schedule was fairly presented in accordance with applicable Federal laws and regulations?</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>	
IV.B.	<p><u>SCOPE.</u> Did the report contain a scope paragraph stating that the audit was performed in accordance with Yellow Book standards?</p>	<p><input type="checkbox"/>Yes <input type="checkbox"/>No</p>	

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IV. FORMAT AND CONTENTS OF AUDIT REPORT.		Attribute Met? [KEYWORD INDEX]	Workpaper Reference (or Comment)
IV.C.	<p><u>BASIS FOR DETERMINING ELIGIBLE/ALLOWABLE COSTS.</u> Did the scope paragraph state that the CPA used FAR Part 31 as the primary basis for determining costs eligible for reimbursement under Government contracts?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
IV.D.	<p><u>REPORT ON INTERNAL CONTROLS.</u> Did the CPA issue a report on the Internal Control and Compliance with Laws, Regulations, and Provisions of Contracts or Grant Agreements as required by Government Auditing Standards (GAGAS 4.19 - 4.22)?</p> <p>– If “yes,” were all significant deficiencies and material weaknesses in the internal control that were found by the auditor disclosed in the auditor’s report? (GAGAS 4.23 - 4.39)</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
IV.E.	<p><u>COMMUNICATION OF RESULTS OF AUDIT.</u> Review the procedures used by the CPA to communicate the results of the audit and deficiencies in internal controls to the engineering consultant (GAGAS 4.23 - 4.29). Were the procedures adequate?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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IV. FORMAT AND CONTENTS OF AUDIT REPORT.		Attribute Met? [KEYWORD INDEX]	Workpaper Reference (or Comment)
IV.F.	<p><u>DISCLOSURE NOTES.</u> (Answer “yes” or “no,” based on overall conclusion.) Were the Disclosure Notes to the Report Adequate? (See AASHTO Guide, Chapter 11, which discusses Audit Reports and Minimum Disclosures.)</p> <p>At a minimum, the following should have been disclosed (if applicable):</p> <ul style="list-style-type: none"> • Description of the Company (11.4.A) • Basis of Accounting (11.4.B) • Description of Accounting Policies, including Cost Allocation Policies (11.4.C). • Description of Overhead Rate Structure (11.4.D). <ul style="list-style-type: none"> - Reporting unit; - Single base or multiple bases, and how the base(s) is (are) applied. • Description of Labor Related Costs (11.4.E). Such as: <ul style="list-style-type: none"> - Policies regarding the allocation of project labor (e.g., actual vs. standard hourly rates and, if applicable, how and when are variances computed and recorded); - Contract/Purchased Labor; - Paid Time Off; - Paid Overtime & Uncompensated Overtime (e.g., how is overtime premium treated, and how does the company account of uncompensated overtime), Executive Compensation Analysis, Pension/Deferred Compensation, and Employee Stock Option Plans. • Description of Depreciation and Leasing Policies (11.4.F) • Description of Related-Party Transactions (11.4.G) • Facilities Capital Cost of Money (FCCM) (11.4.H) • List of Direct Cost Accounts (11.4.I). <ul style="list-style-type: none"> - Were direct costs consistently allocated to cost objectives/projects? - Were individual charge-rates (if applicable) listed, along with along with a general description of the audit procedures used to verify the accuracy of the rates? • Management’s Evaluation of Subsequent Events (11.4.J). Was a statement included noting that the company has adequately considered the effect of subsequent events up to the date the indirect cost rate schedule was issued? 	<input type="checkbox"/> Yes <input type="checkbox"/> No	
IV.G.	<p><u>ELEMENTS OF AUDIT REPORT.</u> Did the CPA’s Audit Report contain a list of costs submitted by the engineering consultant, adjustments and allowed costs per audit, explanations of the adjustments, and FAR references for the adjustments made?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

