



COMMITTEE OF SPONSORING
ORGANIZATIONS OF THE TREADWAY COMMISSION

Internal Control–Integrated Framework

May 2013



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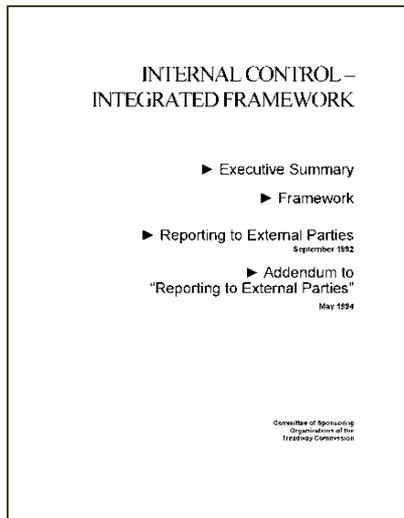
- COSO & Project Overview
- Internal Control-Integrated Framework
- Illustrative Documents
 - Illustrative Tools for Assessing Effectiveness of a System of Internal Control
 - Internal Control over External Financial Reporting: A Compendium of Approaches and examples
- Transition & Impact
- Recommended Actions
- Questions & Comments



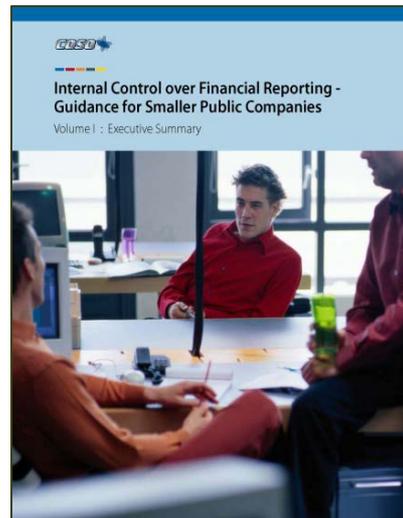
COMMITTEE OF SPONSORING
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COSO & Project Overview

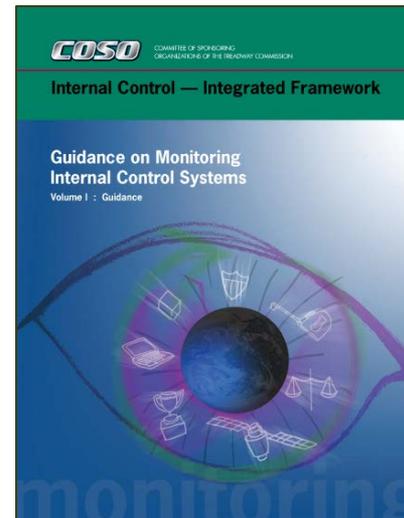
COSO Overview – Internal Control Publications



