OFFICE OF MANAGEMENT AND BUDGET

Office of Federal Procurement Policy

48 CFR Part 9903

Cost Accounting Standards Board; Revisions to the Cost Accounting Standards Board Disclosure Statement Form (CASB DS-1)

AGENCY: Cost Accounting Standards Board, Office of Federal Procurement Policy, OMB.

ACTION: Final rule.

SUMMARY: The Office of Federal Procurement Policy, Cost Accounting Standards Board (CASB), is revising its Disclosure Statement Form (CASB DS–1). Section 26(g)(1) of the Office of Federal Procurement Policy Act, 41 U.S.C. 422(g)(1), requires that the Board, when promulgating any new or revised Cost Accounting Standard, publish a final rule. This final rule incorporates an updated and revised CASB Disclosure Statement developed by the Board.

EFFECTIVE DATE: February 28, 1996. **FOR FURTHER INFORMATION CONTACT:** Rein Abel, Director of Research, Cost Accounting Standards Board (telephone: 202–395–3254).

SUPPLEMENTARY INFORMATION:

A. Regulatory Process

The CASB's rules, regulations and Standards are codified at 48 CFR Chapter 99. Section 26(g)(1) of the Office of Federal Procurement Policy Act, 41 U.S.C. 422(g)(1), requires that the Board, prior to the establishment of any new or revised CAS, complete a prescribed rulemaking process. The process generally consists of the following four steps:

1. Consult with interested persons concerning the advantages, disadvantages and improvements anticipated in the pricing and administration of Government contracts as a result of the adoption of a proposed Standard.

2. Promulgate an Advance Notice of Proposed Rulemaking (ANPRM).

3. Promulgate a Notice of Proposed Rulemaking (NPRM).

4. Promulgate a final rule.

This promulgation completes the four step process.

B. Background

Prior Promulgations

The original Disclosure Statement Form (CASB DS-1) was developed and promulgated in the early 1970s. No revisions to the document were made until the Board was reestablished in 1990. In 1992, some minor revisions were made. 57 FR 14148, 14159 (April 17, 1992). Subsequently, a project was initiated to revise and update the Disclosure Statement (CASB DS-1).

On April 2, 1993, a Staff Discussion Paper incorporating a revised Disclosure Statement was distributed to certain interested parties who generally possessed actual field experience in submitting and auditing these Statements. On the basis of the comments received in response to this Staff Discussion Paper, an Advance Notice of Proposed Rulemaking (ANPRM) was developed and published in the Federal Register on April 4, 1994 (59 FR 15695).

The majority of the comments received in response to the ANPRM were generally supportive of the proposed approach, but at the same time, numerous revisions were suggested that were intended to improve and streamline the document. Many of these suggested revisions were incorporated in the Notice of Proposed Rulemaking (NPRM) that was published in the Federal Register on November 29, 1994 (59 FR 60948).

Public Comments

Nine sets of public comments were received in response to the NPRM from government contractors, industry associations and Federal agencies.

Most commenters acknowledged that the NPRM version of the DS-1 was a significant improvement as compared with the earlier versions of the Disclosure Statement. Nevertheless, numerous additional revisions were suggested by commenters in order to further simplify and streamline the DS-1. Of particular concern to several commenters was the amount and type of information needed to respond adequately to questions in Part VII of the Statement.

In general, the Board has tried to be responsive to the suggestions made by commenters. In particular, a careful reevaluation of Part VII has been undertaken. In reevaluating this Part, the instructions have been clarified to make clear that only relevant cost accounting practices and applicable identifying data need be disclosed. Therefore, numeric data representing accounting estimates is not required to be submitted. Also, in most sections of Part VII, the substantive questions have been limited to items that cover only 80-percent of the relevant cost groupings.

The commenters overall concerns and suggestions are addressed in greater detail under Section E., Public Comments.

The Board and the CASB staff express their appreciation for the constructive suggestions and criticisms provided by the commenters with regard to the content of the revised Disclosure Statement. Many of the commenters' suggested improvements have been incorporated into the final rule being promulgated today.

Benefits

After consideration of the public comments received, the Board believes that the revised Disclosure Statement, as set forth in this final rule, will improve the cost accounting practices followed by contractors when estimating, accumulating and reporting costs deemed allocable to Federal contracts. Adequate disclosure of cost accounting practices is essential in order to ensure consistency in cost measurement as costs are first estimated and then accumulated and reported. A Disclosure Statement that has not been updated for some two decades clearly cannot adequately reflect currently prevailing cost accounting practices and cost elements. Therefore, in order to ensure that the policies and Standards promulgated by the Board are implemented in an economical and effective manner, a revised and updated Disclosure Statement becomes essential. In addition, the Board has previously expressed the view that an updated Disclosure Statement should facilitate interaction between contractors and Government representatives when dealing with contract costing matters.

The introduction of the revised statement should not impose any new burden on contractors as it merely replaces an existing form which requires periodic updating of disclosed practices.

To further reduce the possibility of increased costs, the extended dates for submission of the new Disclosure Statement are designed to provide an opportunity to delay submission until such time as contractors would most likely have to file an updated disclosure form regardless of whether a new Disclosure Statement is introduced or not.

Summary of Amendments

The primary purpose of this revision of the Disclosure Statement is to bring it up to date and to improve it in light of two decades of field experience that the government procurement community has had with this document. The basic characteristics of the Disclosure Statement have not been changed. However, a multitude of specific changes are incorporated in the revised Statement. It would be impractical to list here all the specific

changes. However, most of these changes can be summarized as follows:

1. The current Disclosure Statement specifies that Parts I through VII be prepared at the segment or business unit level, while Part VIII should be prepared at the corporate or group headquarters level. This revised Statement provides that although Parts V, VI and VII still have to be submitted by segments, they may be completed either at the segment or headquarters level depending on where the applicable practices or procedures are established or where the cost is actually incurred.

2. In general, various legal references

have been updated.

- 3. As the original Disclosure Statement was in essence prepared before any Cost Accounting Standards were issued, the revised format includes references to subsequently issued Standards where appropriate. In this context, some cost accounting practices described in the original Disclosure Statement may not be in compliance with the relevant provisions of a Cost Accounting Standard. The purpose of the Disclosure Statement is not to elicit noncompliant answers, and therefore, any references to potentially noncompliant practices have been eliminated.
- 4. Requests for certain statistical data have been eliminated as this information is no longer used.
- 5. Certain new topical areas have been added to the Disclosure Statement. These cover items that have become important from a cost measurement perspective over the last two decades. The topical areas include cost-of-money, post-retirement health benefits and employee stock ownership plans. Most of these new topical areas are incorporated in a significantly revised Part VII.

C. Paperwork Reduction Act

The information collection aspects of this rule have been approved by the Office of Management and Budget, and assigned Control Number 0348–0051.

D. Executive Order 12866 and the Regulatory Flexibility Act

The economic impact of this final rule on contractors and subcontractors is expected to be minor. As a result, the Board has determined that this final rule does not result in the promulgation of a "major rule" under the provisions of Executive Order 12866, and that a regulatory impact analysis will not be required. Furthermore, this final rule does not have a significant effect on a substantial number of small entities because small businesses are exempt from the application of the Cost

Accounting Standards. Therefore, this rule does not require a regulatory flexibility analysis under the Regulatory Flexibility Act of 1980.

E. Public Comments

This final rule is based upon the NPRM published in the Federal Register on November 29, 1994 (59 FR 60948), wherein public comments were invited. Nine sets of comments were received from government contractors, industry associations and Federal agencies. The more significant comments received, and the Board's actions taken in response thereto, are summarized below. Many other comments that were more of an editorial nature have been incorporated in the document where appropriate.

Comment: Two commenters suggested that compliant as well as non-compliant cost accounting practices should be described in the Disclosure Statement.

Response: The Board agrees that the actual cost accounting practices being followed must be described. However, where the Disclosure Statement provides a list of alternative practices, only compliant alternatives will be listed. If the contractor's practice is not one of the listed alternatives, the actual practice must be described on a continuation sheet. This will not be tantamount to conceding that the practice is non-compliant since such a determination can only be made after appropriate analysis and review.

Comment: Several commenters indicated that although the NPRM has been significantly improved and streamlined, the draft still contains too many questions of a detailed nature that may, in the future, increase rather than decrease the opportunities for disputes.

Response: The Board has, once more, consulted with the respondents to the NPRM and all the concerns have been subjected to additional review. As a result, some changes have been made to the version incorporated in the NPRM that should contribute to further streamlining and clarification of the final document. This comment applies in particular to Part VII of the Disclosure Statement.

Comment: At least two commenters indicated that, in their opinion the revised document still contains too many pages.

Response: In the final format there is no substantial difference in the length of the original and the final Disclosure Statement.

Comment: One commenter stressed that whenever possible, existing CAS wording or definitions should be used.

Response: The Board agrees with this suggestion and, wherever appropriate,

the Disclosure Statement has accordingly been changed.

Comment: Several contractors indicated that throughout the document the term "CAS-covered contracts" rather than "Federal contracts" should be used.

Response: The Disclosure Statement deals with the cost accounting practices of an entity such as a segment or home office and it is presumed that cost accounting practices are applied consistently to all the applicable final cost objectives. Although the dollar amount of CAS-covered contracts received is crucial in determining whether a Disclosure Statement has to be filed, once the requirement to file has been met, the disclosure will cover all of the entity's policies and practices as they affect cost measurement and allocation to all contracts. Therefore, a broader term, such as "Federal contracts", seems preferable to a narrower term such as "CAS-covered contracts".

Comment: Two commenters suggested a shorter implementation period than the one proposed in the NPRM.

Response: While the Board encourages early adoption of the new form, it does not believe that it can adequately envision all the circumstances that might arise necessitating a delay in the introduction of the new form. It believes that any deadline imposed for the introduction of the new form should make ample provision for any unexpected difficulties that may arise at the implementation stage. Therefore, the final filing date for existing contractors has not been changed, although the Board hopes that an earlier adoption is possible in most cases.

Comment: Several commenters expressed some criticism of the procedure outlined in General Instructions that allows parts of contractors' accounting manuals to be incorporated by reference in the Disclosure Statement.

Response: The wording in the Instructions has been changed to make it clear that the procedure in question is an optional one—particularly from the perspective of the contractor.

Comment: Several commenters suggested that the language be clarified to indicate the appropriate circumstances in which home offices may be able to complete Parts V, VI, or VII to be filed by segments reporting to the home office.

Response: The language in the General Instructions has been clarified. In particular, it has been made clear that where the home office establishes the applicable cost accounting policies and

procedures, it may also complete the relevant Parts of the Disclosure Statement to be submitted by its subordinate segments.

Comment: Several commenters offered suggestions for clarifying the layout and terminology used on the Cover Sheet.

Response: Certain changes have been made to the Cover Sheet, in particular to item 0.2, Reporting Unit Classification, in order to introduce standard CAS terminology and definitions whenever appropriate.

