MEMORANDUM

DATE: March 31, 2015

TO: Jeffery M. Lupis, Director
Division of Acquisition and Cooperative Support (DACS)

FROM: Dr. Brett M. Baker
Assistant Inspector General for Audit


OIG Monitoring of Audit

To fulfill our monitoring responsibilities, the Office of Inspector General:

- Reviewed the approach and planning of the audit;
- Evaluated the qualifications and independence of the auditors;
- Monitored the progress of the audit at key points;
- Coordinated periodic meetings with DCAA and NSF officials as necessary to discuss audit progress, findings and recommendations;
- Reviewed the report prepared by DCAA; and
- Coordinated issuance of the report.

DCAA is responsible for the attached report on AURA and the conclusions expressed in that report.
We thank you and your staff for the assistance extended to us during the audit. If you have any questions about this report, please contact Jennifer Jenkins at (703) 292-4996 or David Willems at (703) 292-4979.

Attachments:

cc: Richard Buckius, OD
    Fae Korsmo, OD
    Ruth David, NSB
    Michael VanWoert, NSB
    Lawrence Rudolph, OGC
    Martha Rubenstein, BFA
    James Ulvestad, AST
    Matthew Hawkins, LFO
    Mary Santonastasso, DIAS
    Allison Lerner, OIG
Defense Contract Audit Agency

United States
Department of Defense

May 31, 2013

Independent Audit of Association of Universities for Research in Astronomy’s (AURA) Accounting System

AUDIT REPORT NO. 4301–2012B17740010
Audit Report No. 4301-2012B17740010

DEFENSE CONTRACT AUDIT AGENCY

PREPARED FOR: Audit Manager
National Science Foundation
Office of the Inspector General
ATTN: Mr. David Willems
4201 Wilson Boulevard
Arlington, VA 22230

PREPARED BY: DCAA Arizona Branch Office
2121 W. Chandler Boulevard, Suite 207
Chandler, AZ 85224-6459
Telephone No.
FAX No.
E-mail Address

REFERENCES: CSA No. AST-0415302
Relevant Dates: See Page 5

CONTRACTOR: Association of Universities for Research in Astronomy
950 N. Cherry Avenue
Tucson, AZ 85719

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Form 1408NP (Attachment)
Audit Report No. 4301-2012B17740010

SUBJECT OF AUDIT

As you requested on November 18, 2011, we examined Association of Universities for Research in Astronomy’s (AURA) corrective actions related to significant deficiencies in the design of the accounting system as reported in Audit Report No. 4301-2010B17740006 (revised) dated January 9, 2011. Those deficiencies resulted in noncompliance with the criteria set forth in 2 CFR Part 215 (OMB Circular A-110) and Form 1408NP, Preaward Survey for Non-Profit Organization’s Accounting System. By submitting a cost proposal to the Government, AURA asserts that its accounting system is acceptable to perform the prospective contract in accordance with the above CFR criteria.

AURA is responsible for correcting the reported significant deficiencies. Our responsibility is to express an opinion on the acceptability of the design of the accounting system for the award of a prospective contract based on our examination.

SCOPE OF AUDIT

We conducted our examination in accordance with Generally Accepted Government Auditing Standards (GAGAS), except DCAA does not currently have an external opinion on its quality control system as required by GAGAS. The most recent external quality control review opinion expired on August 26, 2009. GAGAS require that we plan and perform the examination to obtain reasonable assurance about whether the data and records examined are free of material misstatement. An examination includes:

- obtaining an understanding of the portions of the contractor’s internal controls relevant for accumulating costs under prospective Government contracts;
- examining, on a test basis, evidence supporting the ability of the design of AURA’s accounting system to meet the criteria set forth in 2 CFR Part 215 (OMB Circular A-110) and Form 1408NP, Preaward Survey for Non-Profit Organization’s Accounting System; and
- performing such other procedures as we considered necessary in the circumstances.

Our examination tested the contractor’s corrective action related to the previously reported significant deficiencies in the design of the contractor’s accounting system as required 2 CFR Part 215 (OMB Circular A-110) and the criteria in Form 1408NP.