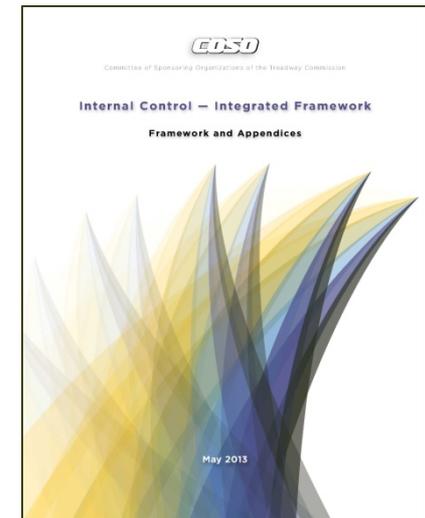
1992



2006



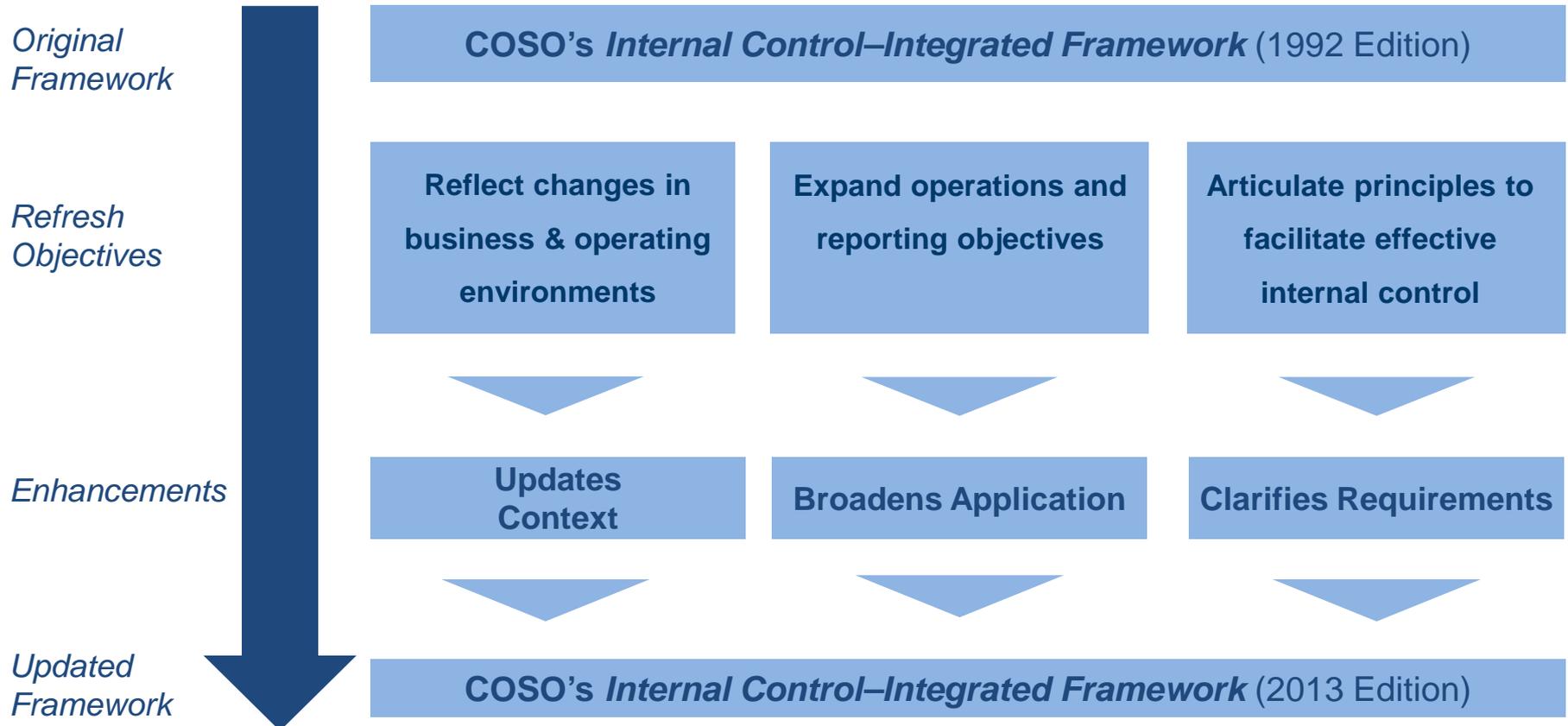
2009



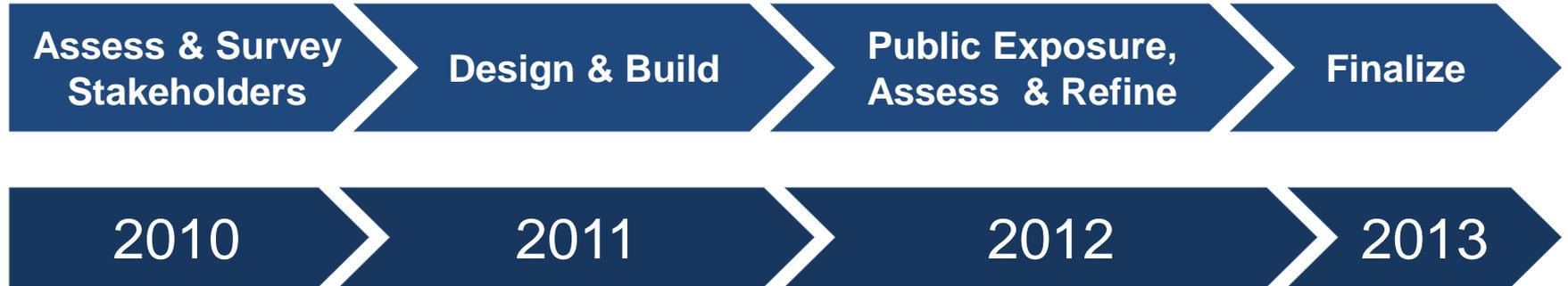
2013



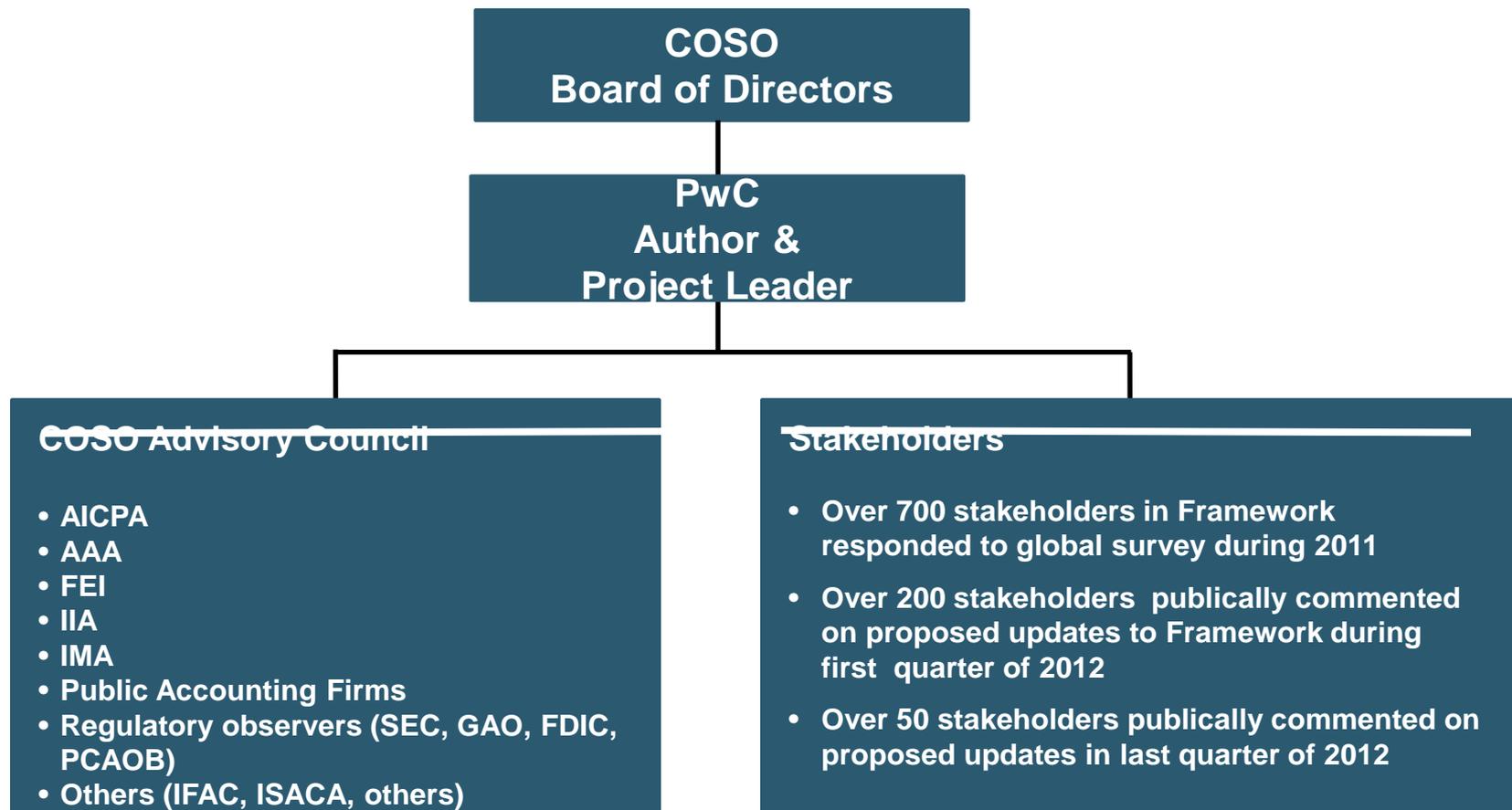
Why update what works – The Framework has become the most widely adopted control framework worldwide.