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V. REVIEW OF CPA'S AUDIT TESTING (Application of GAGAS, FAR Part 31, and relevant Cost Accounting Standards (48 CFR Chapter 99))		Attribute Met? [KEYWORD INDEX]	Workpaper Reference (or Comment)
V.A.1	<p><u>GENERAL LEDGER</u>. (Answer “yes” or “no,” based on overall conclusion.)</p> <p>Did the CPA review the accounting system to determine if the system was adequate to segregate and accumulate reasonable, allocable, and allowable costs?</p> <ul style="list-style-type: none"> Evaluate the testing used by the CPA to verify the accuracy of costs in the general ledger, associated subsidiary ledgers, and related documents or systems. (Assess if testing was sufficient to support the CPA’s conclusions—consider additional sample testing, if necessary). Was there evidence that costs in the general ledger were properly classified? Did the general ledger contain separate accounts for segregating FAR-unallowable costs? If not, were unallowable costs otherwise identified or estimated? Review, evaluate, and document how the unallowable costs were determined. Review the CPA’s documentation of tests and conclusions. 	<input type="checkbox"/> Yes <input type="checkbox"/> No	
V.A.2	<p><u>GENERAL LEDGER (continued)</u>. (Answer “yes” or “no,” based on overall conclusion.)</p> <p>If the engineering consultant used statistical sampling as a basis to estimate unallowable costs, was a proper statistical sampling method used as required by FAR 31.201-6(c)(2)? Specifically:</p> <ul style="list-style-type: none"> The sampling method must result in an unbiased sample that is a reasonable representation of the sampling universe; Any large dollar value or high risk transaction must be separately reviewed for unallowable costs and must be excluded from the sampling process; and The sampling method must permit audit verification. Did the engineering consultant enter into an appropriate advance agreement with its cognizant State DOT to allow for such sampling and estimation as discussed in FAR 31.201-6(c)(4)? 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

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<p>V.B. LABOR ACCOUNTING SYSTEM. (See AASHTO Guide, Chapters 6 and 10.) Did the CPA's workpapers contain evidence that the engineering consultant's labor-charging/timekeeping system was determined to be complete and sufficiently detailed to allow for a proper determination of the consultant's direct labor base and indirect labor costs, including the allowability of such costs? Specifically—</p> <ul style="list-style-type: none"> • Was there evidence that the consultant accounted for all hours worked by all employees, including salaried employees and principals? • Was there evidence that indirect labor was recorded on timesheets in sufficient detail to allow for a determination of labor relating to FAR-governed costs, including marketing/promotional, direct selling, bid and proposal, training, reorganization, and other administrative tasks? • Were the labor costs per the indirect cost rate schedule reconciled to total labor costs per payroll tax returns (941s), the general ledger/financial statement, and the labor distribution system/summary? • Was there a labor distribution analysis—a review of hours and rates per the labor distribution reports and comparison to employee timesheets and payroll register or other payroll records? • Was there a review of uncompensated overtime? (FAR 52.237-10 defines uncompensated overtime as "hours worked without additional compensation in excess of an average of 40 hours per week by direct charge employees who are exempt from the Fair Labor Standards Act. Compensated personal absences such as holidays, vacations, and sick leave must be included in the normal work week for purposes of computing uncompensated overtime hours.") 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>V.B. (cont.)</p>	<p><u>LABOR ACCOUNTING SYSTEM (cont.)</u> [KEYWORD INDEX] (See AASHTO Guide, Chapters 6 and 10.)</p> <ul style="list-style-type: none"> • If the consultant used a standard costing system, was there evidence that the consultant properly accumulated and disposed of variances? • Was there evidence that the consultant accounted for the premium portion of overtime on a consistent basis? • Was there evidence that the consultant consistently and properly accounted for project-related purchased/temporary labor? • Did the CPA's workpapers contain evidence that a minimum labor sample size of 26 timesheets¹ were chosen for testing across an appropriate mix of direct-charge employees, including supervisors and/or project managers? Alternatively, did the CPA's workpapers for labor testing document the size of the labor population and the conclusions drawn from the risk assessment to determine if a larger sample size was warranted beyond the minimum sample size? 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
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¹ Generally, the testing should include all the time transactions (each increment of time allocated to a direct or indirect project or cost pool) from the sampled timesheets.

