Becoming DCAA Compliant with the TimeControl Timesheet system

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HMS has been designing timesheet systems since we delivered our first mandate in 1984. As a specialist in enterprise project management and timesheet systems, our experience covers a wide range of clients and industries including IT, Research and Development, Health Services,



Government, Construction, Utilities and Aerospace and Defense. HMS has worked with numerous contractors who have had to comply with the United States Defense Contract Audit Agency (DCAA) requirements for corporate timecard reporting.

The Defense Contract Audit Agency is responsible for performing all contract audits for the Department of Defense as well as numerous other US federal agencies including Homeland Security, the Department of Energy and others. In addition to auditing federal contracts, the DCAA provides accounting and financial advisory services regarding contracts and subcontracts to the procurement and contract administration aspects of numerous federal agencies.

Government contractors bidding contracts for the Department of Defense, Homeland Security, the Department of Energy or sub-contractors to those who are bidding on such contracts are typically required to comply with DCAA guidelines and may be subject to DCAA audits.

The DCAA works with contractors to:

- A. Identify and evaluate all activities that either contribute to, or have an impact on, proposed or incurred costs of government contracts.
- B. Evaluate contractors' financial policies, procedures, and internal controls to ensure they comply with DCAA standards
- C. Perform audits which identify opportunities for contractors to reduce or avoid costs.

The DCAA looks at these areas of emphasis:

- Internal control systems
- Management policies
- Accuracy and reasonableness of cost representations
- Adequacy and reliability of records and accounting systems
- > Financial capability
- Contractor compliance with contractual provisions having accounting or financial significance

The extent of the DCAA's involvement is determined by the size and type of contract that will be awarded. In this paper we are referencing standards outlined in the *Information for Contractors Guide* that can be found on the DCAA website at: www.dcaa.mil.

While DCAA guidelines cover many aspect of financial and management controls, this paper will focus on the capture of labor actuals and, in particular, the requirements for a timecard system that are outlined in the Information for Contractors guide.

The DCAA does not endorse software systems nor identify those systems that may be used for DCAA compliance. Instead, the Agency focuses on the process that the contractor has implemented to ensure they comply with the DCAA standards. While it is possible for a contractor to be compliant with a paper-based timecard system, most contractors will wish to automate this process and ensure that the system they are automating with is able to support the DCAA compliant process the contractor has designed.

While there may be many aspects of a contractor's financial and project environment that are reviewed by the DCAA, this paper will focus on the timesheet requirements only.

DCAA Timesheet Compliance Criteria

One of the more significant challenges for contractors to comply with DCAA standards is the Labor Charging System. Labor costs in a significant project are often the largest and riskiest component. Unlike other costs, labor is not supported by external documentation such as a purchase order and invoice or physical evidence to provide an independent check or balance. The DCAA believes the key to any sound labor time charging system resides with the individual employee. Their processes therefore make the individual employee responsible for accurately recording time charges. Controls required by the DCAA to track labor costs are based on a timecard system and trace back to the person who actually did the work. Audits for labor costs are designed to guard against fraud and waste in the labor charging function. Here are some of the key criteria identified by the DCAA¹ for a timesheet system:

- 1. Detailed instructions for timecard preparation should be established within company procedures and provided to the employees.
- 2. There should be a separation of responsibilities for timekeeping and payroll
- 3. The employee is personally responsible for:
 - a. Recording his/her time on a daily basis;
 - b. Recording his or her own time on the timecard
 - c. The employee must approve changes to their own timecard;
 - d. Certifying the timecard at the end of each work period.
- 4. When it is changed, the original time charge, the corrected time charge, and documentation from the employee indicating his/her concurrence with the change must be recorded
- 5. The contractor should provide the employee with an accurate list of project numbers and assignment identifiers such as a task number
- 6. Hours must be recorded whether they are paid or not.
- 7. Supervisors must approve and co-sign all timecards
- 8. Uncompensated Overtime must be identified
- 9. Supervisors may <u>not</u> complete an employee's timecard unless they are absent for a prolonged period.
- 10. Supervisors may prepare a timesheet for an employee who is travelling which must be signed by the employee upon their return.
- 11. Time entered on timesheets should be distributed based on the work done, not based on the type of funding, type of contract or availability.
- 12. The contractor policy should state that accurate and complete preparation of timecards is a part of the employee's job. Careless or improper preparation may lead to disciplinary actions under company policies, as well as applicable Federal statutes.