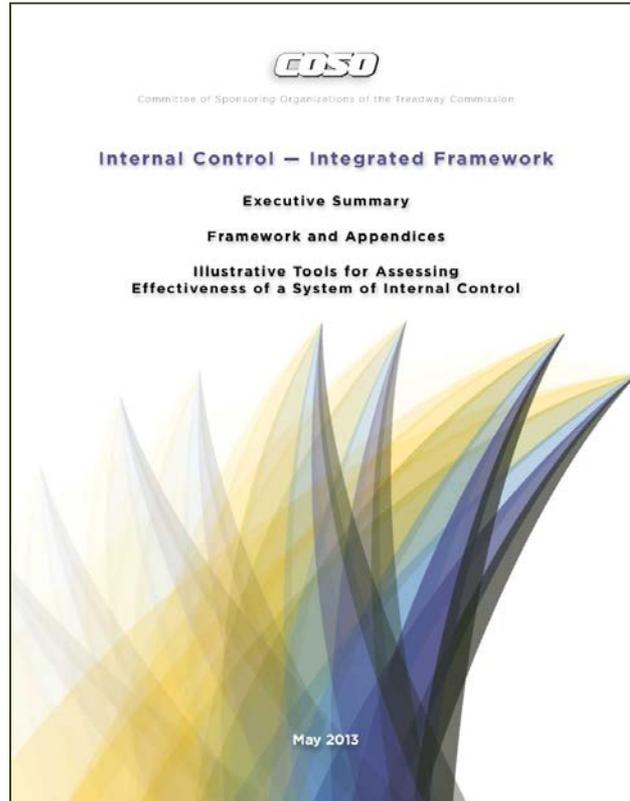
Project timetable



Project participants

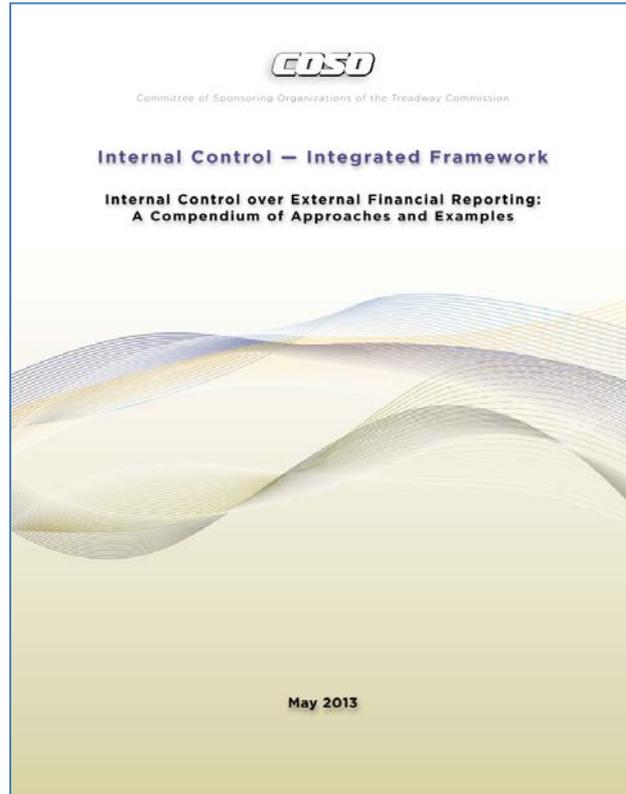


Project deliverable #1 – Internal Control-Integrated Framework (2013 Edition)



- Consists of three volumes:
 - Executive Summary
 - Framework and Appendices
 - Illustrative Tools for Assessing Effectiveness of a System of Internal Control
- Sets out:
 - Definition of internal control
 - Categories of objectives
 - Components and principles of internal control
 - Requirements for effectiveness

Project deliverable #2 – Internal Control over External Financial Reporting: A Compendium....



- Illustrates approaches and examples of how principles are applied in preparing financial statements
- Considers changes in business and operating environments during past two decades
- Provides examples from a variety of entities – public, private, not-for-profit, and government
- Aligns with the updated Framework



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Internal Control–Integrated Framework

Update expected to increase ease of use and broaden application

What is not changing...

- Core definition of internal control
- Three categories of objectives and five components of internal control
- Each of the five components of internal control are required for effective internal control
- Important role of judgment in designing, implementing and conducting internal control, and in assessing its effectiveness



What is changing...

- Changes in business and operating environments considered
- Operations and reporting objectives expanded
- Fundamental concepts underlying five components articulated as principles
- Additional approaches and examples relevant to operations, compliance, and non-financial reporting objectives added

Update considers changes in business and operating environments

Environments changes...

Expectations for governance oversight

Globalization of markets and operations

Changes and greater complexity in business

Demands and complexities in laws, rules, regulations, and standards

Expectations for competencies and accountabilities

Use of, and reliance on, evolving technologies

Expectations relating to preventing and detecting fraud

...have driven Framework updates



COSO Cube (2013 Edition)



Update articulates principles of effective internal control

Control Environment

1. Demonstrates commitment to integrity and ethical values
2. Exercises oversight responsibility
3. Establishes structure, authority and responsibility
4. Demonstrates commitment to competence
5. Enforces accountability

Risk Assessment

6. Specifies suitable objectives
7. Identifies and analyzes risk
8. Assesses fraud risk
9. Identifies and analyzes significant change

Control Activities

10. Selects and develops control activities
11. Selects and develops general controls over technology
12. Deploys through policies and procedures

Information & Communication

13. Uses relevant information
14. Communicates internally
15. Communicates externally

Monitoring Activities

16. Conducts ongoing and/or separate evaluations
17. Evaluates and communicates deficiencies

Update articulates principles of effective internal control (continued)

Control Environment

1. The organization demonstrates a commitment to integrity and ethical values.
2. The board of directors demonstrates independence from management and exercises oversight of the development and performance of internal control.
3. Management establishes, with board oversight, structures, reporting lines, and appropriate authorities and responsibilities in the pursuit of objectives.
4. The organization demonstrates a commitment to attract, develop, and retain competent individuals in alignment with objectives.
5. The organization holds individuals accountable for their internal control responsibilities in the pursuit of objectives.

Update articulates principles of effective internal control (continued)

Risk Assessment

6. The organization specifies objectives with sufficient clarity to enable the identification and assessment of risks relating to objectives.
7. The organization identifies risks to the achievement of its objectives across the entity and analyzes risks as a basis for determining how the risks should be managed.
8. The organization considers the potential for fraud in assessing risks to the achievement of objectives.
9. The organization identifies and assesses changes that could significantly impact the system of internal control.

Update articulates principles of effective internal control (continued)

Control Activities

10. The organization selects and develops control activities that contribute to the mitigation of risks to the achievement of objectives to acceptable levels.
11. The organization selects and develops general control activities over technology to support the achievement of objectives.
12. The organization deploys control activities through policies that establish what is expected and procedures that put policies into place.



Update articulates principles of effective internal control (continued)

Information & Communication

13. The organization obtains or generates and uses relevant, quality information to support the functioning of internal control.
14. The organization internally communicates information, including objectives and responsibilities for internal control, necessary to support the functioning of internal control.
15. The organization communicates with external parties regarding matters affecting the functioning of internal control.

Update articulates principles of effective internal control (continued)

Monitoring Activities

16. The organization selects, develops, and performs ongoing and/or separate evaluations to ascertain whether the components of internal control are present and functioning.
17. The organization evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including senior management and the board of directors, as appropriate.