Comment: Several commenters pointed out that in Part I, General Information, the wording of several items could be improved in order to ensure that the questions are more clearly focused and take into account current practices.

Response: Some changes have been made to Part I to reflect the suggestions made by several commenters. In particular, the question dealing with unallowable costs has been reformatted so as to reflect the basic structure of CAS 9904.405, Accounting for Unallowable Costs.

Comment: A number of comments were received concerning the formulation of questions in Part II, Direct Costs, dealing with direct material, direct labor and other direct costs. Some commenters suggested that the questions included in this part might be more appropriate elsewhere, such as in Part III, Direct vs. Indirect Costs, of the Disclosure Statement.

Response: The basic characteristic of Part II, as a section dealing with direct material, direct labor and other direct costs has been retained. The purpose here is to obtain information on how certain elements of cost are treated once it has been determined that they represent direct costs for government contract costing purposes. Therefore, items such as the question dealing with employee travel expenses that are directly charged to contracts have been retained.

On the other hand, as suggested by several commenters, the question dealing with interorganizational transfers has been eliminated primarily because it requested information about the cost accounting practices of the transferor and not of the transferee who is preparing the Disclosure Statement. It cannot be assumed that such information is always readily available to the transferee. The transferee's practices in this area are covered in Part IV, Indirect Costs.

Comment: A few commenters suggested that Part III should be drastically recast—including a suggestion that instead of long lists of

functions, elements of cost and transactions, the equivalent information should be described on a continuation sheet.

Response: The existing format has been retained as it seems to be the most effective way to obtain the relevant information on whether an item of cost is being treated as a direct cost, as an indirect cost or as a sometimes direct/sometimes indirect cost. The lists of functions, elements of cost and transactions have been somewhat modified on the basis of comments received.

Comment: In Part IV, several commenters pointed out that the subtitles used to describe various methods of allocating General and Administrative (G&A) expense did not properly reflect the requirements of CAS 9904.410, Allocation of Business Unit General and Administrative Expenses to Final Cost Objectives.

Response: The subtitles in question have been modified to conform more closely to the requirements of CAS 9904.410.

Comment: A number of commenters were concerned about the amount of detail required in Part IV dealing with modified allocations from indirect cost pools using a modified allocation base or a rate that is either more or less than the normal "full rate". Some commenters indicated that too much detail was requested regarding those modified allocations whereas others expressed the view that more information should be made available.

Response: Certain parts of Part IV, in particular the question dealing with the application of overhead and G&A rates to specified transactions or costs, have been restated in an attempt to present a more effective and balanced data gathering instrument. It should, once more, be remembered that the aim has been to provide a vehicle for a contractor to disclose its CAS compliant cost accounting practices. Therefore, the Disclosure Statement should not be regarded as a substitute for an audit check list. It is for this reason that noncompliant practices have been expressly excluded from the Disclosure Statement.

Comment: Several commenters suggested changes in the format in which questions regarding Independent Research and Development (IR&D) and Bid and Proposal (B&P) costs were presented in Part IV.

Response: The two questions that previously dealt separately with IR&D and B&P respectively have been combined to provide a more compact approach to the topic. In particular, the new approach, unlike the one in the NPRM, does not presuppose that every

contractor who incurs B&P expense also has incurred IR&D expense—a supposition that does not necessarily hold for civilian agencies.

Comment: One commenter suggested that the headings in the question in Part VI, Other Costs and Credits, dealing with charging and crediting vacation, holiday and sick pay be rearranged.

Response: The column headings have been changed to reflect the fact that salaried exempt and non-exempt employees (as defined by the Fair Labor Standards Act) are generally treated differently in this area.

Comment: Regarding Part VII, Deferred Compensation and Insurance Costs, most commenters representing contractors expressed the view that too much detailed and possibly superfluous and ambiguous information was required with respect to the various pension, post-retirement health, deferred compensation and insurance plans. One commenter had actually tested the proposed NPRM requirements by using actual plan data in completing selected parts of the various sections in Part VII. The estimated time to complete these various sections were clearly significant and possibly burdensome when extrapolated to cover the whole of Part VII. Even though the data submitted was not verified on an overall basis, it did provide valuable insight into the relative amount of time required to complete the various individual questions. The data also distinguished between time required on a "recurring" basis to keep the Disclosure Statement current, as contrasted with the initial effort of "non-recurring" time required to prepare the original submission. The general comments regarding time required to complete Part VII were frequently supplemented by specific suggestions regarding individual sections or questions.

Response: The Board is grateful to those commenters who spent significant amounts of time to prepare constructive comments on this part of the Disclosure Statement. In particular, the Board would like to express its gratitude to the commenter who actually completed sections of Part VII and made the relevant data available to the Board.

As a result of the input received from commenters, Part VII has been substantially redesigned in order to make it more "user friendly". When dealing with pension plans, post-retirement health benefits, employee group insurance, deferred compensation, and worker's compensation and property insurance, the amount of detailed information related to various aspects of cost measurement has been substantially

reduced. The detailed data is required only for those plans or policies that account for 80-percent of the relevant category of costs—provided data on at least three plans is disclosed. Only a limited amount of general plan information is sought for all the other plans. By excluding the less significant plans from the more detailed disclosure requirements, it is anticipated that the paperwork burden will be significantly eased.

Some commenters also inferred that in certain instances actual numeric data was requested that would have to be updated annually. It has been made clear in the final document that when dealing with such items as actuarial assumptions, only the basis used to determine numeric values need be disclosed and not the actual values themselves. This clarification should ensure that no regular annual updates of the Disclosure Statement are prepared and submitted merely to reflect changes in the relevant numeric values.

Other, more specific changes to the various sections of Part VII are summarized below:

Pension Plans. The number of General Plan Information questions has been reduced from nine in the NPRM to six in the final document.

In the NPRM, the information requested for Defined Contribution Plans applied to all plans of this type. In the final version, if there are more than three plans, this information has to be supplied only for plans that account for 80-percent of the defined contribution plan costs.

Defined Benefit Plans. The number of questions asked in this area has not been changed. However, the topics covered and the manner of presentation have been somewhat changed. In particular, it has been made clear that regarding actuarial assumptions, no disclosure of actual numeric values is required. Only the basis for determining these numeric values need be described.

Post-Retirement Benefits (PRBs). This section has been rearranged to conform with the pattern established for pension plans in the previous section. In the NPRM, the questions posed were applicable to all PRB plans. In the final rule, questions dealing with general plan information have been separated from questions dealing with more specific aspects of PRB cost determination. The latter group consists of five questions and they have to be completed only for those plans that, in the aggregate, account for at least 80percent of the total PRB costs. However, if there are three plans or less, then data on all the plans must be disclosed.

Employee Group Insurance Programs. Responses to this section of Part VII of the NPRM indicated that it was the most time consuming section to complete. Therefore, some significant changes have been made to the amount of information to be disclosed. First, if there are more than three policies or self-insurance plans, the applicable information should be provided only for those policies and self-insurance plans that, in the aggregate, account for at least 80-percent of the costs of the program for each category of insured risk. Second, the information previously requested under three separate questions has been recast as a single question in a tabular form. Third, a number of specific questions dealing with treatment of dividends, earned refunds, and employee contributions have been dropped as these items are largely covered by the provision of CAS 9904.416, Accounting for Insurance Costs. It is anticipated that the time needed to complete this section of Part VII will be significantly reduced as a result of the changes listed above.

Deferred Compensation Plans. This section has been recast to conform to the format used in the sections dealing with pension plans and PRBs. Therefore, the first five questions dealing with general plan information are applicable to all the plans. Two other questions, of a more substantive nature, should be completed for all the plans if there are no more than three plans. If there are more than three plans, the information should be provided for those plans that in the aggregate account for at least 80-percent of these deferred compensation costs

Employee Stock Ownership Plans (ESOPs). Questions in this section have been reformulated, and, as a result, the total number of these general plan information questions has been increased by two as compared with the NPRM. These questions must be completed for all ESOPs.

Worker's Compensation Liability and Property Insurance. This section has been rearranged to conform to the format used in dealing with employee group insurance plans. In addition, the term "line of insurance" has been introduced in an attempt to clarify the nature of the aggregation of costs for which the relevant cost data has to be disclosed. In this context, for the purpose of guidance, "line of insurance" has the meaning attributed to it in Generally Accepted Auditing Standards (GAAS) literature (see AICPA Audit and Accounting Guide, Audits of Property and Liability Insurance Companies) and includes groupings such as fire and similar perils, general

liability, marine perils, automobile liability and property damage, worker's compensation, theft, etc. If there are more than three policies or self-insurance plans, the applicable information should be provided only for those policies and plans that in the aggregate account for at least 80-percent of the applicable costs for a line of insurance. Also, two separate questions have been combined into a single question in a tabular form.

Comment: Several comments relating to Part VIII, Corporate or Group Expenses, dealt with the requirement in the NPRM to "list all active segments and groups that are material in size reporting to the home . . . office". Suggestions received included deletion of the words "all", "active", and "that are material in size" in the above quote from the first question in this part. At least one commenter suggested that if the term "material" is used, criteria for materiality should be developed.

Response: The suggestions regarding deletions have been accepted by the Board. The restated sentence reads: "list segments and other intermediate level home offices reporting to this home office."

The Board believes that this is an area where the individuals implementing the Standards and other regulations necessarily must exercise their own judgment in carrying out their tasks. The objective of this provision in the Disclosure Statement is to obtain a listing of segments and other entities to which home office expenses may be allocated. This allocation is part of the cost determination process for government contract costing purposes. Furthermore, this cost determination process, which includes all the relevant pronouncements of the Board, is subject to the materiality provisions of 9903.305. Specific reiteration of the materiality provision in each instance is not needed. Therefore, the requirement in the present instance is to list all the segments or other entities reporting to the home office that may have other than immaterial impact on the cost allocation process from the home office to its subordinate entities.

Comment: Several suggestions were received to improve and streamline the main section of Part VIII that deals with the pooling and allocation of home office expenses.

Response: Several of the suggestions received have been adopted. An addition has been made to the list of allocation base codes used and one question in the NPRM has been eliminated and its substance combined with another question.

List of Subjects in 48 CFR Part 9903

Cost accounting standards, Government procurement. Richard C. Loeb, Executive Secretary, Cost Accounting Standards Board.

For the reasons set forth in this preamble, chapter 99 of title 48 of the Code of Federal Regulations is amended as set forth below:

1. The authority citation for Part 9903 continues to read as follows:

Authority: Public Law 100–679, 102 Stat. 4056, 41 U.S.C. 422.