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<p>V.C. PROJECT-COSTING/JOB-COSTING SYSTEM. Was there evidence that the project costing system accounted for all direct costs (direct labor and other costs that can be identified specifically with a project or final cost objective), on a proper, complete, and consistent basis?</p> <ul style="list-style-type: none"> • Did costs contained in the project costing system integrate with, or otherwise reconcile to, financial accounting system control accounts (general ledger accounts)? • Was there evidence that the consultant properly recorded all direct labor to projects, including non-billable labor identified with projects? • Was there evidence that the consultant recorded labor costs at properly developed labor rates for both salaried and non-salaried employees? For example, did the CPA pay specific attention to the accuracy of labor rates for salaried employees who incur overtime and work in both direct and indirect functions? • Was there evidence that the consultant recorded all Other Direct Costs, whether billable or not, to projects on a consistent basis? Were the components of such costs segregated from general overhead? • Did the workpapers address costs that the consultant treated as direct costs and billed, but also included in the indirect cost pool? If so: <ul style="list-style-type: none"> – Were recoveries associated with these costs credited to the indirect cost pool in accordance with FAR 31.201-5? – The netting of direct costs included in the indirect cost pool and billed amounts (on a basis other than cost) in this instance may yield an inaccurate representation of costs. Did the workpapers address the acceptability of this alternative methodology? 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	

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<p>V.D. <u>DIRECT COSTS/VERIFICATION OF COMPANY IN-HOUSE RATES AND DIRECT BILLINGS.</u> Did the CPA's workpapers include evidence of the following?</p> <p>The consultant submitted a list of direct cost accounts and amounts for the CPA's review.</p> <ul style="list-style-type: none"> • The CPA reviewed the consultant's direct cost accounts for consistency. • The CPA ensured that all direct costs were removed from the indirect cost pool. • The CPA reviewed the consultant's in-house billing rates to ensure: <ul style="list-style-type: none"> – Total usage (direct and indirect) was included in the denominator? – If expenses associated with the development of the rate(s) were accumulated in the indirect cost pool, the indirect cost pool was reduced by the amount of direct usage? – If the expenses were accumulated in separate clearing account(s), the indirect cost pool included only indirect usage? • Did the CPA audit the in-house billing rates, compare the audited in-house rates to the billing rates, and revise as necessary (e.g., CADD and in-house reproductions)? • Did the CPA verify billings on other projects on a sample basis? (If a State project was tested, note project number and amount for information.) Did the CPA performed reconciliations of: <ul style="list-style-type: none"> – Hours charged on billings to timesheets, – Hourly rates billed to actual rates, and – Hourly rates billed to contract maximums? 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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<p>V.E. COST POOLING AND ALLOCATION METHODOLOGIES. (Answer "yes" or "no," based on overall conclusion.)</p> <p>Did the CPA's workpapers include evidence that costs were properly and consistently pooled and allocated to intermediate and final cost objectives?</p> <ul style="list-style-type: none"> • Was there evidence that the CPA addressed the propriety of the methodology used by the engineering consultant in allocating costs contained in intermediate cost pools (e.g., corporate expenses, fringe benefits, general and administrative, and service specific overheads) to the final indirect cost rate(s)? • Specifically, did the CPA firm evaluate the homogeneity of the cost pools and the relationship to the allocators used? Did the CPA conclude that the methodology resulted in an allocation of costs in relation to the benefits accrued by the cost objectives? • If the consultant developed indirect costs rates for more than one region, reporting unit, or engineering discipline, did the CPA address the propriety of the cost pooling and cost allocation methodologies used? • For Other Direct Costs that were internally-generated, did the CPA determine that related costs were properly segregated from the general cost pool and were allocated to projects on a consistent basis? • For Other Direct Costs that were internally-generated, accumulated in separate cost pools, and allocated based on individual charge rates, did the CPA determine that the consultant properly adjusted for/resolved material year-end variances resulting from the over- or under-allocation of actual costs? • For internally-generated costs such as company-owned vehicles, were such costs accumulated in separate cost pools when such costs were material in amount and had a material impact on the firm's indirect cost rates (specifically when the firm has more than one overhead rate involving differentials in the amounts of service-specific vehicle usage)? 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	

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V.F.	<p><u>AUDIT TESTING, GENERALLY.</u></p> <ul style="list-style-type: none"> • Did the workpapers include evidence that the CPA determined that costs contained in the indirect cost rate schedule were supported by the underlying books and records, as summarized by financial statements, trial balances, tax returns (IRS Form 941s), and related schedules? • Did the workpapers document the identification of <i>large-dollar or sensitive</i> (LDS) transactions that were removed/stratified for complete examination, including verification (vouching) to source documents? (AASHTO Guide Chapter 10). • Did the workpapers document the sampling parameters used by the CPA if additional testing beyond the LDS items was warranted? (AASHTO Guide Chapter 10). 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	