Update clarifies requirements for effective internal control

- Effective internal control provides reasonable assurance regarding the achievement of objectives and requires that:
 - Each component and each relevant principle is present and functioning
 - The five components are operating together in an integrated manner
- Each principle is suitable to all entities; all principles are presumed relevant except in rare situations where management determines that a principle is not relevant to a component (e.g., governance, technology)
- Components operate together when all components are present and functioning and internal control deficiencies aggregated across components do not result in one or more major deficiencies
- A major deficiency represents an internal control deficiency or combination thereof that severely reduces the likelihood that an entity can achieve its objectives



Update describes important characteristics of principles, e.g.,

Control Environment

1. The organization demonstrates a commitment to integrity and ethical values.

Points of Focus:

- Sets the Tone at the Top
 - Establishes Standards of Conduct
 - Evaluates Adherence to Standards of Conduct
 - Addresses Deviations in a Timely Manner
-
- Points of focus may not be suitable or relevant, and others may be identified
 - Points of focus may facilitate designing, implementing, and conducting internal control
 - There is no requirement to separately assess whether points of focus are in place



Update describes the role of controls to effect principles

- The Framework does not prescribe controls to be selected, developed, and deployed for effective internal control
- An organization's selection of controls to effect relevant principles and associated components is a function of management judgment based on factors unique to the entity
- A major deficiency in a component or principle cannot be mitigated to an acceptable level by the presence and functioning of other components and principles
- However, understanding and considering how controls effect multiple principles can provide persuasive evidence supporting management's assessment of whether components and relevant principles are present and functioning



Update describes how various controls effect principles, e.g.,

Component

Control Environment

Principle

1. The organization demonstrates a commitment to integrity and ethical values.

Controls embedded in other components may effect this principle

Human Resources review employees' confirmations to assess whether standards of conduct are understood and adhered to by staff across the entity

Control Environment

Management obtains and reviews data and information underlying potential deviations captured in whistleblower hot-line to assess quality of information

Information & Communication

Internal Audit separately evaluates Control Environment, considering employee behaviors and whistleblower hotline results and reports thereon

Monitoring Activities



Summary of public exposure of proposed update

- Interest across geographic regions – approximately 50% of respondents from North America and 50% from international regions
- Proposed updates to Framework released for public comments:
 - December 20, 2011 to March 31, 2012
 - September 18, 2012 to December 4, 2012
- COSO sought comments from the general public on proposed updates, including whether the:
 - Requirements of effective internal control are clearly set forth
 - Roles of components, principles, and points of focus are clearly set forth
 - Framework remains sound, logical, and useful to management of entities of all types and sizes
- Public comment letters available at www.ic.coso.org until Dec. 31, 2013



Updates are responsive to public comments

- Principles
 - Provide clarity regarding the role of principles in designing, implementing, and conducting internal control, and assessing its effectiveness
 - Clarify descriptions of some principles, but no additional principles
- Effectiveness
 - Recognize effective internal control can provide reasonable assurance of achieving effective and efficient operations objectives (as noted before)
 - Clarify requirement that each of the components and relevant principles must be present and functioning and components must operating together
 - Remove presumption that points of focus are present and functioning, and clarify that no separate assessment of points of focus is required
 - Standardize classification of internal control deficiencies, and clarify use of only relevant criteria established in laws, rules, regulations and standards



Updates are responsive to public comments (continued)

- Objective Setting
 - Retain five components of internal control
 - Retain specification of objectives as a principle of effective internal control, but objective setting may be driven by laws, rules, regulations, or external standards that are outside a system of internal control
- Objectives
 - Retain view that safeguarding of assets primarily relates to operations objectives, and recognize its consideration within reporting and compliance
 - Acknowledge some laws rules, regulations and standards establish safeguarding of assets as a separate category of objectives
 - Retain view that strategic objectives is not part of internal control
 - Retain operations, reporting, and compliance objective categories, and expand descriptions



Updates are responsive to public comments (continued)

- Enterprise Risk Management (ERM)
 - Retain distinction between ERM and internal control, and acknowledge these frameworks are complementary
 - Retain view that strategy-setting, strategic objectives, and risk appetite are aspects of ERM, not Internal Control-Integrated Framework
 - Retain discussion of risk appetite and application of risk tolerance
- Smaller Entities and Governments – Provide additional guidance specific to smaller entities and governments (Appendix C)
- Technology
 - Expand discussion in the points of focus and in several chapters
 - Decline suggestion to address risk associated with specific technologies because of the rapid pace of change



Updates are responsive to public comments (continued)

- Structure and Layout – Retain view that all chapters 1-10 comprise the Framework
- Due Process – COSO believes there has been a substantive due process effort to capture views on proposed update
 - Surveyed stakeholders to ascertain preferences concerning nature and extent of needed updates; 700 responses (December 2010 to September 2011)
 - Conducted eleven meetings with COSO Advisory Council
 - Provided exposure drafts of proposed updates for public comments (December 2011 to March 2012, and September to December 2012)
 - Participated in many conferences, webinars, and seminars with membership of COSO to seek views of stakeholders (January 2011 to January 2013)



Illustrative Documents:

- **Illustrative Tools for Assessing Effectiveness of a System of Internal Control**
- **Internal Control over External Financial Reporting: A Compendium of Approaches and Examples**



Illustrative Tools for Assessing Effectiveness of a System of Internal Control

- Assist users when assessing effectiveness of internal control based on the requirements set forth in the Framework
 - Templates illustrate a possible summary of assessment results
 - Scenarios illustrate practical examples of how the templates can be used to support an assessment and important considerations in performing an assessment
- Focus on evaluating components and relevant principles, not the underlying controls that affect relevant principles
- Cannot satisfy criteria established through laws, rules, regulations, or external standards for evaluating the severity of internal control deficiencies
- Can customize level and amount of detail included in the templates as management may deem necessary



Internal Control over External Financial Reporting (ICEFR): A Compendium of Approaches and Examples

- Approaches and Examples illustrate how various characteristics of principles may be present and functioning within a system of internal control relating to external financial reporting
 - Approaches are designed to give a summary-level description of activities that management may consider as they apply the Framework
 - Examples illustrate one or more points of focus of a particular principle. They are not designed to provide a comprehensive, end-to-end example of how a principle may be fully applied in practice.
 - Selected approaches and examples do not illustrate all aspects of components and relevant principles that would be necessary for effective internal control
- Stakeholders should refer to the Framework for the requirements of effective internal control
 - Compendium supplements and can be used in concert



Summary of public exposure of the Illustrative Documents

- Proposed *Internal Control over External Financial Reporting: Compendium of Approaches and Examples* was released for public comment from September 18, 2012 to December 4, 2012
- In conjunction with the public exposure of ICEFR Compendium, COSO made available revised versions of the previously exposed *Framework and Appendices* and *Executive Summary*
- COSO made available the proposed *Illustrative Tools for Assessing Effectiveness of a System of Internal Control*
- COSO sought comments from the general public on relevant topics
- Public comment letters available at www.ic.coso.org until Dec. 31, 2013

Illustrative documents are responsive to public comments

- ICEFR: A Compendium of Approaches and Examples
 - Add or clarify specific examples, including:
 - Establishing responsibilities for reviewing financial statements
 - Monitoring investigation and reporting of whistleblower allegations
 - Monitoring identification and protection of sensitive financial information
 - Monitoring identification and analysis of risk of material misstatement due to fraud
 - Address a risk-based approach for achieving external financial reporting objectives
 - Specify suitable objectives for external financial reporting
 - Risks to achieving suitable objectives
 - Responses to risks



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Transition & Impact



Transition & Impact

- Users are encouraged to transition applications and related documentation to the updated Framework as soon as feasible
- Updated Framework will supersede original Framework at the end of the transition period (i.e., December 15, 2014)
- During the transition period, external reporting should disclose whether the original or updated version of the Framework was used
- Impact of adopting the updated Framework will vary by organization
 - Does your system of internal control need to address changes in business?
 - Does your system of internal control need to be updated to address all principles?
 - Does your organization apply and interpret the original framework in the same manner as COSO?
 - Is your organization considering new opportunities to apply internal control to cover additional objectives?