¹ DCAA "Information for Contractors" from DCAAP_7641.90 (June 2012)

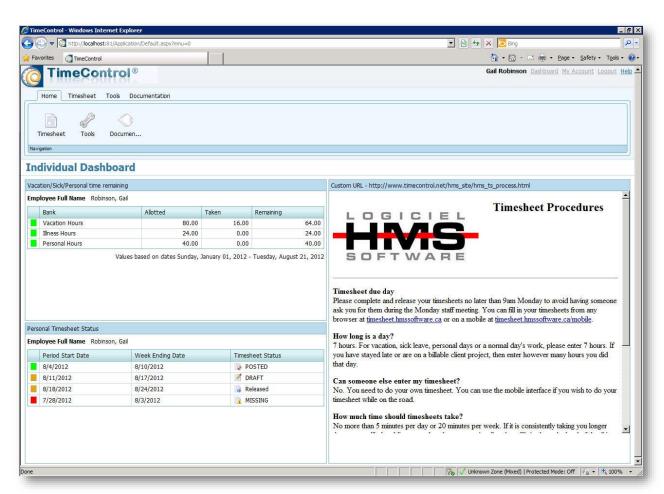
Configuring the TimeControl Timesheet for DCAA Compliance

Over the next few pages, we'll look at how HMS Software's TimeControl responds to these key criteria of the DCAA's requirements for a timesheet.

Timesheet procedures

Each organization must define its own company procedures for timecard entry. Communicating that procedure can be done directly inside TimeControl. The setup of TimeControl can determine what is possible and what is not for timesheet entry, for approvals and for reporting of timesheet data. Data can then be automatically sent to payroll, to project management and to corporate billing systems ensuring that a single source of data is used for all these purposes. The result is a highly auditable timesheet system.

Procedures that must be communicated to the end user can be put directly into the flexible menu system or right onto the TimeControl dashboard as a document.



Separate timekeeping and payroll responsibilities

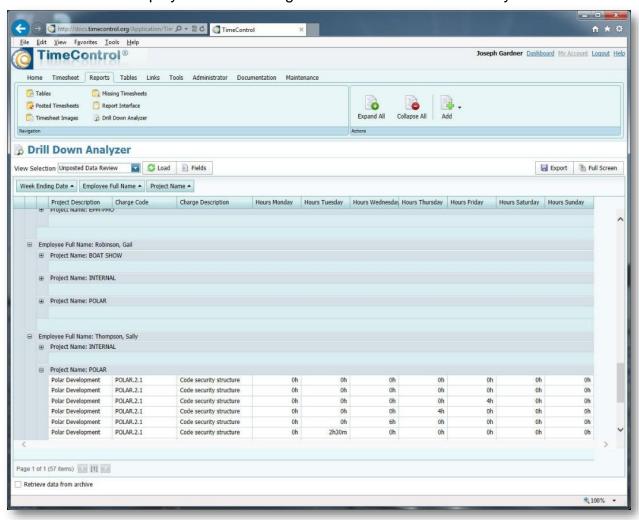
TimeControl is a multi-purpose timesheet that is not controlled just by the payroll function. As a source of data for payroll, project progress and ultimately government contract billing,

TimeControl fulfills the separation of payroll and timekeeping functionality. This rule becomes a concern for the DCAA when payroll data is devolved to what "should" have been invoiced and that then becomes the government invoice. Payroll timesheet systems that only track attendance are deficient in this area. Because TimeControl can track not just if an employee was present but also what they did with their time, it is best suited to meet this challenge.

Auditable records from TimeControl can show that the employee themselves entered their timesheet, that they have reported on what tasks were progressed during the day and, if this same data is used for payroll, can show how the employee's time balances against the payroll records.

