

CAS Board Meets! Has Agenda!

Written by Nick Sanders

Thursday, 29 November 2018 00:00

Recently we published some blog pieces that were mildly critical of the current CAS Board. One of our criticisms was about the lack of CASB transparency. In September, we wrote, “There is no coherent messaging, no overall communication strategy. Part of this obviously stems from the Trump Administration’s focus on things other than CAS (or even reform of CAS administration). But we suspect that the remainder of the gap comes from a loss of focus on transparency.”

Those articles about the CAS Board have proven to be among our most popular this year, as best we can tell. (It’s tough to separate the “hits” from bots or hack attempts from the legitimate downloads.) Which, of course, proves our point that people are getting desperate for news about what the CAS Board is up to. If the CAS Board was more forthcoming then people wouldn’t need to use our site for CAS-related news.

Now, we are not saying that members or staff of the CAS Board read our website. That would be ridiculous. And we are not saying that, even if somebody related to the CAS Board did read our site and heard our criticisms about the lack of transparency, they would care enough to do anything about those criticisms. We aren’t that full of ourselves. Really.

But what we are saying is that on November 23, 2018, the CAS Board [published](#) in the Federal Register its agenda for the next two meetings.

According to the Federal Register notice, the next two meetings of the CAS Board will be taking place 27 November 2018 and 24 January 2019. The notice is careful to point out that the same agenda will be used for both meetings, and that the meetings themselves are closed to the public.

The notice also stated that “The CAS Board will discuss its accomplishments and activities for FY 2019 in its annual report to Congress, which will be transmitted after the end of the fiscal year” (Presumably that’s the Government Fiscal Year (GFY), which ends 30 September. That statement implies that we should expect a FY 2018 annual report to Congress, covering “accomplishments and activities” for the GFY that ended 30 September 2018 sometime in the near future.

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The planned agenda for the next two meetings is deceptively simple. What makes the agenda deceptive is that the topics are really not simple at all: they are wickedly complex. The agenda includes:

1.

Review of Advanced Notice of Proposed Rulemaking (ANPR) for Pension Adjustments for Extraordinary Events. “The CAS Board contemplates it will also issue a Staff Discussion Paper (SDP), the first step of the four-step process, addressing fact-finding that was made by the working group and public outreach conducted subsequent to the issuance of the 2011 final rule to help inform the CAS Board in its deliberations.”

2.

Conformance of CAS to Generally Accepted Accounting Principles (GAAP). As part of this effort, the Board forewarns the public of at least two SDPs related to “conformance of CAS 404, Capitalization of Tangible Assets, and CAS 411, Accounting for Acquisition Costs of Material, to GAAP.”

3.

CAS Applicability Thresholds. The Board will discuss the Section 809 Panel’s recommendations to increase the thresholds at which CAS coverage applies.

4.

Review of Section 809 Panel Recommendation on Defense Cost Accounting Standards Board (Defense CAS Board). The Board will discuss the Section 809 Panel’s recommendations to eliminate the second (and superfluous) CAS Board by “repeal [of] the provisions in section 820 of the FY 2017 NDAA that created the Defense CAS Board.”

There you have it. The CAS Board is active and its members and staff want you to know they are active. Stay tuned for further developments, including Staff Discussion Papers (for which public input will be solicited) and for annual reports to Congress.