

2015 Combined IPA Conference

August 21, 2015

Hilton Columbus at Easton 3900 Chagrin Drive Columbus, Ohio 43219





2015 Combined IPA Conference Agenda

Friday, August 21, 2015

7:30 - 8:00 a.m.	Registration
8:00 - 8:10 a.m.	Conference Welcome
8:10 - 9:00 a.m.	SSARS-21: Friend or Foe?
	Robin Ring, Robin L Ring and Associates
	Course Description:
	SSARS 21, which revises the standards for reviews, compilations and engagements to prepare financial
	statements, is effective for engagements performed for periods ending on or after December 15, 2015.
	You will learn:
	What changed, examine how the changes will affect your peer review, and explore the potentail long-term impact of these changes on the nature of practice in the future.
	Level: Intermediate
	Field of Study: Accounting
9:00 - 10:15 a.m.	Assuring Completeness of the Federal Schedule: Emphasis on ODOT
	Kelly Berger-Davis, Ohio Auditor of State's Office
	Course Description:
	Testing completeness of the Federal Schedule is a very important audit step. This presentation will cover
	the 'what', 'when', 'why', and 'how' of this audit procedure. In addition, several difficulties are often
	encountered by entities & auditors with regards to reporting ODOT grants on the SEFA. This presentation
	will also take a deeper dive into reporting the ODOT grants.
	You will learn:
	 How to properly test completeness of the SEFA A better understanding of when ODOT grants should be reported on an entities SEFA
	Level: Intermediate
	Field of Study: Auditing
10:15 - 10:25 a.m.	Break
10:25 - 11:40 a.m.	Government Fraud: Trends, Risks and Case Studies
10.20 11.40 d.m.	Lee Wagner, Elliott Davis Decosimo
	Course Description:
	This session will discuss fraud in the context of state and local governments and consider the role of the
	external auditor in assisting in the prevention and detection of fraud. In addition, real-life case studies of
	governmental fraud will be presented and analyzed. Virtually every organization in the world, including
	state and local governments, is vulnerable to fraud, and as auditors we have certain responsibilities
	regarding our consideration of fraud during a financial statement audit.
	You will learn:
	Observe fraud statistics and trends from the ACFE's "Report to the Nations"
	 Identify fraud risks specific to governments and learn how to appropriately address those risks Learn from case studies of actual occurrences of fraud in government
	Level: Intermediate
	Field of Study: Fraud/Auditing/Forensic Accounting
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11:40 - 12:40 p.m.	Lunch
12:40 - 1:40 p.m.	GASB 68
	Tracie McCreary, Ohio Auditor of State's Office
	Course Description:
	This session will review the theory behind the net pension liability, identify the steps to generate the
	appropriate documentation, and highlight the corresponding journal entries.
	Level: Advanced
	Field of Study: Accounting
	W-L 044D
1:40 - 2:10 p.m.	WebGAAP
	Tim Downing, Ohio Auditor of State's Office
	Course Description:
	Provides an overview of the Web GAAP system and available reports.
	You will learn:
	What reports are available on the web gaap system
	 How to access the web gaap system and navigate within the system
	Level: Beginnger
	Field of Study: N/A
2:10 - 2:20 p.m.	Break
2:20 - 2:50 p.m.	Update to IPA Contracting with the Auditor of State
2.20 - 2.30 p.m.	Leanna Abele & Ami Mayne, Ohio Auditor of State's Office
	Course Description:
	An overview of the current and upcoming modifications to the IPA contracting process with the Auditor of
	State (AOS) as a result of the Ohio Society of CPAs/AOS Independent Public Accountant (IPA) Contracting
	Process Task Force.
	You will learn: • A summary of the changes to the IRA Contracting Process that have been implemented in the last year
	 A summary of the changes to the IPA Contracting Process that have been implemented in the last year. A summary of the upcoming changes to the IPA Contracting Process - including increased functionality of
	the IPA Portal, automated billing approval, changes to lessen the cumbersome contracting process, and
	centralization of the process.
	Level: Beginner
	Field of Study: N/A
2:50 - 3:40 p.m.	Understanding General IT Controls
	Chris McGee & Angela Leggett, KPMG
	Course Description:
	This session would help the audience to understand the role IT General Controls play in the auditing of
	critical business processes and financial data. At the conclusion the user would understand the various
	areas of IT General Controls, typical deficiencies and how those deficiencies impact the overall audit.
	You will learn:
	What role do modern IT and ERP systems play in the financial reporting process?
	 What controls are expected to exist over those systems?
	What is the impact on the business process and related audit assertions when issues are found?
	Level: Beginner
	Field of Study: IT Audit
3:40 p.m.	Adjourn

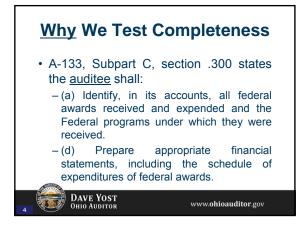
SSARS-21: Friend or Foe?