PART 9903—CONTRACT COVERAGE

Subpart 9903.2—CAS Program Requirements

2. Section 9903.202 is amended by deleting the illustrated CASB DS-1 and inserting a revised CASB DS-1.

BILLING CODE 3110-01-P

FORM APPROVED OMB NUMBER 0348-0051

COST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679

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GENERAL INSTRUCTIONS

- 1. This Disclosure Statement has been designed to meet the requirements of Public Law 100-679, and persons completing it are to describe the contractor and its contract cost accounting practices. For complete regulations, instructions and timing requirements concerning submission of the Disclosure Statement, refer to Section 9903.202 of Chapter 99 Of Title 48 CFR (48 CFR 9903.202).
- 2. Part I of the Statement provides general information concerning each reporting unit (e.g., segment, Corporate or other intermediate level home office, or a business unit). Parts II through VII pertain to the types of costs generally incurred by the segment or business unit directly performing Federal contracts or similar cost objectives. Part VIII pertains to the types of costs that are generally incurred by a Home office and are allocated to one or more segments performing Federal contracts. For a definition of the term "home office", see 48 CFR 9904.403.
- 3. Each segment or business unit required to disclose its cost accounting practices should complete the Cover Sheet, the Certification, and Parts I through VII.
- 4. Each home office required to disclose its cost accounting practices for measuring, assigning and allocating its costs to segments performing Federal contracts or similar cost objectives shall complete the Cover Sheet, the Certification, Part I and Part VIII of the Disclosure Statement. Where a home office either establishes practices or procedures for the types of costs covered by Parts V, VI and VII, or incurs and then allocates these types of cost to its segments, the home office may complete Parts V, VI and VII to be included in the Disclosure Statement submitted by its segments. While a home office may have more than one segment submitting Disclosure Statements, only one Statement needs to be submitted to cover the home office operations.
 - 5. The Statement must be signed by an authorized signatory of the reporting unit.
- 6. The Disclosure Statement should be answered by marking the appropriate line or inserting the applicable letter code which describes the segment's (reporting unit's) cost accounting practices.
- 7. A number of questions in this Statement may need narrative answers requiring more space than is provided. In such instances, the reporting unit should use the attached continuation sheet provided. The continuation sheet may be reproduced locally as needed. The number of the question involved should be indicated and the same coding required to answer the questions in the Statement should be used in presenting the answer on the continuation sheet. Continuation sheets should be inserted at the end of the pertinent Part of the Statement. On each continuation sheet, the reporting unit should enter the next sequential page number for that Part and, on the last continuation sheet used, the words "End of Part" should be inserted after the last entry.
- 8. Where the cost accounting practice being disclosed is clearly set forth in the contractor's existing written accounting policies and procedures, such documents may be cited on a continuation sheet and incorporated by reference at the option of the contractor. In such cases, the contractor should provide the date of issuance and effective date for each accounting policy and/or procedures document cited. Alternatively, copies of the relevant parts of such documents may be attached as appendices to the pertinent Disclosure Statement Part. Such continuation sheets and appendices should be labeled and cross-referenced with the applicable Disclosure Statement number and follow the page number specified in paragraph 7. Any supplementary comments needed to adequately describe the cost accounting practice being disclosed should also be provided.
- 9. Disclosure Statements must be amended when cost accounting practices are changed to comply with a new CAS or when practices are changed with or without knowledge of the Government (Also see 48 CFR 9903.202-3).

GENERAL INSTRUCTIONS

- 10. Amendments shall be submitted to the same offices to which submission would have been made were an original Disclosure Statement filed.
- 11. Each amendment, or set of amendments should be accompanied by an amended cover sheet (indicating revision number and effective date of the change) and a signed certification. For all resubmissions, on each page, insert "Revision Number ____ " and "Effective Date ____ " in the Item Description block; and, insert a revision mark (e.g., "R") in the right hand margin of any line that is revised. Completely resubmitted Disclosure Statements must be accompanied by similar notations identifying the items which have been changed.
 - 12. Use of this Disclosure Statement, amended February 1996, shall be phased in as follows:
 - A. <u>New Contractors</u>. This form shall be used by new contractors when they are initially required to disclose their cost accounting practices pursuant to 9903.202-1.
 - B. Existing Contractors. If a contractor has disclosed its cost accounting practices on a prior edition of the Disclosure Statement (CASB DS-1), such disclosure shall remain in effect until the contractor amends or revises a significant portion of the Disclosure Statement in accordance with CAS 9903.202-3. Minor amendments to an existing DS-1 may continue to be made using the prior form. However, when a substantive change is made, a complete Disclosure Statement must be filed using this form. In any event, all contractors and subcontractors must submit a new Disclosure Statement (this version of the CASB DS-1) not later than the beginning of the contractor's next full fiscal year after December 31, 1998.

ATTACHMENT -

Blank Continuation Sheet

	COST ACCOUNTING STANDARDS BOARD	CONTINUATION SHEET		
	DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679	NAME OF REPORTING UNIT		
Item No.	Item descr	iption		
	-			
		-		
		- ·		
		-		
	-			
		-		

	ST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679	COVER SHEET AND CERTIFICATION
0.1	Company or Reporting Unit.	
	Name -	
	Street Address	
	City, State, & Zip Code	
	Division or Subsidiary of (if applicab	le)
0.2	Reporting Unit: (Mark one.)	
	B.1 into segments. Corporate Home Off 2 Intermediate Level H	
0.3	Official to Contact Concerning this Stateme	nt.
	Name and Title	
	Phone number (including area code	and extension)
0.4	Statement Type and Effective Date:	
	A. (Mark type of submission I (a) Original Statement (b) Revised Statement	
	B. Effective Date of this Staten	nent/Revision:
0.5	Statement Submitted To (Provide office nar extension):	ne, location and telephone number, include area code and
	(a) Cognizant Federal Agency:	
	(b) Cognizant Federal Auditor:_	
		CERTIFICATION
	revision, is the complete and accurate discl	and belief this Statement, as amended in the case of a osure as of the above date by the above-named as, as required by the Disclosure Regulation (48 CFR ds Board under P.L. 100-679.
		(Name)
	-	(Title)
	 THE PENALTY FOR MAKING A FALSE STATEMI	ENT IN THIS DISCLOSURE IS PRESCRIBED IN 18 U.S.C. § 1001

PART I - GENERAL INFORMATION

	REQUIRED BY PUBLIC LAW 100-679	NAME OF REPORTING UNIT				
Item No.	Item description					
	Part I	nstructions				
1.1.0	Sales data for this part should cover the unit. "Government CAS Covered Sales" subcontracts. "Annual CAS Covered Sales Type of Business Entity of Which the Reporting					
1.1.0	14be of business Enuty of which the Reporting	Unit is a Part. (Mark One.)				
	A. Corporation B. Partnership C. Proprietorship D. Not-for-profit organization E. Joint Venture F. Federally Funded Research Y. Other (Specify)	and Development Center (FFRDC)				
1.2.0	Predominant Type of Government Sales. (Mark	one.) <u>1</u> /				
	A Manufacturing B Research and Development C Construction D Services Y Other (Specify)	•				
1.3.0	Annual CAS Covered Government Sales as Perce (Mark one. An estimate is permitted for this sec	ntage of Total Sales (Government and Commercial). tion.) 1/				
	A Less than 10% B 10%-50% C 51%-80% D 81% - 95% E Over 95%					
1.4.0	Description of Your Cost Accounting System for appropriate line(s) and if more than one is marke	Government Contracts and Subcontracts. (Mark the d, explain on a continuation sheet.) 1/				
`	A. Standard costs - Job order B. Standard costs - Process C. Actual costs - Job order D. Actual costs - Process Y. Other(s) 2/					
	1/ Do not complete when Part I is filed in conjur 2/ Describe on a Continuation Sheet.	action with Part VIII.				

PART I - GENERAL INFORMATION

item No.	Item description				
1.5.0	Identification of Differences Between Contract Cost Accounting and Financial Accounting Records.				
	List on a continuation sheet, the types of costs charged to Federal contracts that are supported by memorandum records and identify the method used to reconcile with the entity's financial accounting records.				
1.6.0	conditions of Federal a	osts that are not reimbursable as allowable costs under the terms and wards are identified as follows: (Mark all that apply and if more than one is continuation sheet the major cost groupings, organizations, or other criteria for hnique.)			
1.6.1	incurred costs.				
	A	Specifically identified and recorded separately in the formal financial accounting records.			
	В	Identified in separately maintained accounting records or workpapers.			
	c	Identifiable through use of less formal accounting techniques that permit audit verification.			
	D	Determinable by other means. 1/			
1.6.2	Estimated costs.				
	A.	By designation and description (in backup data, workpapers, etc) which have specifically been identified and recognized in making estimates.			
	В	By description of any other estimating technique employed to provide appropriate recognition of any unallowable amounts pertinent to the estimates.			
	c	Other. <u>1</u> /			
1.7.0	Fiscal Year: reporting purposes, e.	(Specify twelve month period used for financial accounting and g., 1/1 to 12/31.)			
1.7.1	<u>Cost Accounting Period</u> :(Specify period. If the cost accounting period used for the accumulation and reporting of costs under Federal contracts is other than the fiscal year identified in Item 1.7.0, explain circumstances on a continuation sheet.)				
	1/ Describe on a Con	tinuation Sheet.			

PART II - DIRECT COSTS

	REQUIRED BY PUBLIC LAW 100-679	NAME OF REPORTING UNIT			
Item No.	Item description				
	Part II Instr	uctions			
	•				
	This part covers the three major categories of direct costs, i.e., Direct Material, Direct Labor, and Other Direct Costs.				
	It is not the intent here to spell out or define contractor should disclose practices based on its own charged directly to Federal contracts or similar cost of Other Direct Costs. For example, a contractor may consture as "Direct Material" for purposes of pricing profer cost reimbursement, etc.; some other contractor and still another as "Other Direct Costs." In these ci will disclose practices consistent with its own classif Other Direct Costs.	bjectives as Direct Material, Direct Labor, or harge or classify purchased labor of a direct oposals, requests for progress payments, claims may classify the same cost as "Direct Labor," rounstances, it is expected that each contractor			
2.1.0	Description of Direct Material. Direct material as use actually incorporated into the end product; they also costs when charged to Federal contracts or similar or continuation sheet the principal classes or types of material; group the material and service costs by those which are not.)	include material, consumable supplies, and other est objectives as Direct Material. (Describe on a naterial and services which are charged as direct			
2.2.0	Method of Charging Direct Material.				
2.2.1	Direct Charge Not Through an Inventory Account at: one is marked, explain on a continuation sheet.)	(Mark the appropriate line(s) and if more than			
	A. Standard costs (Describe the	type of standards used.) 1/			
	B. Actual Costs				
	Y Other(s) <u>1</u> /				
	Z Not applicable				
2.2.2	Charged Direct from a Contractor-owned Inventory Amore than one is marked, explain on a continuation s				
	A. Standard costs 1/				
	B. Average Costs 1/				
	C. First in, first out				
	D. Last in, first out				
	Y. Other(s) 1/				
	Z. Not applicable				
	1/ Describe on a Continuation Sheet.				