The 2 CFR Part 215 and Form 1408NP requires the accounting system to be in accordance with generally accepted accounting principles and provide for:

1. Proper segregation of direct costs from indirect costs;
2. Identification and accumulation of direct costs by contract;
3. A logical and consistent method for the allocation of indirect costs to intermediate and final cost objectives;
4. Accumulation of costs under general ledger control;
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5. A timekeeping system that identifies employees' labor by intermediate or final cost objectives;
6. A labor distribution system that charges direct and indirect labor to the appropriate cost objectives;
7. Interim (at least monthly) determination of costs charged to a contract through routine posting of books of account;
8. Exclusion from costs charged to government contracts of amounts which are not allowable in terms of OMB Circular A-122, Attachment B, or other contract provisions;
9. Identification of costs by contract line item and by units (as if each unit or line item were a separate contract) if required by the proposed contract;
10. Designed to support the Cooperative Support Agreement (CSA) Award Specific Programmatic Terms and Conditions (PTC) reporting and review requirements;
11. Financial information as required by OMB Circular A-110, Financial Management Systems; and

We believe that our examination provides a reasonable basis for our opinion. We were not engaged to examine and report on the operating effectiveness of AURA’s internal controls, and accordingly, we express no opinion on operating effectiveness. Additionally, our examination does not provide a legal determination on whether the design of AURA’s accounting systems meets the criteria set for in 2 CFR Part 215 (OMB Circular A-110) and Form 1408NP.

Because of its inherent limitations, internal controls may not prevent or detect and correct misstatements. Also, projections of any evaluation of effectiveness to future periods are subject to the risk that controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies and procedures may deteriorate.

RESULTS OF AUDIT

In our opinion, AURA has effectively implemented corrective actions to correct the significant deficiencies in the design of the accounting system AURA reported in Audit Report number 4301-2010A17740006, dated January 9, 2011. Therefore, the contractor’s accounting system is suitably designed, in all material respects, for award of a prospective contract in accordance with the criteria contained in 2 CFR Part 215 (OMB Circular A-110). The accounting system is in operation. Based on our examination we determined AURA adequately accumulates, segregates, and reports the use of ARRA (American Recovery and Reinvestment Act) funds, and adequately monitors sub-awardees' compliance with 2 CFR 215 (accountability of contingency funds) reporting requirements, ARRA reporting requirements, and the terms and conditions of sub-awards. As requested, we have completed a Form 1408NP, Preaward Survey of Prospective Contractor Accounting System.
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Our examination was limited to the evaluation of previously reported deficiencies in the design of AURA’s accounting system.

We discussed the results of our examination with [redacted] in an exit conference held on May 21, 2013.
CONTRACTOR ORGANIZATION AND SYSTEMS

1. Contractor Organization

The Association of Universities for Research in Astronomy, Inc. (AURA) is a consortium of universities, and educational and other non-profit institutions, operating several astronomical observatories. AURA members include 32 U.S. institutions and 7 international affiliates. AURA has four operating segments. The Gemini Observatory is an international partnership to operate twin 8.1-meter telescopes on Hawaii's Mauna Kea and Chile's Cerro Pachon. The National Optical Astronomy Observatory (NOAO) operates telescopes located on Kitt Peak in Arizona and Cerro Tololo in Chile. NOAO also provides support for the Gemini Observatory. AURA operates NOAO for the National Science Foundation (NSF) under a cooperative agreement. The National Solar Observatory (NSO) provides observing facilities for use by the nation's solar and solar-terrestrial physics community. NSO conducts research at Sacramento Peak in New Mexico and at Kitt Peak in Arizona for the NSF under a cooperative agreement. The Space Telescope Science Institute (STScI) carries out the scientific mission of the Hubble Space Telescope. In addition, STScI is developing the Science and Operations Center for the James Webb Space Telescope (JWST), the successor to the Hubble. AURA manages STScI under contract with NASA. In 1999 AURA established the AURA Observatory Support Services (AOSS) to provide administrative and logistics support for AURA operations in Chile. AOSS is considered a service center in which its costs go directly to NOAO and NSO; it is not a segment of AURA.

2. Accounting System

AURA maintains its accounting system on the accrual system in accordance with GAAP. The contractor's accounting period is from October 1 through September 30.

3. Estimating System

We have not reviewed AURA's estimating system and related internal controls.
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DCAA PERSONNEL

Primary contacts regarding this audit:

Other contact regarding this audit report:

Arizona Branch Office

Arizona Branch Office

General information on audit matters is available at http://www.dcaa.mil/.