Transition & Impact (continued)

- The principles-based approach provides flexibility in applying the Framework to multiple, overlapping objectives across the entity
 - Easier to see what is covered and what is missing
 - Focus on principles may reduce likelihood of considering something that's irrelevant
- Understanding the importance of specifying suitable objectives focuses on those risks and controls most important to achieving these objectives.
- Focusing on areas of risk that exceed acceptance levels or need to be managed across the entity may reduce efforts spent mitigating risks in areas of lesser significance.
- Coordinating efforts for identifying and assessing risks across multiple, overlapping objectives may reduce the number of discrete risks assessed and mitigated.



Transition & Impact (continued)

- Selecting, developing, and deploying controls to effect multiple principles may also reduce the number of discrete, layered-on controls.
- Applying an integrated approach to internal control - encompassing operations, reporting, and compliance – may lessen complexity.
- In assessing severity of internal control deficiencies, use only the relevant classification criteria as set out in the Framework or by regulators, standard-setting bodies, and other relevant third parties, as appropriate.



Recommended Actions

- Read COSO's updated Framework and illustrative documents
- Educate the audit committee, C-suite, operating unit and functional management
- Establish a process for identifying, assessing, and implementing necessary changes in controls and related documentation
- Develop and implement a transition plan timely to meet key objectives – e.g., apply updated Framework by December 31, 2014 for external reporting



Getting COSO's Publications

The updated Framework and related Illustrative documents are available in 3 layouts

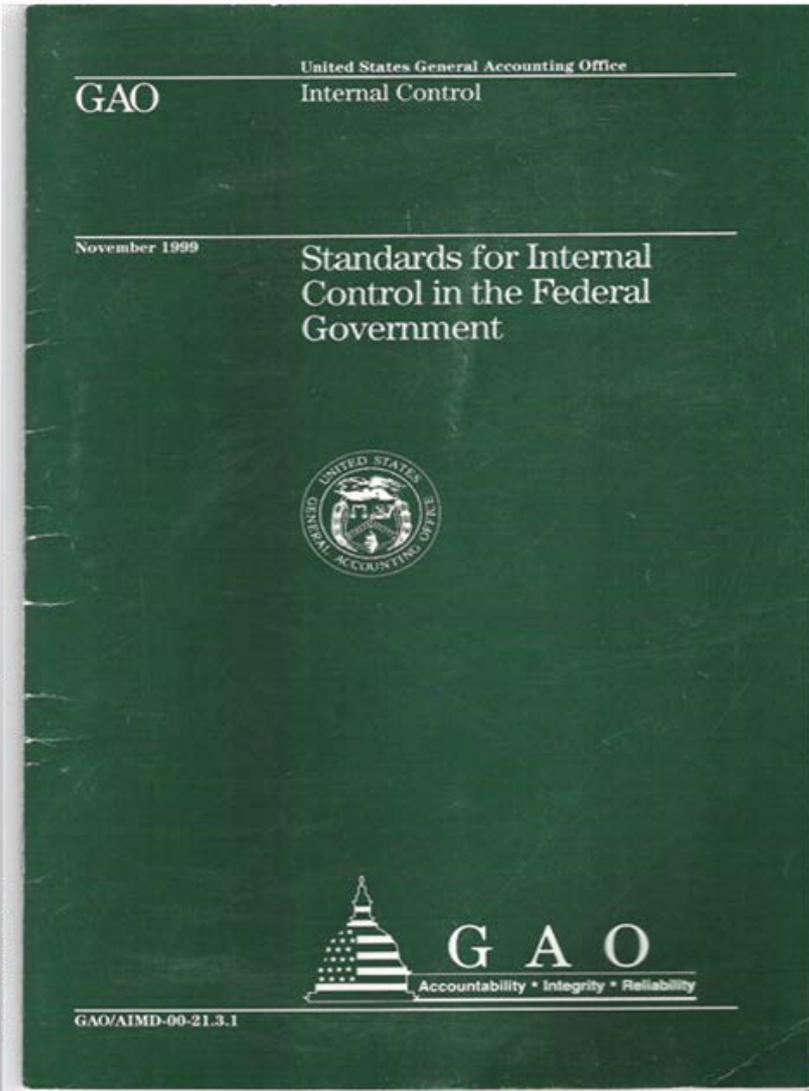
1. E-book – This layout is ideally suited for those wanting access in electronic format for tablet use. An e-book reader from the AICPA is required to view this layout. Printing is restricted in this layout.
 - Purchase through www.cpa2biz.com
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Questions & Comments

STANDARDS FOR INTERNAL CONTROL IN THE GOVERNMENT



GOING

GREEN

WHAT'S IN GREEN BOOK FOR THE FEDERAL GOVERNMENT?

- REFLECTS FEDERAL INTERNAL CONTROL STANDARDS REQUIRED PER FEDERAL MANAGERS' FINANCIAL INTEGRITY ACT (FMFIA)
- SERVES AS A BASE FOR OMB CIRCULAR A-123 (NOT A-133)
- WRITTEN FOR GOVERNMENT
 - LEVERAGES THE COSO FRAMEWORK
 - USES GOVERNMENT TERMS

WHAT'S IN GREEN BOOK FOR STATE AND LOCAL GOVERNMENTS?

- **MAY BE AN ACCEPTABLE FRAMEWORK FOR INTERNAL CONTROL ON THE STATE AND LOCAL GOVERNMENT LEVEL UNDER OMB UNIFORM GUIDANCE FOR FEDERAL AWARDS SECTION 200.303 (SEE LATER)**
- **WRITTEN FOR GOVERNMENT**
 - **LEVERAGES THE COSO FRAMEWORK**
 - **USES GOVERNMENT TERMS**

WHAT'S IN GREEN BOOK FOR MANAGEMENT AND AUDITORS?