Employee must enter timesheet data daily

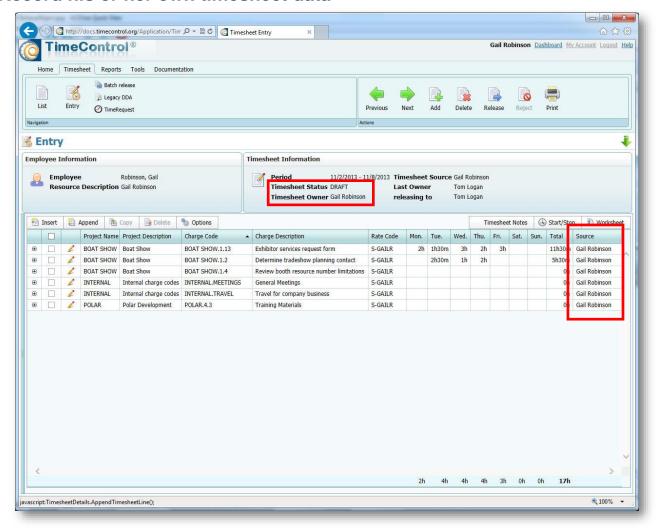
The DCAA knows that entering timesheet data on a daily basis will result in a more accurate accounting by the employee of what time was spent on that day. DCAA standards are to have timesheet data entered daily. The Labor Charging System should have an ability to report on the status of which employees are entering their timesheet data on a daily basis.



This is the TimeControl Drill Down Analyzer view of timesheets in progress on a daily basis. TimeControl data can be entered daily and submitted weekly but this unposted data view shows data that is in draft mode for each employee on a daily basis. Administrators can verify at any time of who has entered their timesheet data for today. Additionally, exception reports

or filters can be created which show a list of users who have not entered timesheet data for a particular day.

Record his or her own timesheet data

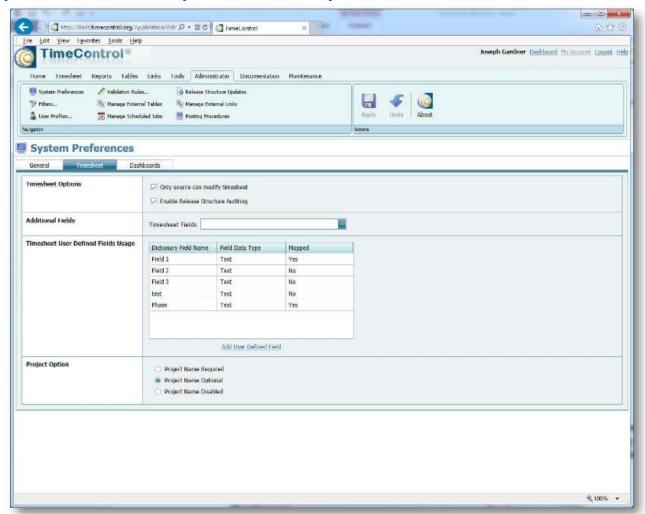


Once data has been entered in TimeControl, the source of the timesheet document and the source of *each* timesheet line is identified. When a user logs into TimeControl with their unique User name and Password, they ensure that the data that is entered is entered by them alone. Even when a timesheet is submitted for approval to a supervisor or other administrator, the original lines cannot be deleted by another user, even a supervisor. This fulfills the DCAA requirement that timecards are not entered or altered by others without the consent or knowledge of the employee who did the work.

Employee must approve changes to their timesheet

When adjustments to a timesheet are made by a supervisor or other manager, the Labor Charging System must be able to show those changes to the employee and the employee must agree to those changes. In TimeControl we must show who made the change and show that the employee has approved the changes. We configure this in TimeControl with two settings:

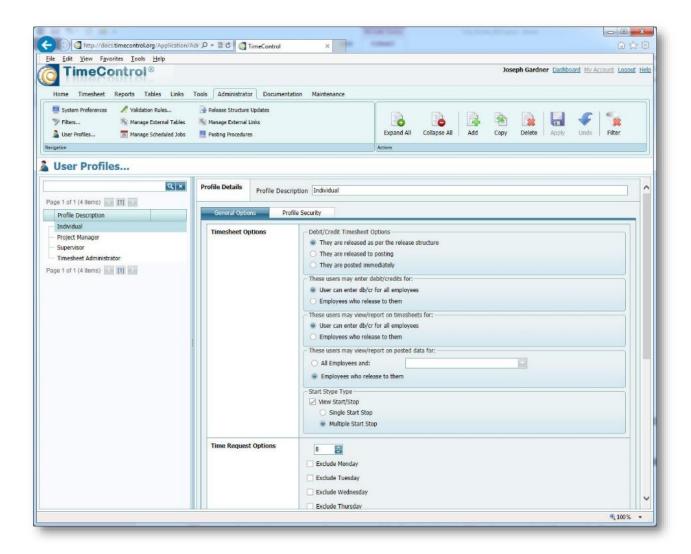
System Preferences: Only source can modify timesheet



This System Preferences setting is a global setting affecting this entire instance of TimeControl. It ensures that no one but the original creator of the timesheet can change it. This information is maintained in the header of the timesheet. If this setting is flagged, even if a supervisor has control or ownership of a timesheet for approval, they are unable to delete, alter or add any lines to the timesheet.

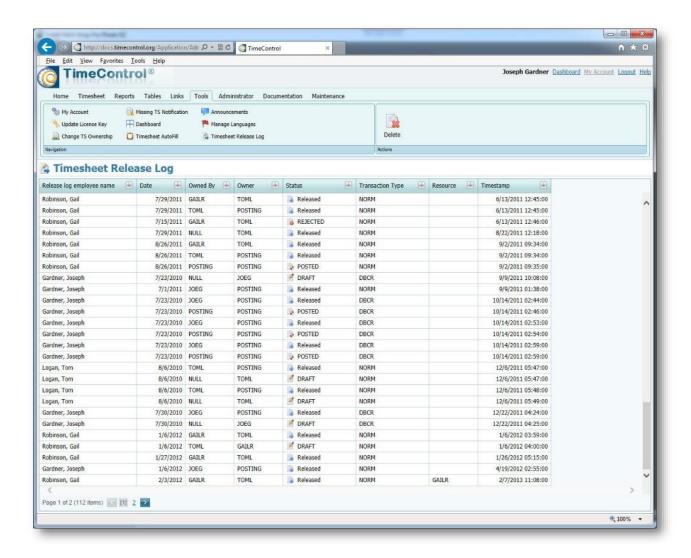
User Profiles: Debit / Credit Timesheet Options

In TimeControl, a User Profile controls how TimeControl will appear, and how functions will work for a group of users. In this case we wish to ensure that when a change to the timesheet is made after it was posted that the change is sent to the employee. In TimeControl changes made to a timesheet after posting are done in a function called *Debit/Credit*. In the User Profiles for supervisors or managers who are permitted to make changes, we go to the General Settings and the Debit/ Credit Timesheet Options section. Selecting "They are released as per the release structure will send a Debit Credit to the original source of the timesheet; the employee and then the regular approval mechanism is respected. In this way we can ensure that no matter when a change is made, the employee will be able to approve it.



Certifying the timesheet

TimeControl's highly secure log in and auditing functionality determines that no one other than the logged in user can effect new entries and changes to a timesheet. When a user releases their timesheet for approval, a log is created to show who released the timesheet, to whom it was released and when.

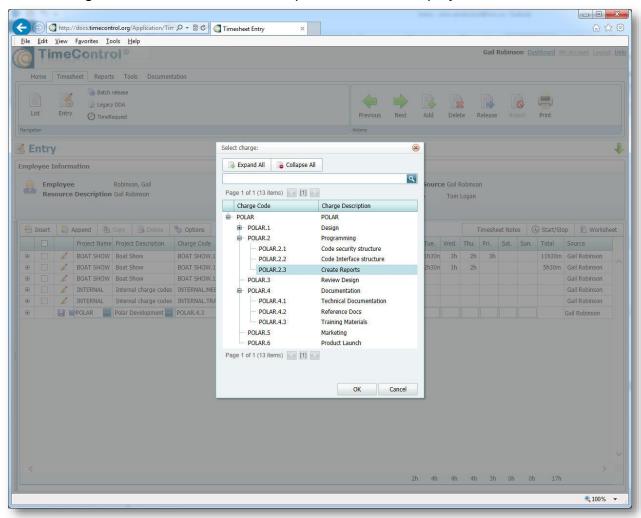


This type of electronic sign-off allows users to certify their data as only their username and password can be used to effect the release of the timesheet.

