

## 2015 Recap—Top 5

Written by Nick Sanders  
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Apogee Consulting, Inc. published 112 blog articles in 2015. That's about one every three days (more or less). Some were more popular than others, as measured by the number of recorded "hits"—which are the number of times the article was clicked on. (That metric ignores the number of times the article was read from the site's "main page" but it's the closest thing we have to a popularity meter.)

Based on that metric, the most popular article was "DCAA Resources" followed closely by "Expressly Unallowable Costs". But as we've noted before, the metric is somewhat misleading, in that older articles have had more time to garner hits.

Last year, we listed our personal "Top 5" favorite articles. But in looking over this year's crop, what we see are *themes* rather than articles. We see a series of related articles that, when read together, provide analysis and (if you'll permit us) insight. Thus, this year we will list our Top 5 themes—themes that we believe captured the trends of the year and provided solid assessments of those trends.

They are, in no particular order—

1.

**"Goodbye DCAA"** — in which we reported on the lack of DCAA audit coverage being provided to non-DoD agencies (such as the Dept. of Energy and NASA). The articles started with noting that changes in the DCAA "risk-based" audit approach meant that a significant portion of contractors' annual proposals to establish final billing rates (also known as "incurred cost submissions") were no longer being audited by DCAA, and the non-DoD agencies didn't have a plan to address that shortfall. Later in the year, we addressed the FY 2016 National Defense Authorization Act (NDAA) and its prohibition on DCAA performing *any* audits for non-DoD agencies until the backlog of unaudited final billing rate proposals was reduced to a more manageable size. At this point, the non-DoD agencies are, essentially (though not completely), on their own with respect to audits of proposals, invoices, and the like. As far as we know, nobody has a plan covering how to replace the services DCAA formerly provided.

1.

**“No Innovation Here”** – in which we discussed the Pentagon’s expressed desire to regain its lead in technological innovation, and why we were so pessimistic that the kind of innovation that DoD leadership said it wanted was ever going to happen. We spoke publicly on the topic in April (at the BDO/PCI DCAA Executive Seminar in Tyson’s Corner) and we wrote many articles about it—culminating with our proposal for “achievable innovation” that laid-out several strategies that we thought might be feasible.

1.

**“Contractor B.S.”** – in which we discussed our thoughts on DoD’s management and oversight of contractor business systems. Some of the articles dealt with the DoD Inspector General’s criticism of DCMA; others dealt with the sheer unworkableness of the oversight regime. We spoke on the topic in November in front of government and private sector attorneys. At that forum, we called for a regime change, and we suggested that the American Bar Association sponsor a joint government/industry working group to design the “next generation” approach to contractor business system compliance. As of this date, we haven’t heard that anybody accepted our call to action....

1.

**“Double-Secret Audit Guidance”** – in which we discussed the startling lack of recently published DCAA audit guidance, and what that gap might mean. Readers responded and subsequently we learned that DCAA was issuing new audit guidance (via Memorandum for Regional Directors or MRDs). DCAA simply wasn’t choosing to publish the new audit guidance on its website anymore. Later in the series, we discovered that certain folks were able to access that secret audit guidance and were using it to drive a competitive advantage in the marketplace for consulting services. Thanks DCAA, for creating an unbalanced marketplace.

1.

**“CAS”** – in which we discussed the seemingly missing-in-action CAS Board, and how the CAS Board’s failure to make decisions and interpret its regulations actually affected multi-million dollar CAS-related litigation. This series of articles included a two-part discussion of the Raytheon Space and Airborne Systems business unit’s litigation at the ASBCA, and how the

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resulting decision clarified (for better or worse) how cost impacts related to changes in cost accounting practice were to be calculated.

So that was the year that was.

We did not link to the various articles discussed above. The website has a News Archive button over there on the left, and it takes you to a list of articles shown in chronological order by date of publication. You can configure the list to display anywhere from 5 to 100 articles at a time. You can even tell the archive to display *all* articles in one (very long) list—assuming you want to scroll through the more-than-900 articles we've published to date.