In a shocking display of activity, the CAS Board recently **published** a new Staff Discussion Paper (SDP) addressing possible revisions to Standards 404 and 411. As has been the recent trend, CASB published the news on the Federal Register but forgot to actually, you know, publish the SDP. But a link to the SDP was included! The link took one to the OMB site on whitehouse.gov, where it turned out the SDP hadn't actually been uploaded yet.

Yes, you read that correctly. The Federal Register notice contained a link that took you nowhere.

Nice.

But a couple of days later, the SDP **appeared** . Yay!

Now you might think a complaint about a couple of days of missing SDP is just nitpickery. But remember, there is only a 60-day comment period available. Even a loss of two or three days can be enough to impact the public's ability to comment. Therefore, in our view it's not nitpickery; it's a legitimate complaint that the CASB's decision to publish the SDP outside of the Federal Register is a decision to undermine the public's right to provide comment. This is especially important when the *entire purpose* of the SDP is to solicit public input.

Indeed, after literally six months of no apparent CASB activity, the SDP promised by the previous (March 13, 2020) SDP finally showed up. Just in time for the CASB to claim credit for doing something in GFY 2020.

But the new SDP actually doesn't do anything. It just asks questions about Cost Accounting Standards 404 and 411. The questions are seemingly intended to provide input to the CAS Board about whether GAAP is sufficient (standing alone) to protect the government's contractor cost accounting interests, or whether the rigors of CAS are necessary. Remember, Congress already directed CASB to conform GAAP with CAS—it's a public law requirement—but apparently the CASB wants to be *really sure* that Congress actually meant what it put into the law.

In fairness, the SDP is a required step in the CASB rule-making process. You know, the one required by yet another public law. Apparently, CASB is *very focused* on complying with that particular public law, even as it delays complying with the more current one.

This second SDP asks questions. If you are a CAS-covered contractor, or think you may become one someday, you should read the questions and respond. Your input is being solicited.

Be advised, however, that if recent history is any predictor of future history, it will be a long time before CASB actually does anything with your input. You need to know that going in. CASB rule-making is moving at the speed of molasses. Molasses being poured at the North Pole.

One reason the Board may be moving so slowly is that the industry representative has been missing in action since Ms. Schmidgall (Boeing) departed after expiration of her term. From what we've been able to gather, there has been *absolutely no forward progress* made in choosing her replacement. Again, this seems to be the new normal for the CAS Board. Indeed, many observers credit Ms. Schmidgall for most of the recent CASB activity; it's of little surprise to see CASB stalled after her departure.

Anyway, CAS 404 and 411 Staff Discussion Paper. Asking questions. Which may lead to another SDP or perhaps to an Advance Notice of Rule-Making (ANPRM). Or not.

Depends on whether CASB feels like doing anything next year.