Even if a user has logged in as a delegate of another user (such as one on supervisor replacing another during a vacation), the audit is maintained. TimeControl will show both the original user who had the authority to do the approval and the user name of the delegate who actually performed the action.

Accurate project numbers and assignment identifiers

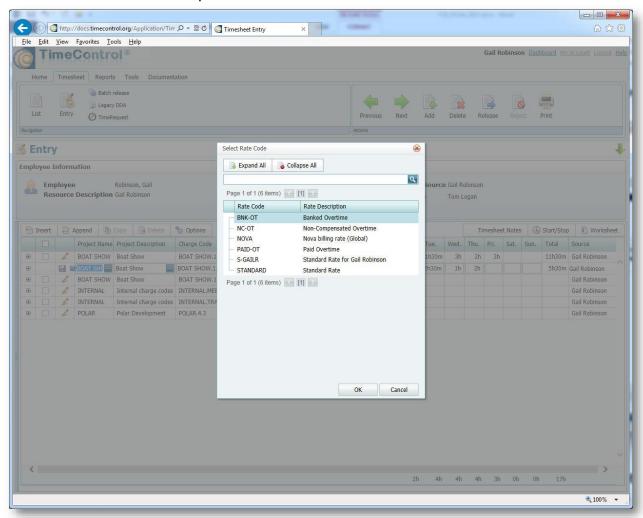
The DCAA insists that the employee record an accurate distribution of their time using project, task and assignment identifiers that will be provided to the employee.



TimeControl maintains a list of all project and charge code numbers which are available in a hierarchical display. If a project or charge number is unopened or closed by an administrator, it can be hidden from view to avoid improper charging to it. This pop-up list can also be maintained automatically from a project management system.

Record both paid and unpaid hours

The DCAA wants to make sure there is a complete accounting of hours on a project. An employee who works overtime must record those hours even if they are not paid for them. The DCAA uses the term "Uncompensated Overtime" for such an event.

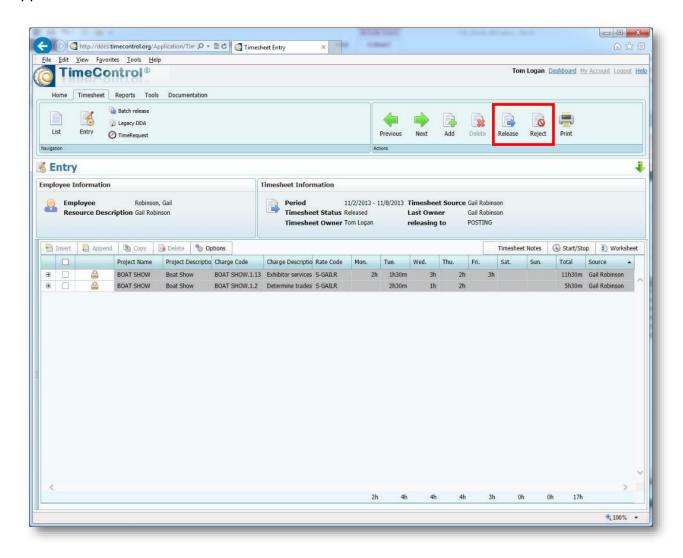


TimeControl's extensive rate management system allows an unlimited number of rates per employee. This allows an organization to create rates for regular work, rates for unpaid work and rates for both compensated and uncompensated overtime. Automated Business Validation rules can be entered into TimeControl which control when such rates may be used. (For example, perhaps overtime is not permitted until there are 40 hours of regular paid time.) In addition, this structure allows TimeControl to support banked overtime, uncompensated overtime and time off taken in lieu of extra time spent. This screen shows a rate selection for a timesheet line for a employee's timesheet.