	COST ACCOUNTING STANDARDS BOARD	PART II - DIRECT COSTS				
	DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679	NAME OF REPORTING UNIT				
item No.	Item description					
2.3.0	<u>Timing of Charging Direct Material.</u> (Mark the approp direct material are charged to Federal contracts or sir marked, explain on a continuation sheet.)	riste line(s) to indicate the point in time at which nilar cost objectives, and if more than one line is				
	A. When orders are placed B. When both the material and inv C. When material is issued or rele cost objective D. When material is issued or rele E. When invoices are paid Y. Other(s) 1/ Z. Not applicable	ased to a process, batch, or similar intermediate				
2.4.0	Variances from Standard Costs for Direct Material. (I standard cost method, i.e., you have marked Line A line(s) in Items 2.4.1, 2.4.2, and 2.4.4, and if more ti sheet.)	of Item 2.2.1, or 2.2.2. Mark the appropriate				
2.4.1	Type of Variance.					
	A Price B Usage C Combined (A and B) Y Other(s) 1/					
2.4.2	Level of Production Unit used to Accumulate Variance as a basis for accumulating material variances.	. Indicate which level of production unit is used				
	A Plant-wide Basis B By Department C By Product or Product Line Y Other(s) 1/					
2.4.3	Method of Disposing of Variance. Describe on a control, the disposition of the variance.	inuation sheet the basis for, and the frequency				
2.4.4	Revisions. Standard costs for direct materials are revi	ised:				
	A Semiannually B Annually C Revised as needed, but at least Y Other(s) 1/	t once annually				
	1/ Describe on a Continuation Sheet.					

COST ACCOUNTING STANDARDS BOARD PART II - DIRECT COSTS DISCLOSURE STATEMENT NAME OF REPORTING UNIT **REQUIRED BY PUBLIC LAW 100-679** Item No. Item description 2.5.0 Method of Charging Direct Labor: (Mark the appropriate line(s) for each Direct Labor Category to show how such labor is charged to Federal contracts or similar cost objectives, and if more than one line is marked, explain on a continuation sheet. Also describe on a continuation sheet the principal classes of labor rates that are, or will be applied to Manufacturing Labor, Engineering Labor, and Other Direct Labor, in order to develop direct labor costs. Direct Labor Category Manufacturing <u>Engineering</u> Other Direct A. Individual/actual rates B. Average rates - uncompensated overtime hours included in computation 1/ C. Average rates - uncompensated overtime hours excluded from computation D. Standard costs/rates 1/ Y. Other(s) 1/ Z. Labor category is not applicable 2.6.0 Variances from Standard Costs for Direct Labor. (Do not complete this item unless you use a standard costs/rate method, i.e., you have marked Line D of Item 2.5.0 for any direct labor category. Mark the appropriate line(s) in each column of Items 2.6.1, 2.6.2, and 2.6.4. If more than one is marked, explain on a continuation sheet.) 2.6.1 Type of Variance. **Direct Labor Category** Manufacturing Engineering Other Direct A. Rate **B.** Efficiency C. Combined (A and B) Y. Other(s) 1/ Z. Labor category is not applicable 1/ Describe on a Continuation Sheet.

	COST ACCOUNTING STANDARDS BOARD	PART II - D	IRECT COSTS					
	DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679	NAME OF	REPORTING UNIT					
item No.	Item description							
2.6.2	Level of Production Unit used to Accumulate Varia as a basis for accumulating the labor variances.	nce. Indicate v	which level of prod	luction unit is used				
	-	_	Name I also October					
		Manufacturing L	Firect Labor Category Engineering	Other Direct				
	A. Plant-wide basis							
	B. By department							
	C. By product or product line Y. Other(s) 1/							
	Z. Labor category is not applicable	•		-				
	L. Later category is not approach	i						
2.6.3	Method of Disposing of Variance. Describe on a conf, the disposition of the variance.	ontinuation she	et the basis for, a	nd the frequency				
2.6.4	Revisions. Standard costs for direct labor are revi	sed:						
	A. Semiannually							
	B. Annually							
	C. Revised as needed, but at I	east once annua	ally					
	Y Other(s) 1/							
2.7.0	Description of Other Direct Costs. Other significal contracts or other final cost objectives. Describe other costs that are always charged directly, that e.g., fringe benefits, travel costs, services, subcor	on a continuation is, identified spe	n sheet the princi	pal classes of				
2.7.1	When Employee Travel Expenses for lodging and a or similar cost objectives the charge is based on:	subsistence are	charged direct to	Federal contracts				
	A Actual Costs							
	B. Per Diem Rates							
	C. Lodging at actual costs and	i subsistence at	per diem					
	Y. Other Method 1/ Z. Not Applicable							
	Z Rot Applicable							
2.8.0	Credits to Contract Costs. When Federal contract following circumstances, are the rates of direct lei applicable indirect costs always the same as those circumstance, and for each "No" answer, explain the original charge.)	bor, direct mate for the original	rials, other direct charges? (Mark o	costs and one line for each				
	Circumstance	<u>A. Yo</u>	B. No	Z. Not Applicable				
	(a) Transfers to other jobs/contracts							
	(b) Unused or excess materials remaining upon completion of contract							
	1/ Describe on a Continuation Sheet							

COST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT

PART III - DIRECT VS. INDIRECT COSTS

	REQUIRED	BY PUBLIC LAW 100-679	NAME OF REPORT	ING UNII			
item No.	Item description						
3.1.0	Criteria for Determining How Costs are Charged to Federal Contracts Or Similar Cost Objectives. Describe on a continuation sheet your criteria for determining when costs incurred for the same purpose, in like circumstances, are treated either as direct costs only or as indirect costs only with respect to final cost objectives.						
3.2.0	Treatment of Costs of Specified Functions, Elements of Cost, or Transactions. (For each of the functions, elements of cost or transactions listed in Items 3.2.1, 3.2.2, and 3.2.3, enter one of the Codes A through F, or Y, to indicate how the item is treated. Enter Code Z in those lines that are no applicable to you. Also, specify the name(s) of the indirect pool(s) (as listed in 4.1.0, 4.2.0 and 4.3.0) for each function, element of cost, or transaction coded E or F. If Code E, Sometimes direct/Sometimes indirect, is used, explain on a continuation sheet the circumstances under which both direct and indirect allocations are made.)						
		Treatment Code					
	B. Di C. D	irect material rect labor irect material and labor ther direct costs	E. Sometimes directF. Indirect onlyY. Other(s) 1/Z. Not applicable	//Sometimes indirect			
3.2.1		ements of Cost. ns Related to	TreatmentCode	Name of Pool(s)			
	(a)	Cash Discounts on Purchases		-			
	(b)	Freight in					
	(c)	Income from Sale of Scrap	·				
I	(d)	Income from Sale of Salvage					
	(e)	Incoming Material Inspection (receiving)					
:	(f)	Inventory adjustment					
	(g)	Purchasing		-			
	(h)	Trade Discounts, Refunds, Rebates, and Allowances on Purchases		·			
	1/ Describe	on a Continuation Sheet.					

COST ACCOUNTING STANDARDS BOARD PART III - DIRECT VS. INDIRECT COSTS DISCLOSURE STATEMENT NAME OF REPORTING UNIT **REQUIRED BY PUBLIC LAW 100-679** Item No. Item description 3.2.2 Functions, Elements of Cost. Treatment or Transactions Related to Code Name of Pool(s) **Direct Labor** Incentive Compensation (a) Holiday Differential (Priemium Pay) (b) **Vacation Pay** (c) **Overtime Premium Pay** (d) **Shift Premium Pay** (e) **Pension Costs** (f) (g) **Post Retirement Benefits Other** Than Pensions Health Insurance (h) Life Insurance (i) Other Deferred Compensation 1/ **(i)** (k) **Training (1)** Sick Leave

1/ Describe on a Continuation Sheet.

PART III - DIRECT VS. INDIRECT COSTS

0.	Item description					
3.2.3		ements of Cost. ns - Miscellaneous	TreatmentCode	Name of Pool(s		
	(a)	Design Engineering (in-house)				
	(b)	Drafting (in-house)				
	(c)	Computer Operations (in-house)	-			
	(d)	Contract Administration				
	(e)	Subcontract Administration Costs				
	(f)	Freight Out (finished product)				
	(g)	Line (or production) Inspection	<u> </u>			
	(h)	Packaging and Preservation				
	(i)	Preproduction Costs and Start-up Costs	 -			
	(i)	Departmental Supervision				
	(k)	Professional Services (consultant fees)				
	(I)	Purchased Labor of Direct Nature (on premises)				
	(m)	Purchased Labor of Direct Nature (off premises)				
	(n)	Rearrangement Costs				
	(o)	Rework Costs				
	(p)	Royalties				
	(p)	Scrap Work				
	(r)	Special Test Equipment				
	(s)	Special Tooling				
	(t)	Warranty Costs				
	(u)	Rental Costs				
	(v)	Travel and Subsistence				
	(w)	Employee Severance Pay				
	(x)	Security Guards				
		•				
				anno.		

	DISC	LOSURE	STANDARDS BOARD STATEMENT BLIC LAW 100-679		DIRECT COSTS PORTING UNIT
item No.	Item description				
			Part IV Instr	uctions	-
					these estandeds. M manufacturing
	engineering, a	nd compi costs	erable indirect costs, (II) general and s, as defined in Item 4.3.0. The tem	administrative	three categories: (i) manufacturing, (G&A) expenses, and (iii) service center as used in this part, refers only to the
	The f	ollowing .	Allocation Base Codes are provided	for use in conn	ection with Items 4.1.0, 4.2.0 and
	A .	Sales		н.	Direct labor dollars
	В.		of sales	I.	Direct labor hours
	C.		Cost input (direct material,	J.	Machine hours
		direct	labor, other direct costs	K.	Usage
		and a	pplicable overhead)	L.	Unit of production
	D.		added cost input (total cost	M.	Direct material cost
			less direct material and	N.	Total payroli dollars (direct
			ntract costs)	_	and indirect employees)
	E.		cost incurred (total cost	0.	Headcount or number of employees
	_		plus G&A expenses)	_	(direct and indirect employees)
	F.		cost (direct material, direct	P.	Square feet
			and other direct cost)	Y.	Other(s), or more than one basis
	G.		ssing or conversion cost t labor and applicable ead)	Z.	(Describe on a continuation sheet.) Pool not applicable
4.1.0	(G&A) expens business unit several pools pool listed ind objectives. A	may have such as a licate the liso, for a	are allocated to final cost objectives a only a single pool encompassing a manufacturing overhead, engineering been used for allocating such peel	without any in I of its overhead overhead, man ad expenses to jor functions, a	ctivities, and elements of cost included,
		(a)	Major functions, activities, and elements of cost included:		-
		(b)	Description/Make up of the allocation base:		
			-		

PART IV - INDIRECT COSTS COST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT NAME OF REPORTING UNIT **REQUIRED BY PUBLIC LAW 100-679 Item** Item description No. 4.1.0 Continued. **Allocation Base Code** 2. Major functions, activities, and (a) elements of cost included: (b) Description/Make up of the allocation base: General and Administrative (G&A) Expense Pool(s). Select among the three categories of pools below 4.2.0 that describe(s) the manner in which G&A expenses are allocated. For each category of pool(s) selected indicate the base(s) used for allocating such pooled expenses to Federal contracts or similar cost objectives. Also, for each category of pool(s) selected, indicate (a) the major functions, . activities, and elements of cost included, and (b) the make up of the allocation base(s). For example, if direct labor dollars are used, are fringe benefits included? If a total cost input base is used, is the imputed cost of capital included? Use a continuation sheet if additional space is required. Allocation **Base Code** Single Pool Containing G&A Expenses Only (a) Major functions, activities, and elements of cost included:

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(b)

Description/Make up of the allocation base:

PART IV -	INDIRECT COSTS
NAME OF	REPORTING UNIT

	REQUIR	ED BY PU	BLIC LAW 100-679	NAME OF REPORTIN	IG UNIT
Item No.			Item	description	
4.2.0	Continued.		Containing Both G&A and No	on-G&A Expenses	Allocation Base Code
	—— (a)	Majo	r functions, activities, and ents of cost included:	-	
	(b)	Desc	ription/Make up of the alloca	ation base:	
	<u>Spa</u> 1.	ecial Alloc	ations		Allocation Base Code
		(a)	Major functions, activities elements of cost included		
		(b)	Description/Make up of t	he allocation base:	
	2.	(a)	Major functions, activities elements of cost includes		
		(b)	Description/Make up of t	the allocation base:	- -

PART IV - INDIRECT COSTS

NAME OF REPORTING UNIT

Alloca-

item No.