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<p>V.G.1 (cont.)</p>	<ul style="list-style-type: none"> • Did the CPA: <ul style="list-style-type: none"> – Verify that the Consultant properly compared executive compensation amounts to the benchmarks discussed previously in Item 8? – Verify that the Consultant either: <ul style="list-style-type: none"> (a) used nationally-published salary survey data to prepare the analysis? Check here, if applicable: <input type="checkbox"/> <li style="text-align: center;">or (b) applied the applicable amount from the NCM? Check here, if applicable: <input type="checkbox"/> – Review the Consultant’s bonus/incentive compensation plan to ensure that objective, performance-based criteria were established, communicated to staff, and used in determining bonus amounts? – Review the Consultant’s bonus/incentive compensation plan to determine if any portion of the bonus paid was a constructive dividend or other distribution of profits? 	<p>[KEYWORD INDEX]</p> <p><input type="checkbox"/>Yes <input type="checkbox"/>No</p> <p><input type="checkbox"/>Yes <input type="checkbox"/>No</p> <p><input type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>N/A</p> <p><input type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>N/A</p>	
<p>V.G.2</p>	<p><u>SUPERIOR PERFORMANCE.</u> (Answer “yes” or “no,” based on overall conclusion.) If the Consultant claimed superior performance, did the CPA verify that the Consultant’s performance analysis complied with the procedures established in Chapter 7 of the AASHTO Guide?</p> <p>For example:</p> <ul style="list-style-type: none"> • Did the consultant apply three (or more) financial performance measures as detailed in Chapter 7 of the AASHTO Guide? • Did the consultant consistently use the same criteria from a prior year (if superior performance was claimed in the prior year)? • Did the consultant use proxy data available from valid sources using the prescribed criteria in Chapter 7 of the AASHTO Guide? • Did the consultant limit superior performance so as not to exceed the 75th percentile or the Federal Benchmark Compensation Amount (BCA)? 	<p><input type="checkbox"/>Yes <input type="checkbox"/>No <input type="checkbox"/>N/A</p>	

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<p>V.G.3</p>	<p><u>INDIRECT COST ACCOUNTS.</u> (See AASHTO Guide, Chapters 4, 5, 8, and 10.)</p> <p>(1) Did the CPA’s workpapers include the following?</p> <ul style="list-style-type: none"> • A risk assessment, including a list of accounts the CPA deemed immaterial and therefore did not review. • A listing of accounts reviewed with <u>analytical procedures</u> (e.g., ratio analysis, and year-over-year comparisons to measure recorded amounts against the auditor’s expectations/predictions). • A listing of accounts selected for <u>detailed testing</u>, using the large dollar or sensitive (LDS) criteria discussed in Chapter 10.2 of the AASHTO Guide. <p>(2) Did the CPA’s workpapers adequately address the <i>allowability</i> (including <i>reasonableness</i>) of indirect costs in accordance with the FAR 31.2 Cost Principles? Specifically, did the CPA perform the procedures to ensure that²:</p> <ul style="list-style-type: none"> • Payroll taxes reconciled to applicable tax returns. • The auditor adequately reviewed accounts with a high risk of potential misstatement. (*) <i>(The following 14 accounts/line items are excerpted from Section 10.4.B of the AASHTO Guide; however, the items tested by the CPA may vary, depending on the CPA’s risk assessment and application of professional judgment. If the CPA excluded any of these items from detailed testing, comment on the justification (if any) provided in the CPA’s workpapers for the deviation from the list of potential high-risk accounts.)</i> <p><u>Note 1:</u> <i>In accordance with Section 10.4 of the AASHTO Guide, all LDS items should be selected for detailed testing, and, in situations where the auditor determines that additional testing beyond the LDS items is required, an additional random sample of 2 to 20 items also should be tested in each high-risk account.)</i></p> <p>(*) In some cases, rather than commenting on the individual components of the CPA’s high-risk account testing below in 1 - 15, it may be more practical for the State DOT reviewer to prepare a summary narrative to describe the CPA’s indirect cost testing. In such cases, the review should mark “Yes” or “No” above (V.G.3(2), bullet 3), based on the reviewer’s overall conclusion, and the summary narrative should be attached to this Review Program as a separate workpaper.</p> <ol style="list-style-type: none"> 1. <u>PRINTING/REPRODUCTION.</u> All direct costs were consistently allocated to cost objectives/projects and properly removed from the indirect cost pool. 2. <u>DUES AND SUBSCRIPTIONS.</u> Costs removed for country club dues, Political Action Committee (PAC) contributions and other lobbying costs, scholarship donations, and non-business purchases. 3. <u>TRAVEL.</u> <ul style="list-style-type: none"> – All entertainment costs, alcoholic beverages, and personal charges were removed from the indirect cost pools (FAR 31.205-14 & -51). – Costs for personal usage of company cars were removed from the indirect cost pool (FAR 31.205-6(m)(2)). (This is required regardless of whether the costs were reported as 	<p>[KEYWORD INDEX]</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes (*) <input type="checkbox"/> No (*)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>(*)</p>
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² Although the following cost items will not necessarily constitute high-risk areas in all engagements, the auditor should consider the following factors in deciding which accounts to examine in detail. The auditor should expand or reduce the list, as appropriate for each engagement. The State DOT reviewer should review the auditor’s risk assessment general testing approach to ensure the following factors were adequately considered.