Supervisor approval of timesheets

TimeControl's extensive approval process includes support for an unlimited hierarchy of supervisory approval as well as our trademarked "Matrix Approval Process for Labor Actuals™". Supervisory approvals can be defined uniquely by employee so that not everyone is required to have the same approval path or even the same number of levels of approvals.

Supervisors in a DCAA environment may either approve or reject a timesheet from an employee. If they reject it, they can also automatically send an email to that employee letting them know that their timesheet was rejected and informing the employee what needs to be corrected. The employee can then change and resubmit the timesheet and an auditable record of when the timesheet was first submitted, then rejected, then later submitted and approved is maintained.



Supervisors entering timesheets for absent employees

In a DCAA compliant environment, supervisors may not complete an employee's timecard unless they are absent for a prolonged period².

TimeControl includes functionality for supervisors to enter timesheets on behalf of their employees however, if a supervisor attempts to do so, an audit is maintained of who created the timesheet and who entered each line of the timesheet so a supervisor cannot enter a timesheet on behalf of an employee without this being recorded. If an employee is absent for

² DCAA "Information for Contractors" from DCAAP 7641.90 (June 2012)

a prolonged period, a supervisor or administrator can create timesheets on behalf of the employee if required but the source enterer of the timesheet will be the supervisor or administrator.

Supervisors preparing a timesheet for an employee who is travelling

TimeControl allows a timesheet to be created by a supervisor which would then be verified by an employee either before or after posting. The source of the timesheet is the key element here and ensuring that the employee has seen the information. In a modern age of Internet communication however, this criteria is rarely a challenge as TimeControl could be accessed from almost anywhere in the world there is Internet access.

Time entered should be based on work done

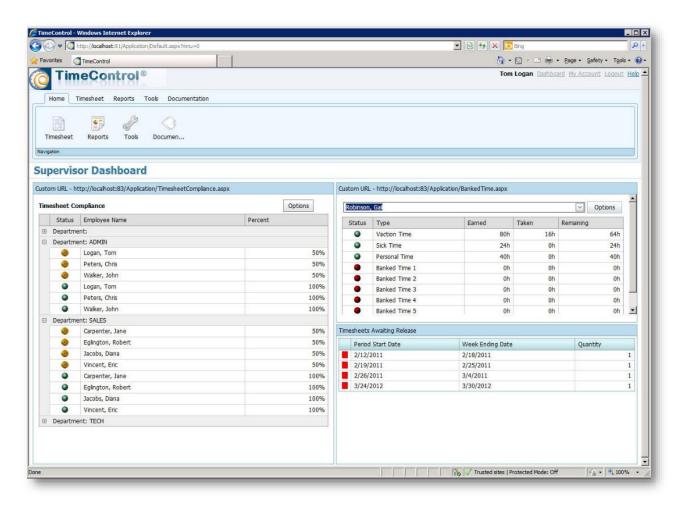
This is the key advantage and a key element of the TimeControl design. TimeControl is built around the concept of tracking not just when an employee was at work but what they did with their time while they were there. When linked to a list of charges from Finance or Project Management, fulfilling this criteria is natural for the employee and provides the added benefit of tracking progress against the task.

Accurate timesheets are part of the employee's job

Just as we mentioned on the very first item, the corporate timesheet policy can be identified right in the TimeControl dashboard. Aside from the policy itself however, there are several functions within TimeControl which lend themselves well to being compliant with the DCAA directives:

- A missing timesheet email notification can be sent to remind employees who's timesheets are absent that they must complete them.
- A missing timesheet report can identify any employees who are out of compliance and ensure that 100% of timesheets have been collected
- A preset list of charges that are sourced either from Finance or from Project Management ensures that charges exist and are accurate.
- > TimeControl validation rules ensure that rules for entering timesheets have already been followed

The TimeControl dashboard can also aid in compliance by showing both supervisors and individuals whether their timesheet is still missing or still not approved as well as show other compliance information.