Item description

4.3.0 Service Center and Expense Pool Allocation Bases.

Service centers are departments or other functional units which perform specific technical and/or administrative services primarily for the benefit of other units within a reporting unit. Expense pools are pools of indirect costs that are allocated primarily to other units within a reporting unit. Examples of service centers are data processing centers, reproduction services and communications services. Examples of expense pools are use and occupancy pools and fringe benefit pools.

Category Code

Generally, costs incurred by such centers or pools are, or can be, charged or allocated (i) partially to specific final cost objectives as direct costs and partially to other indirect cost pools (such as a manufacturing overhead pool) for subsequent reallocation to several final cost objectives, referred to herein as Category "A", and (ii) only to several other indirect cost pools (such as a manufacturing overhead pool, engineering overhead pool and G&A expense pool) for subsequent reallocation to several final cost objectives, referred to herein as Category "B".

Rate Code

Some service centers or expense pools may use predetermined billing or costing rates to charge or allocate the costs (Rate Code A) while others may charge or allocate on an actual basis (Rate Code B).

List all the service centers and expense pools and enter in column (1) Code A or B to indicate the category of pool. Enter in Column (2) one of the Allocation Base Codes A through P, or Y, listed on Page ____, to indicate the base used for charging or allocating service center or expense pool costs. Enter in Column (3) Rate Code A or B to describe the costing method used. Also, for each of the centers and pools indicate (a) the major functions, activities, and elements of cost included, and (b) the make up of the allocation base. Use a continuation sheet if additional space is required.

	ice Center or ense Pool	Category Code (1)_	Code	Cod
(a)	Major functions, activities, and elements of cost included:	_		
(b)	Description/Make up of the allocation base:			
(a)	Major functions, activities, and elements of cost included:	_	-	
(b)	Description/Make up of the allocation base:			

	COST ACCOUNTING STANDARDS BOARD	PART IV - INDIRECT COSTS			
	DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679	NAME OF REPORTING UNIT			
item No.	Item description				
4.4.0			:		
		s of charges made, at least once annually irect cost pool(s) at least once annually le to reporting unit			
4.5.0	other then the normal full rate for that pool. In the cas- rate" or "more than full rate" should be used to describ	tice in special situations where, in lieu of made from an established overhead or G&A pool at a rate of such a special allocation, the terms "less than full			
	For each of the transactions or costs listed belindicate your indirect cost allocation practice with respentered, identify on a continuation sheet the pool(s) repapilicable. If Codes B or C, less than or more than the major types of expenses that are covered by such a ret	ect to that transaction or cost. If Code A, full rate, is ported under items 4.1.0, 4.2.0, and 4.3.0, which are a full rate, is entered, describe on a continuation sheet the			
	Ret	te Code			
	A. Full rate B. Special allocation at less than full rate Z. Transaction or cost is r	C. Special allocation at more than full rate D. No overhead or G&A is applied not applicable to reporting unit			
	Transaction or Cost to Which indirect Costs May be Allocated	Rate <u>Code</u>			
	(b) Purchased Labor (c) Government-furnished materials (d) Self-constructed depreciable assets (e) Labor on installation of assets (f) Off-site work (g) Interorganizational transfers out interorganizational transfers out interorganizational transfers in (Also in continuation sheet the basis used by y to charge the cost or price of interogra transfers to Federal contracts or simila objectives. If the charge is based on of whether the transferor's G&A expense (i) Other transactions or costs (Enter Cod line if there are other transactions or cost applied. List such transactions or cost types of expenses covered by such a are no other such transactions or cost	you as transferee ranizational ar cost cost, indicate es are included.) de B or C on this costs to which full rate is sits on a rate. If there			
	1/ Describe on a Continuation Sheet.				

PART IV - INDIRECT COSTS

REQUIRED BY PUBLIC LAW 100-679 NAME OF REPORTING UNIT						
item No.	Item description					
4.6.0	requirements for the a	illocation of IR&D and B&P costs anufacturing, engineering, and/o B&P projects were under contrac	id and Proposal (B&P) Costs. Definitions of and are contained in 48 CFR 9904.420. The full rother overhead is applied to IR&D and B&P costs are:			
	A.	Allocated to Federal contracts composite pool with G&A expe	or similar cost objectives by means of a enses.			
	В	Allocated to Federal contracts separate pool.	or similar cost objectives by means of a			
·	c	Transferred to the corporate or benefiting segments.	r home office level for reallocation to the			
	Y	Other <u>1</u> /				
	z	Not applicable				
4.7.0	Cost of Capital Communication	nitted to Facilities. In accordance capital items are allocated to o	e with instructions for Form CASB-CMF, verhead and G&A expense pools: (Mark one.)			
	A		ed to absorb the actual depreciation or es; land is assigned in the same manner as the			
	В		t used to absorb the actual depreciation or les. (Describe on a continuation sheet the allocation process.)			
	c	By the "alternative allocation g CASB-CMF.	process" described in instructions for Form			
	z.	Not applicable.				
		-				
	1/ Describe on a Cor	ntinuation Sheet.				

PART V - DEPRECIATION AND CAPITALIZATION PRACTICES

DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679 NAME OF REPORTING UNIT						
	RECOURSED BY PUBLIC DAW 100-079					
Item No.	Item description					
	Part V Instr	uctions				
	Where a home office either establishes practic covered in this Part or incurs and then allocates these complete this Part to be included in the submission by General Instructions.	costs to its segments, the home office may				
5.1.0	Depreciating Tangible Assets for Government Contract listed on Page, enter a code from A through H in depreciation (Code F for assets that are expensed); a the basis for determining useful life; a code from A th depreciation methods or use charges are applied to provide the provided to the code of the	Column (1) describing the method of code from A through C in Column (2) describing brough C in Column (3) describing how roperty units; and a Code A, B or C in Column and from the total cost of depreciable assets. Here another or more than one method applies.				
	Column (1)-Depreciation Method Code	Column (2)—Useful Life Code				
	A. Straight Line B. Declining balance C. Sum-of-the years digits D. Machine hours E. Unit of production F. Expensed at acquisition G. Use charge H. Method of depreciation used under the applicable internal Revenue Procedures Y. Other or more than one method 1/ Z. Asset category is not applicable	A. Replacement experience adjusted by expected changes in periods of usefulness B. Term of Leese C. Estimated on the basis of Asset Guidelines under Internal Revenue Procedures Y. Other, or more than one method 1/				
	Column (3)—Property Units Code A. Individual units are accounted for separately B. Applied to groups of assets with similar service lives C. Applied to groups of assets with varying service lives Y. Other or more than one method 1/	Column (4)—Residual Value Code A. Residual value is estimated and deducted B. Residual value is covered by the depreciation method (e.g., declining balance) C. Residual value is estimated but not deducted in accordance with the provisions of 48 CFR 9904.409 1/ Y. Other or more than one method 1/				
	separately B. Applied to groups of assets with similar service lives C. Applied to groups of assets with varying service lives	deducted B. Residual value is covered by the depreciation method (e.g., declining balance) C. Residual value is estimated but not deducted in accordance with the provisions of 48 CFR 9904.409 1/				

1/ Describe on a Continuation Sheet.

COST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT

PART V	- DEPRECIATION AND	
	CAPITALIZATION PRACTICES	ŝ

REQUIRE	D BY PUBLIC LAW 100-679	NAME OF REPORTING UNIT			
	item d	escription			
Continued.		Depreciation	[]gefisl	Property	Residual
		Method	Life	Units	Value
Ass	et Category	Code	Code	Code	Code
		<u>(1)</u>	<u>(2)</u>	<u>(3)</u>	<u>(4)</u>
(a)	Land improvements				
	- -	·			
					
			•		
		-			
(i)	Programming/reprogramming costs	_			
Ø	Patterns and dies				
(1)					
	,				
				-	
	Code Z.)				
the same for or (B) on ea	or costing Federal contracts as for fina sch line under Financial Accounting an	ncial accounting	and inco	ome tax? (Mark either (A)
Fina	ancial Accounting	A. Yes		B. <u>No</u>	
(a)	Methods				
(b)	Useful lives				
(c)	Property units			-	
(d)	Residual values				
ince	ome Tax	A. <u>Yes</u>		B. <u>No</u>	
(e)	Methods				
(f)	Useful lives				
(g)	Property units				
(h)	Residual values				
		·		-	
	Continued. Ass (a) (b) (c) (d) (e) (f) (g) (h) (i) (i) (i) (i) (i) (i) (i) (i) (i) (i	Continued. Asset Category (a) Land improvements (b) Building (c) Building improvements (d) Lessehold improvements (e) Machinery and equipment (f) Furniture and fixtures (g) Automobiles and trucks (h) Data processing equipment (i) Programming/reprogramming costs (j) Patterns and dies (k) Tools (l) Other depreciable asset categories (Enter Code Y on this line if other asset categories are used and enumerate on a continuation sheet each such asset category and the applicable codes. Otherwise enter Code Z.) Depreciation Practices for Costing, Financial Accrete same for costing Federal contracts as for fina or (B) on each line under Financial Accounting an complete this item.) Financial Accounting (a) Methods (b) Useful lives (c) Property units (d) Residual values Income Tax (e) Methods (f) Useful lives (g) Property units	Continued. Depreciation Method Code	Continued. Depreciation Method Life	Continued. Depreciation Useful Property Method Life Units Code Code Code (1) (2) (3)

