

Transparency and the DCAA

Written by Nick Sanders

Thursday, 14 February 2013 00:00



One of the Obama Administration's defining characteristics is its dedication to openness and transparency in Government. Don't take our word for it: here's what the Administration itself [has to say](#) about the subject.

We like the following phrases, cut-n-pasted from the Obama website (link above)—

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My Administration is committed to creating an unprecedented level of openness in Government. We will work together to ensure the public trust and establish a system of transparency, public participation, and collaboration.

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My Administration will take appropriate action, consistent with law and policy, to disclose information rapidly in forms that the public can readily find and use. Executive departments and agencies should harness new technologies to put information about their operations and decisions online and readily available to the public.

So why is the DCAA so reluctant to share its audit guidance with the public? Why is the DCAA

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so reluctant to share its audit guidance with the very contractors who need to understand what they need to do in order to facilitate DCAA audits?

We visited the DCAA website on February 11, 2013. We clicked on “Open Audit Guidance” to see what the latest information was. The latest Memo for Regional Directors (MRD) was dated November 20, 2012. That’s just about three full months ago.

Maybe the DCAA folks don’t have any new audit guidance to publish? Well, in that case, why did the top of the web page where the latest audit guidance is issued say “Open as of November 30, 2012”? In other words, the content is current as of three months ago and it hasn’t been updated since that time.

Is this a big deal? Well, no. Not if you are okay with contractors not fully understanding what the audit expectations are. If you don’t mind some fumbling about and the resulting audit delays, then we guess this is not such a big deal at all.

But if you are focused on issuing timely audit reports—and focused on holding contractors accountable for their responsiveness to your audit requests for information—then why in the world would you want to keep them in the dark about what the audit expectations are?

DCAA has two types of audit guidance: Releasable and Not Releasable. It’s not clear to us what the difference between the two types might be, or why certain audit guidance would not be releasable to the general public. Be that as it may, we cannot think of any good excuse for DCAA not to update its website timely, and provide contractors with information regarding changes to audit procedures and approach.

We believe that it’s time—past time—for DCAA to live up to the standards of openness and transparency established by the Commander-in-Chief.

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P.S. On February 13, 2013, the DCAA website was updated through January 31, 2013.