- PROVIDES A FRAMEWORK FOR
MANAGEMENT
- PROVIDES CRITERIA FOR AUDITORS
- CAN BE USED IN CONJUNCTION WITH
OTHER STANDARDS, E.G. YELLOW BOOK

FROM COSO TO GREEN BOOK: HARMONIZATION

COSO

Green Book

STANDARDS: COSO VS. GREEN BOOK

Component	COSO	Green Book
Control Environment	5 Principles 20 Points of Focus	5 Principles 14 Attributes
Risk Assessment	4 Principles 27 Points of Focus	4 Principles 10 Attributes
Control Activities	3 Principles 16 Points of Focus	3 Principles 11 Attributes
Information & Communication	3 Principles 14 Points of Focus	3 Principles 7 Attributes
Monitoring	2 Principles 10 Points of Focus	2 Principles 6 Attributes

Overview

Standards

Note: GAO combined COSO's points of focus into attributes

STANDARDS: HARMONIZATION FROM COSO TO GREEN BOOK

Overview

Standards

Commercial Concepts

- Board of Directors
- Investors

Government Concepts

- Oversight Body
- Stakeholders

STANDARDS: HARMONIZATION EXAMPLE

Overview

Standards

COSO (PRINCIPLE 2)

*THE BOARD OF DIRECTORS DEMONSTRATES
INDEPENDENCE FROM MANAGEMENT AND
EXERCISES OVERSIGHT OF THE DEVELOPMENT
AND PERFORMANCE OF INTERNAL CONTROL.*

GREEN BOOK (PRINCIPLE 2)

*THE OVERSIGHT BODY SHOULD OVERSEE THE
ENTITY'S INTERNAL CONTROL SYSTEM.*

OTHER KEY DIFFERENCES

- CRITERIA VS. FRAMEWORK
- DOCUMENTATION REQUIREMENTS
 - O4.08 LISTS THE FIVE DOCUMENTATION REQUIREMENTS FOUND IN THE GREEN BOOK WHICH REPRESENT THE MINIMUM LEVEL OF DOCUMENTATION NECESSARY FOR AN EFFECTIVE INTERNAL CONTROL SYSTEM.
- EVALUATION INCLUDES THE ATTRIBUTE LEVEL
 - O3.09 DISCUSSES HOW MANAGEMENT CONSIDERS THE DESIGN, IMPLEMENTATION, AND OPERATING EFFECTIVENESS OF THE ATTRIBUTES FOR EACH PRINCIPLE

DOCUMENTATION REQUIREMENTS

- CONTROL ENVIRONMENT
 - 3.1 2: MANAGEMENT SHOULD DEVELOP AND MAINTAIN DOCUMENTATION OF ITS INTERNAL CONTROL SYSTEM.
- CONTROL ACTIVITIES
 - 1 2.03: MANAGEMENT SHOULD DOCUMENT IN POLICIES THE INTERNAL CONTROL RESPONSIBILITIES OF THE ORGANIZATION.

DOCUMENTATION REQUIREMENTS (CONT.)

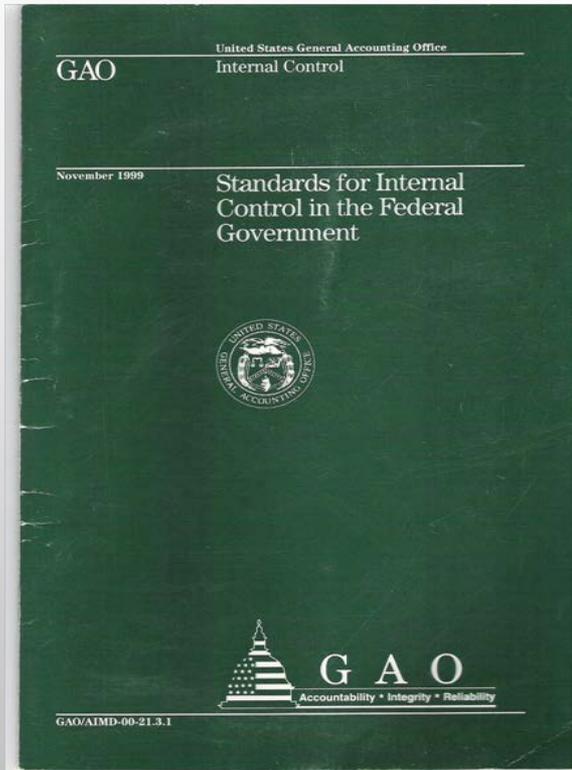
- MONITORING

- 16.12: MANAGEMENT SHOULD EVALUATE AND DOCUMENT THE RESULTS OF ONGOING MONITORING AND SEPARATE EVALUATIONS TO IDENTIFY INTERNAL CONTROL ISSUES.
- 17.07: MANAGEMENT SHOULD EVALUATE AND DOCUMENT INTERNAL CONTROL ISSUES AND DETERMINE APPROPRIATE CORRECTIVE ACTIONS FOR INTERNAL CONTROL DEFICIENCIES ON A TIMELY BASIS.
- 17.09: MANAGEMENT SHOULD COMPLETE AND DOCUMENT CORRECTIVE ACTIONS TO REMEDIATE INTERNAL CONTROL DEFICIENCIES ON A TIMELY BASIS.

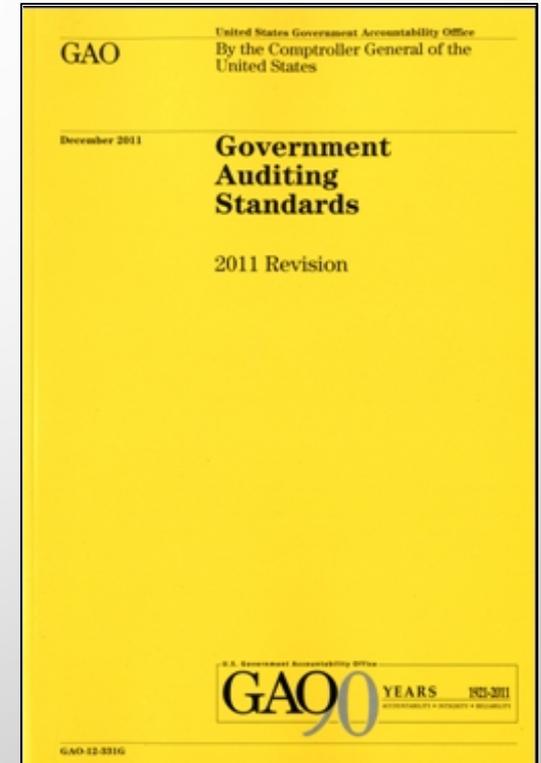
THE GREEN BOOK IN ACTION

- RELATIONSHIP BETWEEN THE GREEN BOOK AND YELLOW BOOK
- AN INTERNAL CONTROL CASE STUDY ILLUSTRATING HOW THE GREEN BOOK COULD HELP MANAGERS AND AUDITORS ADDRESS IDENTIFIED ISSUES

