How an Auditor Looks at Internal Control

NASCSP State CSBG Monitors Training

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Session Focus:

• Role & goal of independent audits
• Why auditors consider internal controls
• COSO framework
• System problems/implementation errors
• Testing controls & compliance
• Reports & findings
Quick Quiz?

1. What’s the purpose of an independent audit of financial statements?

2. How is an A-133 audit different from a “standard” audit of financial statements?

3. Who can conduct independent audits and/or A-133 audits?
Independent Audits

• Board engages CPA to conduct independent audit

• Management responsible for preparing accurate financial statements

• Auditor responsible for opinion on extent to which readers can rely on the statements
Purpose of Independent Audit

Get auditor’s opinion about whether the entity’s financial statements fairly present the financial position and results of activities in accord with standards of US GAAP.
Essential Requirements for Auditors

• Independence
• Professional competence
• Sufficient study & testing to form basis for opinion
• Work & communication in accord with Generally Accepted Auditing Standards
GAAS

• Generally Accepted Audit Standards
• Developed by AICPA
• Published in Statements on Auditing Standards (SAS)
• Significant changes since 2006
New Auditing Standards

• Require more rigorous analysis of risks of misstatement and design of audit procedures to test for significant risks
• Require disclosure to the board of material weaknesses and significant deficiencies
All Audits Require Auditor to:

- Understand the nature of the “business”
- Assess risks of misstatement & noncompliance
- Understand controls to address risks
- Test controls
- Analyze results of test
- Determine significance of problems
Yellow Book Audits

• Government Auditing Standards
  http://www.gao.gov/govaud/ybk01.htm

• Guides audits of individual federal awards when A-133 not required

• Contains core requirements used for A-133 audits
A-133 Audits

• Required when combined federal expenditures of $500,000 or more within the organization’s fiscal year
• Described in Office of Management & Budget Circular A-133
• Include all standard independent audit procedures and reports
• Require additional testing and reporting on compliance with federal funds requirements
A-133 Audits- continued

• Include auditor’s opinion on compliance with requirements of major federal programs
• Include findings on compliance and questioned costs
Key A-133 Resources

• A-133 Compliance Supplement

• A-133 Compliance Supplement Addendum June 30, 2009 - ARRA

• A-133 2010 Compliance Supplement August, 2010  including new guidance on job creation
Why Do Auditors Consider Internal Controls?
SAS 112 Requires Auditor to

• Assess organization’s risks
• Understand controls
• Determine whether controls would be adequate if fully utilized
• Test whether the controls are working
Internal Controls

• **Systems**, policies & policies designed to prevent and detect errors and irregularities

• **Control environment**: organization-wide expectations around integrity & compliance
Internal Controls designed to:

• Reduce the risk of improper actions
• Increase the likelihood that errors or wrong acts will be detected
• Reduce the risk that error will go uncorrected
Controls Designed to Prevent

• **Misstatement:**
  – Financial statements do not fairly present financial condition

• **Misappropriation:**
  – Theft or misuse of the organization’s assets

• **Non-Compliance:**
Reality

• No perfect controls
• Controls provide reasonable assurance, not absolute assurance
• Cost/benefit analysis essential in designing, implementing, & monitoring controls
Additional Requirements for A-133 Audits

Auditor must:

- Identify major federal programs
- Understand compliance requirements for major federal programs
- Identify risks of non-compliance
- Test controls to determine compliance
A-133 Requires Auditor to:

• Determine whether organization is a high risk auditee
• Determine whether the organization has received awards through federal programs that are deemed high risk
• Tailor audit procedures & tests to address the level of risk
A-133 Requires Auditor to obtain “low” control risk

• “Low” control risk requires:
  – Reliable controls
  – Controls operate effectively

• Auditor gets to “low” control risk by:
  – Documenting understanding of controls
  – Testing control design and implementation
  – Testing control effectiveness
A-133 Auditors Under Pressure

2007 GAO study of A-133 audits found:

- 48.6% of audits, which covered 92% of $$ audited, were deemed “acceptable”
- 16% deemed of “limited reliability”
- 35.5% of audits (covering only 4.8% of dollars) were deemed “unacceptable”
Internal Control Standards

• A-133 and standard audits rely on COSO
• COSO – Committee of Sponsoring Organizations created framework for establishing and evaluating internal controls
• www.coso.org/IC
COSO Framework

1. Control environment
2. Risk assessment
3. Control activities
4. Information & effective communication
5. Monitoring
Apply COSO Framework to:

- Operations
- Financial Reporting
- Compliance
Core Control Concepts

• Internal control is not one event, but a series of actions and activities that occur throughout an entity’s operation on an ongoing basis.