TimeControl DCAA Compliance Checklist

Here is a list of TimeControl setup steps that would need to be accomplished during a TimeControl deployment in a DCAA compliant environment:

- Set System Settings to "Only Source May Modify Timesheet"
 This will ensure that only the employee who creates a timesheet can change it.
- Set System Settings to "Release Debit/Credit to original release path"
 This will ensure that any post-period adjustments are sent to the employee for review and approval.
- Create a daily timesheet entry report or use the Drill Down Analyzer on unposted data to show who has entered timesheets each day This will make sure that you're following employee compliance on entering their timesheet daily.
- Set System Settings to Turn Logging on.
 This will make sure you can get an audit of who entered, released and approved timesheets.
- Create a timesheet entry process and make it available on the TimeControl dashboard and/or make it part of employee training to ensure that all employees are informed of your timesheet process.

Since its first release in 1984, TimeControl has been used by numerous organizations as part of a DCAA compliant environment. Meeting DCAA compliance for timesheets can seem a daunting task but TimeControl deployments can be accomplished in a very short amount of time.

TimeControl makes entering timesheets simple for the end user yet carries the robust functionality required for administrators to integrate it into the Finance, Project Management, Billing and Payroll functions in the background, providing a single source of data that is so critical to an effective organization today.

To find out more about TimeControl, contact info@hmssoftware.ca, visit the TimeControl website at www.timecontrol.com or call us at 514-695-8122 and ask to talk to an HMS representative about "Becoming DCAA compliant with TimeControl."

TimeControl Feature List

Easy to use Interface

- Full web-based browser interface with multiple browsers supported
- TimeControl can be implemented within a SharePoint interface or a Microsoft Project Web Access interface
- Scaleable user profiles facilitates use for data entry users yet provides full functionality for administrators
- Multilingual
- Unlimited charge codes displayed in simple, hierarchical drop-down lists
- Unlimited free-form notes for each line item and each timesheet
- E-mail-enabled. E-mail messages sent for system notices such as rejected timesheets or missing timesheets
- Scheduleable E-mail notification for missing or unapproved timesheets.
- Predefined timesheets based on resource assignments from the project management system or by user input
- TimeControl Mobile™ web interface for smartphones included

Robust Architecture

- Open database architecture; support for Oracle,
 Microsoft SQL Server, Sybase and MySQL datazbases
- N-tier architecture makes system scaleable for 10 to 100,000 users
- Unlimited rate codes per employee
- Field-level security. Make any field visible, value readonly, or invisible
- Complete redefinition of every field label
- Complete auditability of timesheet data
- User-defined fields on every table
- Add pop-up data validation for each user-defined field
- Allows charges to be linked to a specific project or project-independent
- Multiple overhead charge types
- Filter charge codes, projects and rates visible to any employee

Web Interface

 MyTimeControl[™] home page dashboard gives extensive and customizable dashboard information to employees

Approval Process

- HMS's unique Matrix Approval Process for Labor Actuals™
- Unlimited automatic Validation Rules are user defineable, flexible and can be applied globally or to any group or even an individual

- Unlimited manual validation levels in which each employee can have a unique approval routing
- Project Managers or Account Managers can preview and redistribute hours prior to linking with a project management system or exporting to Finance

Links to Project Management

- Direct integration with popular project management systems such as Microsoft Project and Project Server, Oracle-Primavera, Hard Dollar's HD and Deltek's Open Plan and Cobra
- Supports multiple project management systems and multiple versions simultaneously
- Customizable import/export function to interface with virtually any finance or ERP system including SAP, Oracle, PeopleSoft and Microsoft Dynamics
- Interface can be stand alone or integrated directly into SharePoint, Microsoft Project Web Access

Time-off Request

- TimeRequest[™] module allows vacation, personal or other leave time to be requested
- TimeRequest allows multiple levels of approval
- TimeRequest automatically populates future timesheets with approved time off

Flexible Reporting

- Excel-like reporting format allows output to any Windows-compliant printer or can be saved as Excel, XML or HTML files
- Reporting Wizards allow an unlimited number of reports to be created and saved for later use
- Unlimited levels of data selection, filtering and sorting
- Drill Down Analyzer provides instant ad-hoc analysis of data at any level

Expense Reports

- Users can enter non-labor costs on their timesheet
- Unlimited number of expense items per timesheet line item
- Expenses can be tracked back to a project management and/or finance system