PART V - DEPRECIATION AND CAPITALIZATION PRACTICES

	RECUIRED	BY PUBLIC LAW 100-679			
ltem No.			Item description	·	
5.3.0	Fully Deprecia (Mark one.)	eted Assets. Is a usage char	ge for fully deprecia	ted assets charged to Federa	i contracts?
	Α.	Yes <u>1</u> /			
	В.	No			
	Z.	Not applicable			
5.4.0		Gains and Losses on Disposite line(s) and if more than on		Property. Gains and losses a on a continuation sheet.)	re: (Mark
	Α.		currently to the sa assets was charged	rme overhead or G&A pools t i	o which the
	В.	Taken into conside where trade-in is in		ation cost basis of the new i	tems,
	C.	Not accounted for	separately, but refle	ected in the depreciation rese	rve account
	Y.	Other(s) <u>1</u> /			
	Z.	Not applicable		-	
5.5.0	regarding cap the same spe	italization or expensing of sp	ecified costs incurrenced and sometime	e on each item to indicate you ad in connection with capital as capitalized, mark both line th method is used.)	assets. If
	Cos	st.	A. Expensed	B. <u>Capitalized</u>	
	(a)	Freight-in			
	(b)	Sales taxes	-	· · · · · · · · · · · · · · · · · · ·	
	(c)	Excise taxes	***********		
	(d)	Architect-engineer fees			
	(e)	Overhauls (extraordinary re	epairs)		
	1/ Describe	on a Continuation Sheet.		-	

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COST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679

PART V - DEPRECIATION AND CAPITALIZATION PRACTICES

	REQUIRED BY PUBLIC DAW 100-079
item No.	Item description
5.6.0	<u>Criteria for Capitalization.</u> Enter (a) the minimum dollar amount of acquisition cost or expenditures for addition, alteration and improvement of depreciable assets capitalized, and (b) the minimum number of expected life years of capitalized assets.
	If more than one dollar amount or number applies, show the information for the majority of your depreciable assets, and enumerate on a continuation sheet the dollar amounts and/or number of years for each category or subcategory of assets involved which differ from those for the majority of assets.
	(a) Minimum dollar amount capitalized
	(b) Minimum service life years
5.7.0	Group or Mass Purchase. Are group or mass purchases (original complement) of low cost equipment, which individually are less than the capitalization amount indicated above, capitalized? (Mark one. If Yes is marked, provide the minimum aggregate dollar amount capitalized.)
	A Yes
	Minimum aggregate dollar amount capitalized
	B No

PART VI - OTHER COSTS AND CREDITS

	REQUIRE	ED BY PUBLIC LAW 100-679	NAME OF REPORT	NG UNIT		
item No.	Item description					
	-	Part VI	Instructions			
					_	
	in this Part	ere a home office either establishes p or incurs and then allocates these co be included in the submission by the E-	sts to its segments, the he	ome office may	complete	
6.1.0	each colum	Charging and Crediting Vacation, Holin of Items 6.1.1, 6.1.2, 6.1.3 and 6.1 or unpaid vacation, holiday, or sick particular.	1.4 to indicate the method	d used to charg	e, or credit	
	continuatio	n snoat.)		Sala:	ried	
6.1.1	Charges fo	r Vacation Pay	Houri (1)		Exempt <u>1</u> / (3)	
	A.	When Accrued (earned)				
	В.	When Taken				
	Y.	Other(s) <u>2</u> /			<u> </u>	
6.1.2	Charges fo	r Holiday Pay				
	A .	When Accrued (earned)				
	B.	When Taken	<u> </u>			
	Y.	Other(s) 2/				
6.1.3	Charges fo	r Sick Pay				
	A.	When Accrued (earned)				
	B.	When Taken				
	Y.	Other(s) 2/	_			
6.1.4	Credits for	Unused or Unpaid				
		Holiday, or Sick Pay				
	A.	Credited to Accounts Originally				
		charged at Least Once Annually		-		
	B .	Credited to Indirect Cost Pools at Least Once Annually				
	c.	Carried Over to Future Cost				
İ	1-	Accounting Periods 2/				
	Y.	Other(s) 2/			<u>-</u>	
	Z.	Not Applicable		.		
		the definition of Non-exempt and Exe S.C. 206.	empt salaries, see the Fair	Labor Standard	ds Act, 29	
]		scribe on a Continuation Sheet.				

PART VI - OTHER COSTS AND CREDITS

	· ·	
Item No.		Item description
6.2.0		ployment (Extended Layoff) Benefit Plans. Costs of such plans are charged to (Mark the appropriate line(s) and if more than one is marked, explain on a
	A	When actual payments are made directly to employees
	В	When accrued (book accrual or funds set aside but no trust fund involved)
	с	When contributions are made to a nonforfeitable trust fund
	D	Not charged
	Y	Other(s) <u>1</u> /
	z	Not applicable
6.3.0	incentive plans, as o directly or indirectly	Early Retirement. Costs of normal turnover severance pay and early retirement defined in FAR 31.2 or other pertinent procurement regulations, which are charged to Federal contracts, are based on: (Mark the appropriate line(s) and if more than ain on a continuation sheet.)
	A	Actual payments made
	В	Accrued amounts on the basis of past experience
1	С	Not charged
1	Y	Other(s) <u>1</u> /
	z	Not applicable
6.4.0	incidental or miscell selling services, who	(Mark the appropriate line(s) to indicate the method used to account for aneous receipts, such as revenues from renting real and personal property or en related costs have been allocated to Federal contracts. If more than one is a continuation sheet.)
	A	The entire amount of the receipt is credited to the same indirect cost pools to which related costs have been charged
	В	Where the amount of the receipt includes an allowance for profit, the cost- related part of the receipt is credited to the same indirect cost pools to which related costs have been charged; the profits are credited to Other (Miscellaneous) Income
	. c	The entire amount of the receipt is credited directly to Other (Miscellaneous) income
	Y	Other(s) <u>1</u> /
	z	Not applicable
	1/ Describe on a C	ontinuation Sheet.

PART VI - OTHER COSTS AND CREDITS

<u> </u>						
item No.		Item descr	iption			
6.5.0	<u>Proceeds from Employee Welfare Activities.</u> Employee welfare activities include all of those activities set forth in FAR 31.2. (Mark the appropriate line(s) to indicate the practice followed in accounting for the proceeds from such activities. If more than one is marked, explain on a continuation sheet.)					
	A		n employee-welfare organization or fund; such plicable costs such as depreciation, heat, light			
	В	Same as above, except the pro	oceeds are not reduced by all applicable costs			
	с	Proceeds are credited at least which costs have been charge	once annually to the appropriate cost pools to			
	D	Proceeds are credited to Other	(Miscellaneous) Income			
	Y	Other(s) <u>1</u> /				
	z.	Not applicable				
			-			
			-			
	1/ Describe on a Cor	ntinuation Sheet.	·			

PART VII - DEFERRED COMPENSATION AND INSURANCE COST

	REQUIRED	BY PUBLIC LAW 100-679	NAME OF REPORTING UNIT		
Item No.			Item description		
	retirement ber of deferred co corporate or h	part covers the measurement a nefits other than pensions (in ompensation, and insurance. home office level, while other	Part VII Instructions and assignment of costs for employee pension cluding post retirement health benefits), certain Some organizations may incur all of these costs may incur them at subordinate organization at the corporate level and the balance at subordinate.	ein other types osts at the nal levels. Still	
	organizational levels. Where the segment (reporting unit) does not directly incur such costs, the segment should, of a continuation sheet, identify the organizational entity that incurs and records such costs, and should require that entity to complete the applicable portions of this Part VII. Each such entity is to fully disclose the methods and techniques used to measure, assign, and allocate such costs to the segment(s) performing Federal contracts or similar cost objectives. Necessary explanations required to achieve that objective should be provided by the entity on a continuation sheet.				
	covered in thi	is Part VII or incurs and then Part to be included in the su	shes practices or procedures for the types of allocates those costs to its segments, the ho obmission by the segment as indicated on pag	me office may	
7.1.0	plans whose	with Costs Charged to Fede costs are charged to Federal mber of plans.)	eral Contracts. Identify the types and number contracts or similar cost objectives: (Mark a	pplicable line(s)	
		Type of Pension Pla	<u>an</u>	Number of Plans	
	A.	Other than ESOPs (see 7.5.0))			
		 Non-Qualified Qualified 			
	B. Defined-Benefit Plan				
		1. Non-Qualified			
		b. Costs are measu	ured and assigned on accrual basis ured and assigned on cash		
		(pay-as-you-go) 2. Qualified	basis		
		a. Trusteed (Subje	ct to ERISA's minimum funding requirements an (Exempt from ERISA's minimum funding	-	
		requirements) tr	rested as a defined-contribution plan gained plan treated as a defined-		
	Y.	Other <u>1</u> /			
	Z.	Not Applicable (Proce	eed to Item 7.2.0)		
	1/ Describe	on a Continuation Sheet.			

PART VII - DEFERRED COMPENSATION AND INSURANCE COST

item No.	Item description						
7.1.1	General Plan Information. On a continuation sheet for each plan identified in Item 7.1.0, provide the following information:						
	A. The plan name						
	B. The Employer Identification Number (EIN) of the plan sponsor as reported on IRS Form 5500, if any						
	C. The plan number as reported on IRS Form 5500, if any						
	D. Is there a funding agency established for the plan?						
	E. Indicate where costs are accumulated: (1) Home Office (2) Segment						
	F. If the plan provides supplemental benefits to any other plan, identify the other plan(s).						
7.1.2	Defined-Contribution Plan(s) and Certain Defined-Benefit Plans treated as Defined-Contribution Plans. Where numerous plans are listed under 7.1.0.A., 7.1.0.B.2.b., or 7.1.0.B.2.c., for those plans which represent the largest dollar amounts of costs charged to Federal contracts, or similar cost objectives, describe on a continuation sheet the basis for the contribution (including treatment of dividends, credits, and forfeitures) required for each fiscal year. (If there are not more than three plans, provide information for all the plans. If there are more than three plans, information should be provided for those plans that in the aggregate account for at least 80 percent of those defined-contribution plan costs allocable to this segment or business unit.)						
	Z Not applicable. (Proceed to Item 7.1.3)						
7.1.3	Defined-Benefit Plan(s). Where numerous plans are listed under 7.1.0.B. (excluding certain defined-benefit plans treated as defined-contribution plans reported under 7.1.0.B.2.b. and 7.1.0.B.2.c.), for those plans which represent the largest dollar amounts of costs charged to Federal contracts, provide the information requested below on a continuation sheet. (If there are not more than three plans, provide information for all the plans. If there are more than three plans, information should be provided for those plans that in the aggregate account for at least 80 percent of those defined-benefit plan costs allocable to this segment or business unit.):						
	A. Actuarial Cost Method. Identify the actuarial cost method used, including the cost method(s) used to value anciliary benefits, for each plan. Include the method used to determine the actuarial value of assets. Also, if applicable, include whether normal cost is developed as a level dollar amount or as a level percent of salary. For plans listed under 7.1.0.B.1.b., enter "pay-as-you-go".						
	B. Actuarial Assumptions. Describe the events or conditions for which significant actuarial assumptions are made for each plan. Do not include the current numeric values of the assumptions, but provide a description of the basis used for determining these numeric values. Also, describe the criteria used to evaluate the validity of an actuarial assumption. For plans listed under 7.1.0.B.1.b., enter "not applicable".						
	C. Market Value of Funding Agency Assets. Indicate if all assets of the funding agency are valued on the basis of a readily determinable market price. If yes, indicate the basis for the market value. If no, describe how the market values are determined for those assets that do not have a readily determinable market price. For plans listed under 7.1.0.8.1.b., enter "not applicable".						
	D. <u>Basis for Cost Computation.</u> Indicate whether the cost for the segment is determined as:						
	 An allocated portion of the total pension plan cost. A separately computed pension cost for one or more segments. If so, identify tiess segments. 						
	Z. Not applicable, proceed to Item 7.2.0.						