GREEN BOOK AND YELLOW BOOK



- CAN BE USED BY MANAGEMENT TO UNDERSTAND REQUIREMENTS
- CAN BE USED BY AUDITORS TO UNDERSTAND CRITERIA

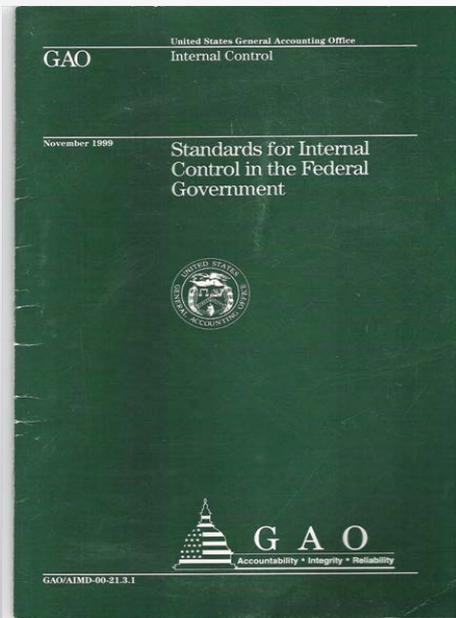


THE YELLOW BOOK: FRAMEWORK FOR AUDITS

- FINDINGS ARE COMPOSED OF
 - CONDITION (WHAT IS)
 - **CRITERIA (WHAT SHOULD BE)**
 - CAUSE
 - EFFECT (RESULT)
 - RECOMMENDATION (AS APPLICABLE)



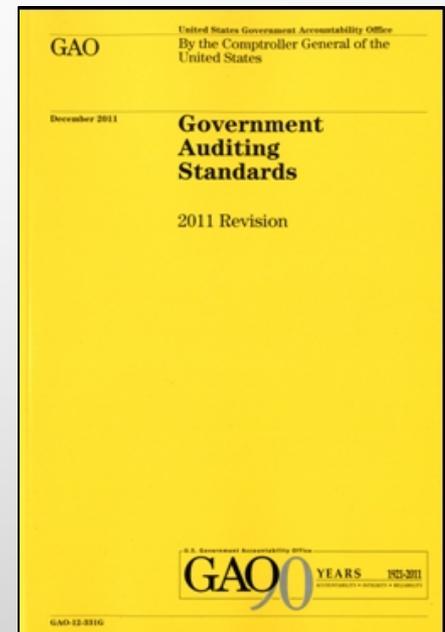
LINKAGE BETWEEN CRITERIA (YELLOW BOOK) AND INTERNAL CONTROL (GREEN BOOK)



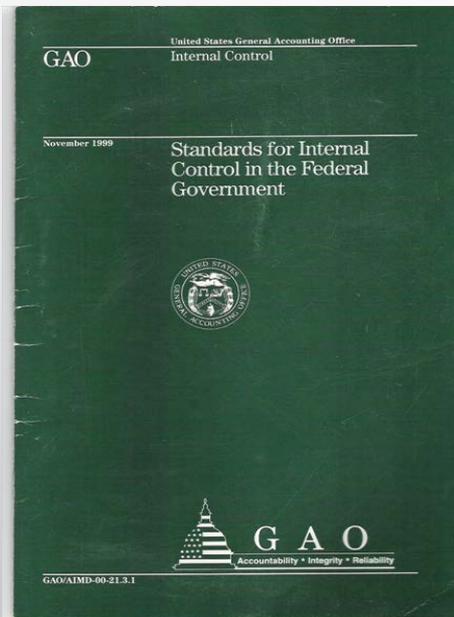
- GREEN BOOK PROVIDES CRITERIA FOR THE DESIGN, IMPLEMENTATION, AND OPERATING EFFECTIVENESS OF AN EFFECTIVE INTERNAL CONTROL SYSTEM

THE YELLOW BOOK: FRAMEWORK FOR AUDITS

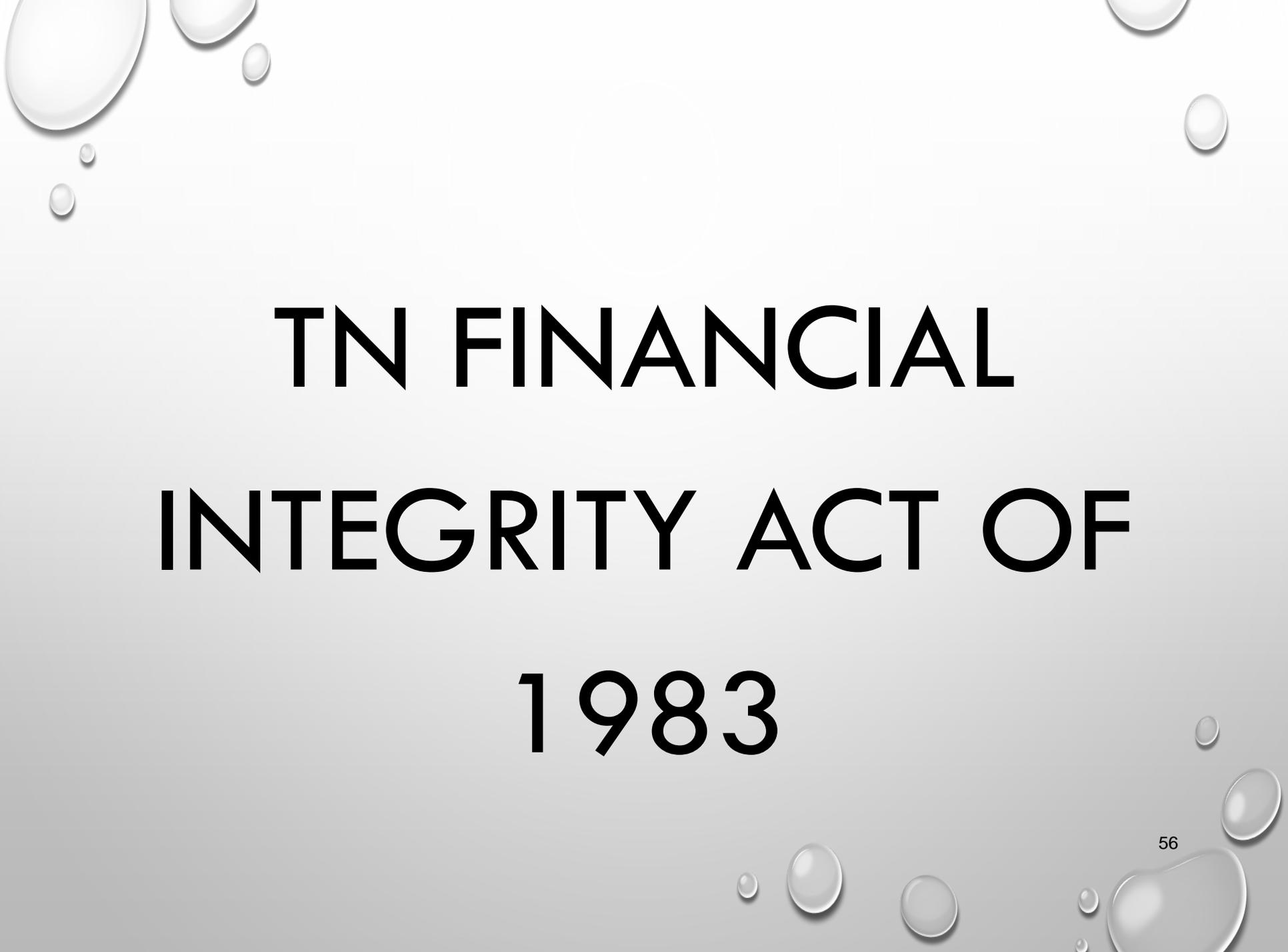
- FINDINGS ARE COMPOSED OF
 - CONDITION (WHAT IS)
 - CRITERIA (WHAT SHOULD BE)
 - **CAUSE**
 - EFFECT (RESULT)
 - RECOMMENDATION (AS APPLICABLE)