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<p>V.G.3 (cont.)</p>	<p>taxable income to the employees.)</p> <ul style="list-style-type: none"> - Travel costs complied with the limits set by 41 CFR Chapters 300 – 304, the Federal Travel Regulation (as incorporated in FAR 31.205-46). - The consultant treated direct travel costs consistently, regardless of contract type or customer, and these costs were not duplicated in any indirect cost pool (FAR 31.202(a) & 31.203(b)). <p>4. <u>SEMINARS AND CONVENTIONS</u>. Costs removed for sponsorships, golf fees, door prize donations, entertainment, and booth rental costs.</p> <p>5. <u>INSURANCE</u>.</p> <ul style="list-style-type: none"> - Premiums were allocable to period covered by the indirect cost rate schedule being audited. - Group insurance was reviewed in accordance with FAR 31.205-19. - Self-insurance was reviewed for compliance with FAR 31.205-19. - Life insurance for key personnel (e.g., owners/principals and related parties) reviewed for compliance with FAR 31.205-19 (allowable only to the extent the premiums represent additional compensation; costs unallowable if the company is the beneficiary). - Review to ensure professional liability insurance expense does not include settlement costs, costs to correct defects in design, etc. <p>6. <u>PROFESSIONAL AND CONSULTANT SERVICE COSTS</u>.</p> <ul style="list-style-type: none"> - Organization and reorganization costs (FAR 31.205-27), bad debt collections (FAR 31.205-3), and costs associated with other unallowable, related activities were properly disallowed. - Costs for services provided were accompanied by adequate billing detail. - Retainer fees (FAR 31.205-33) reviewed to ensure services provided were necessary and customary, sufficient detail was provided by service provider, and unallowable activities were identified and disallowed. <p>7. <u>RENT</u>.</p> <ul style="list-style-type: none"> - Facilities/real estate and personal property costs were reviewed for common control, and the Consultant properly limited expenses for controlled assets to the allowable cost of ownership as discussed in FAR 31.205-36. - Leases reviewed to ensure that only costs for business-use assets were claimed on the indirect cost rate schedule. - Costs associated with sublet, idle, or otherwise unallocable space were identified and disallowed (FAR 31.205-17). <p>8. <u>DEPRECIATION</u>.</p> <ul style="list-style-type: none"> - The amount on the indirect cost rate schedule was properly limited to the amount used for financial reporting purposes (no section 179 write-offs or special tax depreciation are permitted). - The depreciation amount was net of personal-use (nonbusiness) assets and assets that are not allocable to the consultant's A/E business. 	<p><u>KEYWORD INDEX</u></p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>	
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<p>V.G.3 (cont.)</p>	<ul style="list-style-type: none"> - Costs for luxury vehicles should be reviewed for reasonableness (FAR 31.205-3). - Depreciation should be computed consistently from year to year across all departments and business segments (FAR 31.205-11). <p>9. <u>EMPLOYEE MORALE AND RELATED COSTS</u>. Reviewed for unallowable entertainment costs per FAR 31.205-14 (e.g., parties, picnics, outings, and sporting events); unallowable gifts; and other allowable costs per FAR 31.205-13. See also DCAA CAM Sections 7-2103(e)(3) & (4).</p> <p>10. <u>ACCOUNTS TITLED "MISCELLANEOUS EXPENSE," "OTHER INDIRECT COSTS," "GENERAL OFFICE," OR SIMILAR TITLES</u>. Reviewed for allocability, reasonableness, business purpose, direct costs, etc.</p> <p>11. <u>SUBCONTRACTORS/OUTSIDE CONSULTANTS</u>. Reviewed for proper segregation between direct and indirect, business purpose and allowability of activities performed, and reasonableness.</p> <p>12. <u>OTHER/MISCELLANEOUS INCOME</u>. Reviewed for any amounts that should be credited to an indirect cost account.</p> <p>13. <u>GAINS ON SALE OF ASSETS</u>. Reviewed for proper credit on gains on sale of assets originally presented as part of the depreciation expense cost.</p> <p>14. <u>LOSSES ON SALE OF ASSETS</u>. Reviewed to ensure reporting within the year the transaction occurred, appropriate calculation, appropriate application of credit or charge to the cost grouping(s) in which the depreciation or amortization was originally posted, and appropriate posting of cash awards.</p> <p>15. <u>OTHER ACCOUNTS REVIEWED</u>. List any other accounts or lines items the CPA tested in detail. Describe the procedures performed and the CPA's conclusions.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>[KEYWORD INDEX] <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p><input type="checkbox"/> N/A</p>	
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V. REVIEW OF CPA'S AUDIT TESTING (Application of GAGAS, FAR Part 31, and relevant Cost Accounting Standards (48 CFR Chapter 99))		Attribute Met? [KEYWORD INDEX]	Workpaper Reference (or Comment)
V.H.	<p><u>ALLOCATION BASE USED FOR INDIRECT-COST RATE COMPUTATION.</u> Did the cost base used to compute the overhead rate consist only of direct labor (e.g., the base excluded fringe benefits, and/or general and administrative costs)?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
V.I.	<p><u>FIELD RATE ACCOUNTING.</u> Did the indirect cost rate schedule include the calculation of a field rate? (See Chapter 5 of the AASHTO Guide.) If so, ensure that the Consultant considered the following factors in computing the field rate:</p> <ul style="list-style-type: none"> • Were costs that were allocable to one cost pool properly included in that cost pool? • Were the following field allocation percentages properly computed? <ul style="list-style-type: none"> – Direct field labor to total direct labor. – Allocation of support service-space costs. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
V.J.	<p><u>ELEMENTS OF THE CPA WORKPAPERS/AUDIT PROGRAM.</u></p> <ul style="list-style-type: none"> • Was the CPA's audit program sufficiently detailed to support the audit conclusion? • Did the audit program contain references to the applicable Federal and state laws, regulations, guidance and standards (e.g., FAR Part 31, Government Auditing Standards, and Cost Accounting Standards)? • Were the summary or lead workpapers adequately indexed and cross-referenced to supporting workpapers (i.e., were the workpapers easy to follow)? • Did the CPA include narratives/notes in the workpapers that, when reviewed together with the audit program, adequately described the work performed? 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No	