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COST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679

PART VII - DEFERRED COMPENSATION AND INSURANCE COST

item No.		Item description	
7.2.0	Charged to F number of Pf retires benefit	ant Benefits (PRBs) Other than Pensions (including post-retirement federal Contracts. Identify the accounting method used to determ RB plans whose costs are charged to Federal contracts or similar its are provided as an integral part of an employee group insurance yees, report that plan under 7.3.0. (Mark applicable line(s) and e	nine the costs and the cost objectives. Where ce plan that covers
		Method Used to Determine Costs	Number of Plans
-	A.	Accruai Accounting	
	В.	Cash (pay-as-you-go) Accounting	
	C.	Purchased Insurance from unrelated Insurer	
	D.	Purchased Insurance from Captive Insurer	
	E.	Self-insurance (including insurance	
		obtained through Captive Insurer)	
	F.	Terminal Funding	
	Ÿ.	Other 1/	
	Z.	Not Applicable (Proceed to Item 7.3.0)	
7.2.1		Plan Information. On a continuation sheet for each plan identifie information grouped by method used to determine costs: The plan name	d in item 7.2.0, provide
	В.	The Employer Identification Number (EIN) of the plan sponsor a 5500, if any	as reported on IRS Form
	C.	The plan number as reported on IRS Form 5500, if any	
	D.	Is there a funding agency or funded reserve established for the	s plan?
	E.	Indicate where costs are accumulated: (1) Home Office (2) Segment	
	F.	Are benefits provided pursuant to a written plan or an established practice, briefly describe.	hed practice? If
i,	G.	If this PRB plan is listed under 7.2.0.C., 7.2.0.D., or 7.2.0.E., plan is operated as an employee group insurance program. If under 7.2.0.Y., indicate whether the plan is operated as a gro if the plan is operated as an employee group insurance program 7.3.0. and 7.3.1., as appropriate. If no, report the plan under	this PRB plan is listed up insurance program. m, report this plan under
	1/ Describe	on a Continuation Sheet.	

PART VII - DEFERRED COMPENSATION AND INSURANCE COST

	REQUIRED	BY PUBLIC LAW 100-679	NAME OF REPORTING UNIT		
item No.	Item description				
7.2.2					
	A .	benefit, as appropriate. Include the assets. Identify the amortization munder 7.2.0.B., enter "cash account."	e actuarial cost method used for each plan or each e method used to determine the actuarial value of methods and periods used, if any. For plans listed under 7.2.0.F., enter amortization methods and periods used, if any.		
	В.	actuarial assumptions are made for values of the assumptions, but pro these numeric values. Also, descr	the events or conditions for which significant reach plan. Do not include the current numeric wide a description of the basis used for determining the the criteria used to evaluate the validity of an older 7.2.0.B. or 7.2.0.F., enter "not applicable".		
	C.	<u>Funding.</u> Provide the following inf plan: (For plans under 7.2.0.B. or	ormation on the funding practice for the costs of the 7.2.0.F., enter "not applicable".)		
		e.g., full funding of the acc rules. 2. Briefly describe the funding 3. Are all assets valued on th yes, indicate the basis use	e basis of a readily determinable market price? If d for the market value. If no, describe how the for those assets that are not valued on the basis of		
	D.	Basis for Cost Computation. Indicas:	ate whether the cost for the segment is determined		
		An allocated portion of the A separately computed PR those segments.	total PRB plan cost B cost for one or more segments. If so, identify		
	E.	Forfeitability. Does each participal benefit or account balance? If no,	nt have a non-forfeitable contractual right to their explain.		
	Z.	Not applicable, proceed to	item 7.3.0.		

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COST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT RECHRED BY PUBLIC LAW 100-679

PART VII - DEFERRED COMPENSATION AND INSURANCE COST

	RECOINED BY PUBLIC DAW 100-079					
item No.	Item descri	ption				
7.3.0	Employee Group Insurance Charged to Federal Contracts or Similar Cost Objectives. Does your organization provide group insurance coverage to its employees? (Includes coverage for life, hospital, surgical, medical, disability, accident, and similar plans for both active and retired employees, even if the coverage was previously described in 7.2.0.)					
	A. Yes (Complete Item 7.3.1)					
	B No (Proceed to Item 7.4.0)	-				
7.3.1	Employee Group Insurance Programs. For each program that covers a category of insured risk (e.g., life, hospital, surgical, medical, disability, accident, and similar programs for both active and retired employees), provide the information below on a continuation sheet, using the codes described below: (If there are not more than three policies or self-insurance plans that comprise the program, provide information for all the policies and self-insurance plans. If there are more that three policies or self-insurance plans, information should be provided for those policies and self-insurance plans that in the aggregate account for at least 80 percent of the costs allocable to this segment or business unit for the program that covers each category of insured risk identified.)					
:	Description of Employee Group Insurance Prog	eram:				
	Policy or Self- Cost Cost Including Insurance Plan Accumulation Basis Retire (1) (2) (3)	es Basis Loss Expenses				
	Column (1) — <u>Cost</u>	<u>Accumulation</u>				
	Enter Code A, B, or Y, as appropriate.					
	A. Costs are accumulated at the Home O B. Costs are accumulated at Segment Y. Other 1/	ffice.				
	Column (2) — <u>Cost Basis</u>					
	Enter code A, B, C, or Y, as appropriate.					
	A. Purchased insurance from unrelated the B. Self-insurance C. Purchased insurance from a captive in Y. Other 1/	• •				
	1/ Describe on a Continuation Sheet.					

COST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679 PART VII - DEFERRED COMPENSATI AND INSURANCE COST NAME OF REPORTING UNIT						
Item						
No.	<u> </u>	item d	lescription			
7.3.1	Continued.		-			
		Column (3) —	Includes Retirees			
	Enter	code A, B, C, or Y, as appropriate.				
	A.	No, does not include benefits for retin	oùs.			
	B.		a part of a policy or coverage for both active employees			
	ļ	and retirees are reported here instead	of 7.2.0.			
	C.	Yes, PRB benefits for retirees are a pr	ert of a PRB plan previously reported under 7.2.0.			
	Υ.	Other <u>1</u> /				
		Column (4) - <u>Purchas</u>	ed Insurance Rating Basis			
	For ea	nch plan listed enter code A, B, C, Y, or	Z, as appropriate.			
	A. Retrospective Rating (also called experience rating plan or retention plan).					
	В.	Manually Rated				
	C.	Community Rated				
	Y.	Other, or more than one type 1/				
	2.	Not applicable				
	Column (5) — Projected Average Loss					
	For each self-insured group plan, or the self-insured portion of purchased insurance, enter code A, B, C, Y, or Z, as appropriate.					
	A. Self-insurance costs represent the projected average loss for the period estimated on the basis of the cost of comparable purchased insurance.					
	В.					
		anticipated conditions in accordance v				
	C.	Actual payments are considered to re	present the projected average loss for the period.			
	Y.	Other, or more than one method 1/				
	Z. Not applicable					
		Column (6) - Insuranc	a Administration Expenses			
	For as	ch self-insured group plan, or the self-in	sured portion of purchased insurance, enter code A, B, C,			
' !		or Z, as appropriate, to indicate how ad	•			
	A.	Separately identified and accumulated	in indirect cost pool(s).			
	В.		nd allocated to cost objectives either at the segment anti/or			
	home office level (Describe allocation method on a Continuation Sheet).					
	C.		in indirect cost pool(s). (Describe pool(s) on a			
		Continuation Sheet)				
	D.		rd party (Describe accumulation and allocation process on			
	Υ.	a Continuation Sheet). Other 1/				
	Z.	Not applicable				
1						
	1/ Descri	ibe on a Continuation Sheet.				
	1 Ti Design					

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COST ACCOUNTING STANDARDS BOARD DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679

PART VII - DEFERRED COMPENSATION AND INSURANCE COST

Item No.		Item description			
7.4.0	<u>Deferred Compensation, as defined in CAS 9904.415.</u> Does your organization award deferred compensation, other than ESOPs, which is charged to Federal contracts or similar cost objectives? (Mark one.)				
	A.	Yes (Complete Item 7.4.1.)			
	B.	No (Proceed to Item 7.5.0.)			
7.4.1		Information. On a continuation sheet for all deferred compensation plans, as defined by 15, provide the following information:			
·	A.	The plan name			
	. B.	The Employer Identification Number (EIN) of the plan sponsor as reported on IRS Form 5500, if any			
	C.	The plan number as reported on IRS Form 5500, if any			
	D.	Indicate where costs are accumulated:			
	· -	(1) Home office (2) Segment			
	E.	Are benefits provided pursuant to a written plan or an established practice? If established practice, briefly describe.			
7.4.2	represent the objectives, pro- plans, provide provided for t	pensation Plans. Where numerous plans are listed under 7.4.1, for those plans which largest dollar amounts of costs charged to Federal contracts, or other similar cost ovide the information below on a continuation sheet. (If there are not more than three information for all the plans. If there are more than three plans, information should be hose plans that in the aggregate account for at least 80% of these deferred costs allocable to this segment or business unit):			
	A.	Description of Plan.			
	-	 Stock Options Stock Appreciation Rights Cash Incentive Other (explain) 			
	В.	Method of Charging Costs to Federal Contracts or Similar Cost Objectives.			
		 Costs charged when accrued and the accrual is fully funded Costs charged when accrued and the accrual is partially funded or not funded Costs charged when paid to employee (pay-as-you-go) Other (explain) 			
	-				

PART VII - DEFERRED COMPENSATION AND INSURANCE COST

item No.	Item description						
7.5.0		ock Ownership Plans (ESOPs). Does your organization make contributions to fund ESOPs ged directly or indirectly to Federal contracts or similar cost objectives? (Mark one)					
	A.	Yes (Proceed to Item 7.5.1)					
	В.	No (Proceed to Item 7.6.0)					
7.5.1	General Plan	Information. On a continuation sheet, for all ESOPs provide the following information:					
	A.	The plan name					
	В.	The Employer Identification Number (EIN) of the plan sponsor as reported on IRS Form 5500, if any					
	C.	The plan number as reported on IRS Form 5500, if any					
	D.	Indicate where costs are accumulated: (1) Home office (2) Segment					
	E.	Are benefits provided pursuant to a written plan or an established practice? If established practice, briefly describe.					
	F.	Indicate whether the ESOP plan is a defined-contribution plan subject to CAS 9904.412. (Answer Yes or No).					
	G.	Indicate whether the ESOP is leveraged or nonleveraged.					
	н.	<u>Valuation of Stock or Non-Cash Assets.</u> Are the plan assets valued on the basis of a readily determinable market price? If yes, indicate the basis for the market value. If no, indicate how the market value is determined for those assets that do not have a readily determinable market price.					
	l.	<u>Forfeitures and Dividends.</u> Describe the accounting treatment for forfeitures and dividends, on both allocated and unallocated shares, in the measurement of ESOP costs charged directly or indirectly to Federal contracts or similar cost objectives for each plan identified.					
	J.	Administrative Costs. Describe how the costs of administration of each plan listed ar identified, grouped, and accumulated.					