RELEVANT DATES

Request for Audit: NSF OIG – dated and received November 10, 2011

AUDIT REPORT AUTHORIZED BY:

Attachment:
Form 1408NP
Audit Report No. 4301-2012B17740010

AUDIT REPORT DISTRIBUTION

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National Science Foundation
Office of the Inspector General
ATTN: Mr. David Willems
4201 Wilson Boulevard
Arlington, VA 22230

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dwillems@nsf.gov
PREAMBULE

PREA
WARD SURVEY FOR ARIZONA BRANCH OFFICE DEFENSE CONTRACT AUDIT AGENCY

NON-PROFIT ORGANIZATION'S ACCOUNTING SYSTEM

PROSPECTIVE CONTRACTOR: Association of Universities for Research in Astronomy, Inc. (AURA)

SECTION 1 - RECOMMENDATION

1. CONTRACTOR'S ACCOUNTING SYSTEM IS ACCEPTABLE FOR AWARD OF PROSPECTIVE CONTRACT/GRANT.

X YES □ NO (Explain in 2. Narrative)

□ YES, WITH A RECOMMENDATION THAT A FOLLOW-ON ACCOUNTING SYSTEM REVIEW BE PERFORMED AFTER CONTRACT AWARD (Explain in 2. narrative)

2. NARRATIVE (Clarification of deficiencies, and other pertinent comments. (If additional space is required, continue on plain sheets of paper.)

See DCAA Audit Report No. 4301-2012B17740010, dated May 31, 2013 for information supporting this form.

3. SURVEY MADE BY

a. Signature and Office (Include typed or printed name)

b. Telephone No.

c. Date Signed

Arizona Branch Office

March 6, 2013

4. SURVEY REVIEWING OFFICIAL

a. Signature and Office (Include typed or printed name)

b. Telephone No.

c. Date Reviewed

(480) 384-8040

May 31, 2013

If continuation sheets attached - mark here
## SECTION II - EVALUATION CHECKLIST

MARK "X" IN THE APPROPRIATE COLUMN (Explain any deficiencies in SECTION I NARRATIVE)

<table>
<thead>
<tr>
<th></th>
<th>YES</th>
<th>NO</th>
<th>N/A</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. EXCEPT AS STATED IN SECTION I NARRATIVE, IS THE ACCOUNTING SYSTEM IN ACCORD WITH GENERALLY ACCEPTED ACCOUNTING PRINCIPLES APPLICABLE IN THE CIRCUMSTANCES?</td>
<td>X</td>
<td></td>
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<tr>
<td>2. ACCOUNTING SYSTEM PROVIDES FOR:</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>a. Proper segregation of direct costs from indirect costs. (Circular A-122, Attachment A)</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>b. Identification and accumulation of direct costs by contract. (Circular A-110, C.21b(1))</td>
<td>X</td>
<td></td>
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</tr>
<tr>
<td>c. Identification and segregation of ARRA (American Recovery and Reinvestment Act) funds and MREFC (Major Research Equipment and Facilities Construction) funds. (Recovery Act §1512)</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>d. A logical and consistent method for the allocation of indirect costs to intermediate and final cost objectives. (A contract is a final cost objective.) (Circular A-122, Attachment A)</td>
<td>X</td>
<td></td>
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</tr>
<tr>
<td>e. A timekeeping system that identifies employees' labor by intermediate or final cost objectives. (Circular A-122, Attachment B)</td>
<td>X</td>
<td></td>
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</tr>
<tr>
<td>f. A labor distribution system that charges direct and indirect labor to the appropriate cost objectives.</td>
<td>X</td>
<td></td>
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<tr>
<td>g. Interim (at least monthly) determination of costs charged to a contract through routine posting of books of account.</td>
<td>X</td>
<td></td>
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<tr>
<td>h. Exclusion from costs charged to government contracts of amounts which are not allowable in Circular A-122, Attachment B, or other contract provisions.</td>
<td>X</td>
<td></td>
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<tr>
<td>i. Identification of costs by contract line item and by units (as if each unit or line item were a separate contract) if required by the proposed contract/grant.</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>j. Designed to support the Cooperative Support Agreement (CSA) Award Specific Programmatic Terms and Conditions (PTC) reporting and review requirements.</td>
<td>X</td>
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<tr>
<td>3. ACCOUNTING SYSTEM PROVIDES FINANCIAL INFORMATION:</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>b. Required to support requests for reimbursement payments. (Circular A-110, C.22(e))</td>
<td>X</td>
<td></td>
<td></td>
</tr>
<tr>
<td>c. Required to support requests for advance payments. (Circular A-110, C.22(a)(b))</td>
<td>X</td>
<td></td>
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</tr>
<tr>
<td>4. IS THE ACCOUNTING SYSTEM DESIGNED, AND ARE THE RECORDS MAINTAINED IN SUCH A MANNER THAT ADEQUATE, RELIABLE DATA IS DEVELOPED FOR USE IN PRICING FOLLOW-ON ACQUISITIONS?</td>
<td>X</td>
<td></td>
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</tr>
<tr>
<td>5. IS THE ACCOUNTING SYSTEM CURRENTLY IN FULL OPERATION? (If not, describe in Section I, Narrative which portions are (I) in operation, (ii) set up, but not yet in operation, (iii) anticipated, or (iv) nonexistent</td>
<td>X</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>