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VI. Reviewer's Final Determination

[\[KEYWORD INDEX\]](#)

VI.A. EXIT CONFERENCE.

Discuss the results of the audit/review with the Consultant and the CPA. Obtain their concurrence and/or identify areas of disagreement. Ensure that the Consultant understands the results are preliminary and are subject to review. Document the exit conference thoroughly.

State DOT Workpaper Reference: _____

Comments:

VI.B. REVIEWER'S CONCLUSION STATEMENT.

Based upon the application and performance of the steps within this work program:

(1) The CPA's work demonstrated an: **Acceptable** level of compliance with FAR Part 31 and the AASHTO Audit Guide.

Unacceptable

(2) Should follow-up audit work be recommended? Yes No

If "yes," then describe any issues that warrant additional audit work:

VI.C. REVIEW MEMORANDUM. Issue review memorandum to Consultant incorporating above conclusion statement, observations, and recommendations.

State DOT Workpaper Reference: _____

VI.D. CONTACT INFORMATION. This CPA workpaper review program was completed and approved by—

State DOT Reviewer and Title: _____

Signature: _____

Date: _____

State DOT Supervisor and Title: _____

Signature: _____

Date: _____

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VII. Additional Notes

[\[KEYWORD INDEX\]](#)

VII.A. This section may be used to document additional details regarding the CPA's labor testing, indirect cost testing, and/or to compile notes for discussion with the CPA.

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