PART VII - DEFERRED COMPENSATION AND INSURANCE COST

	REQUIRED BY PUBLIC	LAW 100-079					
item No.		,	Item (description			
7.6.0	.0 Worker's Compensation, Liability, and Property Insurance. Does your organization have insurance coverage regarding worker's compensation, liability and property insurance?				surance		
	A Yes (Complete Item 7.6.1.)						
	B No	(Proceed to Par	t VIII)				
7.6.1	Worker's Compensation,	Liability and Pro	perty ir	surance Cov	rerage.	. -	
	For each line of it fire and similar perils, aur information below on a cuthan three policies or set information for all the polinsurance plans, information aggregate account for at each line of insurance identification.	tomobile liability continuation shee f-insurance plans licies and self-in tion should be p least 80 percen	and pro et using s that as surance rovided	perty damag the codes d re applicable plans. If th for those po	e, general escribed be to the line ere are mod licies and s	iow: (if there are of insurance, pro- re than three polic elf-insurance plan	the not more vide ies or s that in the
	Description of Line of Insurance Coverage:						
				Crediting of Dividends	Self-Insurance Projected Insurance		
	Policy or Self- Insurance Plan	Cost Accumulation (1)	Cost Basis (2)	and Earned	Average Loss (4)	Administrative Expenses (5)	
		Colum	ın (1) —	Cost Accum	ulation		
	Enter code A, B, or Y, as appropriate.						
	A. Costs are	accumulated at	the Ho	me Office.			
	B. Costs are Y. Other 1	accumulated at	Segme	nt			
	Column (2) Cost Basis						
	Enter code A, B, C, or Y, as appropriate.						
	A. Purchased insurance from unrelated third party						
		B. Self-insurance					
		C. Purchased Insurance from a captive insurer Y. Other 1/					
	·						
						-	
	1/ Describe on a Contin	uation Sheet.					

		STANDARDS BOARD	PART VII - DEFERRED COMPENSATION AND INSURANCE COST			
		STATEMENT LIC LAW 100-679	NAME OF REPORTING UNIT			
item No.	Item description					
7.6.1	Continued.					
		Column (3) <u>Crediting of</u>	Dividends and Earned Refunds			
	For each line	of coverage listed, enter co	de A, B, C, D, E, Y, or Z, as appropriate.			
	A. Credit	-	Federal contracts or similar cost objectives in the year			
· ·	B. Credit		Federal contracts or similar cost objectives in the year			
		ed each year, as applicable	, to currently reflect the net annual cost of the			
	D. Not c		contractor but retained by the carriers as reserves in			
		ally Rated - not applicable	10-20/aV 1Vin)			
		, or more than one 1/				
	Z. Not a	pplicable				
	Column (4) — Projected Average Loss					
		insured group plan, or the s Y, or Z, as appropriate.	self-insured portion of purchased insurance, enter			
	A. Costs that represent the projected average loss for the period estimated on the basis of the cost of comparable purchased insurance.					
		pated conditions in accorda	tractor's experience, relevant industry experience, and nee with generally accepted actuarial principles and			
	C. The a		considered to represent the projected average loss for			
		, or more than one method	. 1 /			
	Z. Not a	pplicable				
		Column (5) <u>Insuran</u>	ce Administration Expenses			
	For each self- code A, B, C	insured group plan, or the , D, Y, or Z, as appropriate,	self-insured portion of purchased insurance, enter to indicate how administrative costs are treated.			
	Separately identified and accumulated in indirect cost pool(s). Separately identified, accumulated, and allocated to cost objectives either at the segment and/or home office level (Describe allocation method on a Continuation).					
	•	eparately identified, but inc	luded in indirect cost pool(s). (Describe pool(s) on a			
	D. Incun		or third party. (Describe accumulation and accumulation)			
	Y. Other	ss on a Continuation Sheet	J.			
		pplicable				
			-			
	1/ Describe on a	Continuation Sheet.				

COST ACCOUNTING STANDARDS BOARD PART VIII - HOME OFFICE EXPENSES DISCLOSURE STATEMENT NAME OF REPORTING UNIT **REQUIRED BY PUBLIC LAW 100-679** Item No. Item description Part VIII instructions FOR HOME OFFICE. AS APPLICABLE (Includes home office type operations of subsidiaries. joint ventures, partnerships, etc.). 1/ This part should be completed only by the office of a corporation or other business entity where such an office is responsible for administering two or more segments, where it allocates its costs to such segments and where at least one of the segments is required to file Parts I through VII of the Disclosure Statement. Data for this part should cover the reporting unit's (corporate or other intermediate level home office's) most recently completed fiscal year. For a corporate (home) office, such data should cover the entire corporation. For a intermediate level home office, they should cover the subordinate organizations administered by that group office. 8.1.0 Organizational Structure. On a continuation sheet, provide the following information: In column (1) list segments and other intermediate level home offices reporting to this home office, 2. In column (2) insert "yes" or "no" to indicate if reporting units have recorded any CAS-covered Government Sales, and 3. In column (3) provide the percentage of annual CAS-covered Government Sales as a Percentage of Total Sales (Government and Commercial), if applicable, as follows: A. Less than 10% B. 10%-50% C. 51%-80% D. 81%-95% E. Over 95% CAS Covered Segment or Covernment Sales as a Other Intermediary Home Office **Government Sales** Percentage of Total Sales 8.2.0 Other Applicable Disclosure Statement Parts. (Refer to page (i) 4., General Instructions, and Parts V. VI and VII of the Disclosure Statement. Indicate below the parts that the reporting unit has completed concurrently with Parts I and VIII.) Part V - Depreciation and Capitalization Practices Part VI - Other Costs and Credits Part VII - Deferred Compensation and Insurance Costs **Not Applicable**

1/ For definition of home office see 48 CFR 9904.403.

		UNTING STANDARDS BOARD	PART VIII - HOME OFFICE EXPENSES				
		LOSURE STATEMENT BY PUBLIC LAW 100-679	NAME OF REPORTING UNIT				
Item No.	Item description						
			-				
8.3.0	Expenses or	Pools of Expenses and Methods of A	location.				
	For c	lassification purposes, three methods	of allocation, defined as follows, are to be used:				
	(i)		that are charged to specific corporate segments or ses based on a specific identification of costs 3;				
	(ii)	(ii) Homogeneous Expense Pools—those individual or groups of expenses which are allocated using a base which reflects beneficial or causal relationships, as described in					
	9904.403; and (iii) Residual Expense—the remaining expenses which are allocated to all segments by means of a base representative of the total activity of such segments.						
	Allocation Base Codes						
	Α.	Sales					
	В.	Cost of Sales					
	C.	C. Total Cost Input (Direct Material, Direct Labor, Other Direct Costs, and Applicable					
	Overhead)						
	D. Total Cost Incurred (Total Cost Input Plus G&A Expenses) E. Prime Cost (Direct Metalid Direct I show and Other Direct Costs						
	E. Prime Cost (Direct Material, Direct Labor, and Other Direct Costs F. Three factor formula (CAS 9904.403-50(c))						
	G.						
	Н.	Direct Labor Dollars					
	I.	Direct Labor Hours					
	J.	Machine Hours					
	K.	Usage					
	L.	Unit of Production					
	M.	Direct Material Cost					
	N.	Total Payroll Dollars (Direct and In					
	0.	Headcount or Number of employer	es (Direct and Indirect Employees)				
	P.	Square Feet					
	Q.	Value Added					
	Υ.	Other, or More than One Basis 1/	÷				
	of expenses listed, also in addition, for or Y, to indic example, if c items listed then list those	or the name of the expense pool(s). Indicate as item (a) the major function items listed under 8.3.2 and 8.3.3 ec cate the basis of allocation and descri ifrect labor dollars are used, are ovetl under 8.3.2 and 8.3.3, if a pool is no se reporting units either receiving or r	he headings 8.3.1, 8.3.2, and 8.3.3 enter the type For each of the types of expense or expense pools is, activities, and elements of cost included. In inter one of the Allocation Base Codes A through Q, the as Item (b) the make up of the base(s). For ime premiums, fringe benefits, etc. included? For it allocated to all reporting units listed under 8.1.0, not receiving an allocation. Also identify special gement charges (see 9904.403-40(c)(3)).				

1/ Describe on a Continuation Sheet.

PART	VIII -	HOME	OFFICE	EXPENSES

		BY PUBLIC LAW 100-679	NAME OF REPORTING	UNIT			
Item No.	Item description						
		Type of Expenses or Name of Pool of	Expenses				
8.3.1	Directly Alloca	ted					
	1.	distribution and the state of t					
	(a)	Major functions, activities, and elemen	ts of cost include:				
	2.						
	(a)	Major functions, activities, and elemen	ts of cost include:				
8.3.2	Homogeneous	Expense Pools	Æ	Mocation Base Code			
	1.	****					
	(a)	Major functions, activities, and elemen	ts of cost include:				
		-					
	(b)	Description/Make up of the allocation	base:				
	2.		<u> </u>				
	(a)	Major functions, activities, and elemer	nts of cost include:				
	(b)	Description/Make up of the allocation	base:				

		INTING STANDARDS BOARD	PART VIII - HOR	PART VIII - HOME OFFICE EXPENSES			
DISCLOSURE STATEMENT REQUIRED BY PUBLIC LAW 100-679			NAME OF REPO	NAME OF REPORTING UNIT			
Item No.	Item description						
	_						
8.3.3	Residual Expe	enses		Allocation Base Code			
	(a)	Major functions, activities, and el	— lements of cost include	:			
	(b)	Description/Make up of the alloca	rtion base:				
8.4.0	office, identif	xpenses. If there are normally transity on a continuation sheet the class the expense.	 sfers of expenses from ification of the expense	reporting units to this home and the name of the reporting			
			-				
	-						
	-						
1	1						