• Integral part of each system used to regulate & guide operations.
Comprehensive Controls

• Highest levels of management & governance
• Compliance with law/regulation
• Program activities
• Operational policies & procedures
• Internal & external reporting
COSO Framework

1. Control environment
2. Risk assessment
3. Control activities
4. Information & effective communication
5. Monitoring
COSO: Control Environment

Board oversight of controls

- Annual audit
- Audit committee/auditor communication
- CEO annual review
- Follow-up on audit/monitoring findings
- Review of monthly financial statements
- Awareness of most significant risks
COSO: Control Environment:

CEO & Management

• CEO/Management awareness of high risk areas
• Adequacy of resources for fiscal and program management
• Monthly analysis of financial statements
• Authority/responsibility for compliance clearly assigned
COSO: Risk Assessment

Risk Factors:

• Materiality of exposure – $$ at risk
• Complexity of compliance requirements
• Experience/lack of experience with program
• Weak control environment/lack of management expertise
COSO: Risk Assessment

More Risk Factors

- Financial pressure
- Failure to address previous findings
- Change in CFO
COSO: Control Activities

Control Activity Basics:

• Top level review of accomplishments
• Comparison of actual to planned, both $$$ & activities
• HR management to employ competent, high integrity staff
• Info processing controls
COSO: Control Activities

More Control Basics

- Physical control of assets
- Segregation of duties
- Proper execution of transactions
- Accurate/timely recording
- Access restrictions & accountability
- Documentation of transactions & controls
COSO Framework

1. Control environment
2. Risk assessment
3. Control activities
4. Information & effective communication
5. Monitoring
COSO: Info & Communications

Key Elements

• Relevant, reliable, & timely access to programmatic & financial info for managers??

• Clarity regarding responsibility for monitoring info & authority to require change ??
COSO: Monitoring

Monitoring ???

• Is responsibility for periodic testing of compliance clearly assigned & adequate time available for timely testing?

• Responsibility for follow-up on prior findings clearly assigned with realistic timeline for resolution?
Auditor Analysis of Internal Controls

- Adequacy of design of control systems:
  - Control environment
  - Policies and procedures
  - Control activities
  - Info and communication
  - Internal monitoring
More Auditor Analysis

• Are controls working as designed?
• How likely is it that the controls have failed
  – To deter and or detect error or improper action
  – To result in correction of error
• How significant would the consequences be if the controls failed?
Key Changes Since 2006

- Auditors required to do more rigorous analysis of risks of misstatement and design audit procedures to test for significant risks
- Must test of controls even when controls are deemed inadequate
Test Controls through Sampling

• Auditors use sampling to test internal controls & compliance

• Do not test every transaction

• Design sample to test significant transactions & test a statistically large enough # of total transactions to predict the reliability of the controls
Sampling - continued

• **Expand sample** when initial tests reveal unacceptable rate of error

• Auditor evaluates potential significance of errors or noncompliance with controls to determine whether controls are effective
Auditor Conclusions

- Consider **adequacy of control design**
- Analyze results of testing to determine **effectiveness of controls**
- Determine the **significance** of control problems
- Communicate control conclusions
SAS No. 115
Communicating Internal Control-Related Matters
Identified in an Audit

• Requires written communication of material weaknesses and significant deficiencies in controls

• Must continue to report weaknesses/deficiencies until they are corrected
Which sounds worse to you?

- Material Weakness
- Significant Deficiency
Significant Deficiencies

• Replaces term “reportable condition”
• Exists when design or operation of a control does not allow management/staff to prevent or detect misstatements on a timely basis
Significant Control Deficiencies

• Inability to prepare F/S
• Inadequate segregation of duties
• No Safeguarding of assets
• Receives significant accounting services
• Lack of timely reconciliations
• Lack of expertise in accounting principles
• Employee fraud
• Qualification & training of staff
• No monitoring of controls
Material Weaknesses

• A material weakness is a significant deficiency, or combination of significant deficiencies, that results in more than a remote likelihood that a material misstatement of the financial statements will not be prevented or detected.
Material Weaknesses

- Significant audit adjustments
- Not correcting internal control deficiencies
- Fraud by management
- Regulatory non-compliance
- Bias in accounting estimates
- Restatement of financial statements
- Deficiencies in IT controls
- Ineffective oversight of financial reporting
Recent Trends

• Increased reporting of significant deficiencies or material weaknesses in internal control

• Increased auditor concern about independence – reluctance to perform audits for clients lacking sufficient expertise to form independent judgments about proposed adjustments
A-133 Compliance Report

A-133 Auditor must issue:

Report on **Compliance** with Requirements that Could Have a Direct and Material on each Major Program and on Internal Control Over Compliance in Accord with OMB Circular A-133
A -133 Compliance Testing

• If internal controls are found to be effective, auditor uses similar sized samples sizes to test compliance

• If controls are found to be not effective, sample sizes need to be significantly increased to determine compliance
Key Federal Funds Compliance Issues

• Identification of compliance requirements
• Personal activity reporting to substantiate personnel related charges
• Sub-recipient monitoring
• Procurement
• Cash Management
Key Federal Compliance Controls - continued

• Allowable costs – including allocated costs
• Facilities & equipment controls
Common A-133 Compliance Issues

- Time and Effort / Personal Activity Reporting
- Davis-Bacon Act Compliance
- Inadequate sub-recipient monitoring
- Lack of compliance policies & procedures
- Financial statement audit adjustments
A-133 Compliance Findings

- CFDA number and title
- Federal award number and year
- Federal agency
- Name of pass-through entity
- Criteria – statutory / regulatory
- Condition found
- Questioned cost – how computed
- Information to provide prospective
- Cause / effect
- Recommendation
Your Use of Auditor Reports?

- Focus monitoring efforts
- Identify common issues/challenges among CAAs in your state
- Support training & technical assistance to address common issues
- Track CAA follow-through on addressing findings
Quiz Answers

1. Boards hire independent auditors to obtain their professional opinion about whether the financial statements fairly present the financial condition of the organization.

2. The A-133 audit results in a professional opinion about the organization’s compliance with Federal funding requirements in addition to an opinion about whether the financial statements fairly present the financial condition.

3. States control licensure of CPAs, including establishing specific requirements for governmental auditing.