Government Compliance

 Complies with requirements for DCAA, European Time Directives, R&D tax credits, FMLA, the California Wage Laws and Sarbanes-Oxley

Purchase or subscribe

- Purchase TimeControl for an on-premises installation or:
- Subscribe to TimeControlOnline™, our hosted timesheet solution in the cloud

HMS Software Partial Client List

Engineering/Construction

AeroInfo Koch Business Solutions Floatec JRI Engineering (Chile) Ringway Jacobs (UK)

BNS Nuclear Foster Wheeler

Gas / Utilities

Gulf South Pipeline Acergy Petrocon logen

Manufacturing

Rio Tinto Alcan Parker Hannifin Georgia Pacific Tennant Wagner Spray Tech Vision Systems Volvo-Novabus

Defense / Aerospace

CAE Electronics (Australia)
NASA
General Motors Diesel
Lockheed Martin
Army Corps of Engineers
Electromotive Diesel
Rolls Royce
Safran

Government

Atlanta Airport
Dutch Railways
Toronto Transit Commission
Government of Saskatchewan
Railway Procurement Agency (UK)
City of Montreal
County of San Mateo
DEQ (Idaho Dept. of Environmental Quality)

Technology

FACE Technology (South Africa)
Fuel Plus Software
GE
Scheidt Bachmann
Thompson Beta
Data Respons (Norway)
Microsoft
CRIM Montréal

Telecommunications

EXFO Stratos Global SARA Amsterdam Flextronics

Financial

Standard Life
Dundee Wealth
MCAP
Residential Mortgage
Value Recovery

Health/Pharmaceutical

Boehringer Ingelheim National Health Service (UK) Azko Nobel (Organon) RTS Thurnall Canadian Institute for Health Info Iogen Registrat

Other

Kelly Services
Steven Winter
Department of Education (UK)
Fisher German
Agropur
Johnson and Wales University

HMS Software, a division of Montreal, Canada-based Heuristic Management Systems Inc., is a leading provider of enterprise timesheet and project management OGICIEL systems.

Founded in 1984, HMS Software's expertise in implementing enterprise project-management and enterprise timesheet systems is recognized worldwide by some of the world's best known organizations. HMS's signature product, TimeControl, an enterprise timekeeping system designed to serve the needs of both Finance and Project Management, is distributed worldwide through an extensive list of distributors and dealers located on every continent with representatives in the US, the UK, Australia, Mexico, Europe, Asia, South Africa and the Middle East.

HMS Software's client list includes some of the world's leading corporations in the telecommunications, IT, finance, engineering, defense/aerospace and government sectors including such organizations as Acergy, Aecon Construction, Alcan, the Atlanta Airport, Akzo Nobel, The Canadian Business Development Bank, The City of Montreal, EDS, Ericsson, General Motors, the Government of Saskatchewan, John Deere, Kelly Services, The UK's National Health Service, Standard Life, UPS, Volvo Novabus and hundreds of others. HMS maintains offices in Montreal, Quebec and Toronto, Ontario.

For more information about HMS, please visit www.hmssoftware.ca.

TimeControl

First published by HMS in 1994, TimeControl has been adopted hundreds of clients and over 150,000 users around the world. TimeControl is designed to serve the needs of both project and finance simultaneously. It allows an organization to use a single timesheet for project tracking, time and attendance, time and billing, HR tracking, R&D Tax Credits, DCAA and project costing instead of having to deploy many timesheets to serve these needs. TimeControl is available for purchase for an on-premises implementation or as a subscription as service. TimeControl's architecture is flexible and extensive supporting numerous databases such as Oracle, Microsoft SQL Server and MySQL, multiple browsers such as Internet Explorer, Firefox, Safari and Chrome and even includes a mobile interface for **Smartphones**

For more information about TimeControl please visit: www.timecontrol.com.

Strategic Services

In addition to being a publisher of one of the world's best known timesheet systems, HMS provides a full range of support services including technical support, training and consulting tailored to meet clients' specific needs. HMS Software consultants are skilled in activity-basedcosting, timekeeping methodology, project management techniques, cost and earned-value management as well, of course, in the HMS-supplied products.

For more information about HMS Software services, please visit www.hms.ca.