LINKAGE BETWEEN FINDINGS (YELLOW BOOK) AND INTERNAL CONTROL (GREEN BOOK)



- FINDINGS MAY HAVE CAUSES THAT RELATE TO INTERNAL CONTROL DEFICIENCIES



**TN FINANCIAL
INTEGRITY ACT OF
1983**

FIA

9-18-102. INTERNAL CONTROLS -- MANAGEMENT ASSESSMENT OF RISK.

(A) EACH AGENCY OF STATE GOVERNMENT AND INSTITUTION OF HIGHER EDUCATION SHALL ESTABLISH AND MAINTAIN INTERNAL CONTROLS, WHICH SHALL PROVIDE REASONABLE ASSURANCE THAT:

- (1)** OBLIGATIONS AND COSTS ARE IN COMPLIANCE WITH APPLICABLE LAW;
- (2)** FUNDS, PROPERTY AND OTHER ASSETS ARE SAFEGUARDED AGAINST WASTE, LOSS, UNAUTHORIZED USE OR MISAPPROPRIATION; AND
- (3)** REVENUES AND EXPENDITURES APPLICABLE TO AGENCY OPERATIONS ARE PROPERLY RECORDED AND ACCOUNTED FOR TO PERMIT THE PREPARATION OF ACCURATE AND RELIABLE FINANCIAL AND STATISTICAL REPORTS AND TO MAINTAIN ACCOUNTABILITY OVER THE ASSETS.

FIA

9-18-102. INTERNAL CONTROLS -- MANAGEMENT ASSESSMENT OF RISK. (CONT.)

(B) TO DOCUMENT COMPLIANCE WITH THE REQUIREMENTS SET FORTH IN SUBSECTION (A), EACH AGENCY OF STATE GOVERNMENT AND INSTITUTION OF HIGHER EDUCATION SHALL ANNUALLY PERFORM A MANAGEMENT ASSESSMENT OF RISK. THE INTERNAL CONTROLS DISCUSSED IN SUBSECTION (A) SHOULD BE INCORPORATED INTO THIS ASSESSMENT.

FIA

9-18-102. INTERNAL CONTROLS -- MANAGEMENT ASSESSMENT OF RISK. (CONT.)

THE OBJECTIVES OF THE ANNUAL RISK ASSESSMENT ARE TO PROVIDE REASONABLE ASSURANCE OF THE FOLLOWING:

- (1) ACCOUNTABILITY FOR MEETING PROGRAM OBJECTIVES;**
- (2) PROMOTING OPERATIONAL EFFICIENCY AND EFFECTIVENESS;**
- (3) IMPROVING RELIABILITY OF FINANCIAL STATEMENTS;**
- (4) STRENGTHENING COMPLIANCE WITH LAWS, REGULATIONS, RULES, AND CONTRACTS AND GRANT AGREEMENTS; AND**
- (5) REDUCING THE RISK OF FINANCIAL OR OTHER ASSET LOSSES DUE TO FRAUD, WASTE AND ABUSE.**

FIA

- **9-18-103. GUIDELINES FOR ASSESSMENT OF COMPLIANCE.**

THE COMMISSIONER OF FINANCE AND ADMINISTRATION, IN CONSULTATION WITH THE COMPTROLLER OF THE TREASURY, SHALL ESTABLISH GUIDELINES FOR THE ASSESSMENT, BY MANAGEMENT OF STATE AGENCIES AND HIGHER EDUCATION INSTITUTIONS, OF THE RISKS AND SYSTEMS OF INTERNAL CONTROL TO DETERMINE COMPLIANCE WITH THE REQUIREMENTS OF § 9-18-102. THE COMMISSIONER, IN CONSULTATION WITH THE COMPTROLLER OF THE TREASURY, MAY MODIFY THE GUIDELINES FROM TIME TO TIME AS DEEMED NECESSARY.

FIA

- **9-18-104. REPORT BY HEAD OF EXECUTIVE AGENCY.**

(A) BY DECEMBER 31, 2008, INITIALLY, AND THEN BY DECEMBER 31 OF EVERY YEAR THEREAFTER, THE HEAD OF EACH STATE AGENCY AND HIGHER EDUCATION INSTITUTION SHALL, ON THE BASIS OF THE EVALUATIONS CONDUCTED IN ACCORDANCE WITH GUIDELINES PRESCRIBED UNDER § 9-18-103, PREPARE AND TRANSMIT TO THE COMMISSIONER OF FINANCE AND ADMINISTRATION AND THE COMPTROLLER OF THE TREASURY A REPORT THAT STATES THAT:

(1) THE AGENCY OR INSTITUTION ACKNOWLEDGES ITS MANAGEMENT'S RESPONSIBILITY FOR ESTABLISHING, IMPLEMENTING AND MAINTAINING AN ADEQUATE SYSTEM OF INTERNAL CONTROL; AND

(2) A MANAGEMENT ASSESSMENT OF RISK PERFORMED BY THE AGENCY OR INSTITUTION PROVIDES OR DOES NOT PROVIDE REASONABLE ASSURANCE OF COMPLIANCE WITH THE OBJECTIVES OF THE ASSESSMENT AS SPECIFIED IN THIS CHAPTER.

FIA

- **9-18-104. REPORT BY HEAD OF EXECUTIVE AGENCY. (CONT.)**

(B) IN THE EVENT THAT THE AGENCY'S OR INSTITUTION'S ASSESSMENT DOES NOT PROVIDE REASONABLE ASSURANCE OF COMPLIANCE WITH THE OBJECTIVES OF THE ASSESSMENT AS STATED IN THIS CHAPTER, THE REPORT SHALL INCLUDE A CORRECTIVE ACTION PLAN THAT IDENTIFIES:

(1) ANY SIGNIFICANT DEFICIENCIES OR MATERIAL WEAKNESSES IN THE AGENCY'S OR INSTITUTION'S SYSTEM OF INTERNAL CONTROL AND/OR LACK OF RISK MITIGATING CONTROL ACTIVITY; AND

(2) THE PLANS AND THE SCHEDULE FOR CORRECTING THE WEAKNESSES.

QUESTIONS?



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TN DIVISION OF STATE AUDIT
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