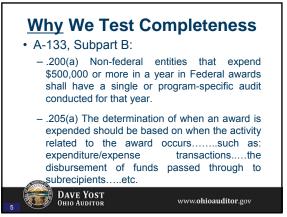
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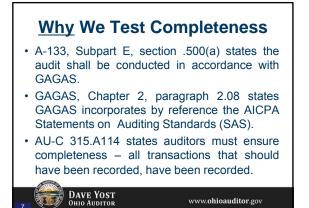
Why We Test Completeness

On-Behalf-Of Expenditures

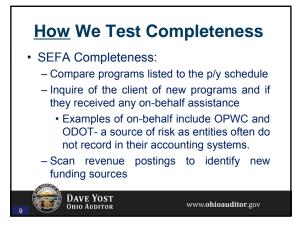
- Sometimes a local government enters into an agreement with another local government, the State, or the federal government to have a program administered "on their behalf", where the benefitting government may not receive cash or make disbursements
- The expenditures made by the administering government (ie. the State), on-behalf-of the benefitting government (ie. the local government) should be booked to the benefitting governments ledgers.

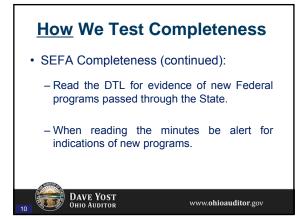
See AOS Bulletin 2000-008 for further guidance.

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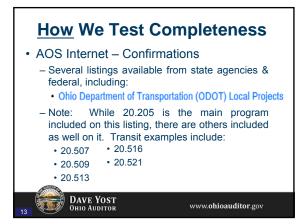














- ODOT has clarified to us that their listing is not a "confirmation" (reasons discussed on later slides).
- ODOT added the following notes to the listing to make auditors aware:

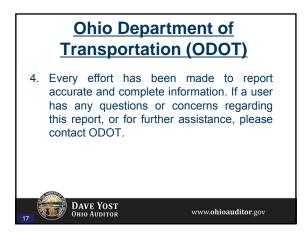
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- 1. Listing of Projects that included Federal Disbursements made by the Ohio Department of Transportation (ODOT) to and on behalf of Sponsoring Agencies with administrative responsibilities as defined by OMB Circular A-133.
- 2. It is also necessary to use the LPA Federal Statewide Projects listing.
- No MPO Planning Expenditures are included in 3. the reports. DAVE YOST Ohio Auditor

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Ohio Department of Transportation (ODOT)

- 5. 20.205 Project Funding Auditors should inquire of the client regarding all expenditures made, as ODOT can only report expenditures it has paid and/or reimbursed.
- 6. Auditors should trace funding received and expended to ledgers.
- 7. ODOT has provided the project information to help audits ensure completeness of the Federal Schedule; however the ODOT report and CMS data should not be the primary source of Federal Expenditure reporting for the Locals.

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• Due to the ongoing goal for each local agency to provide accurate expenditure data based upon its own payment date, rather than an ODOT reimbursement date, beginning with Fy 2013 audits, ODOT no longer provides a detailed entity expenditure listing.

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Ohio Department of Transportation (ODOT)

- · ODOT instead provides an entity project listing (PID listing).
 - ODOT provides a listing of projects that had Federal expenditures made by the Ohio Department of Transportation (ODOT) during the applicable calendar year.
 - This listing includes projects for which Federal expenditures were made to and on behalf of Sponsoring Agencies with administrative responsibilities as defined by OMB Circular A-133.



- ODOT instead provides an entity project listing (cont'd)
 - The Fy 2014 report included projects for which Federal expenditures were made for the period January 1, 2014 - December 31, 2014.
 - Since ODOT has a few statewide projects which include one PID to many entities, detailed entity expenditure information will be provided for these projects.

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Ohio Department of Transportation (ODOT) • Issues with past ODOT reports: – Many entities simply reported the ODOT expenditure amounts on their SEFA, although the entity ledgers had expended amounts different than what ODOT reported.

- Some entities are reimbursed by ODOT in a different calendar year (reporting period) than when the entity made the expenditure.
- Some local governments have not been reporting their expenditures on their SEFA until they have received their reimbursement from ODOT, causing reporting errors that can affect multiple year's Schedules of Expenditures of Eederal Awards.

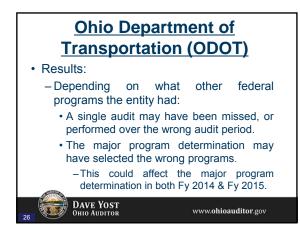
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· Example:

- . The Fy 2014 ODOT Federal Expenditure report (PID listing & CMS portal) identified \$100,000 in Federal Funding provided to ABC County.
- ABC County used the Fy 2014 ODOT report and included \$100,000 on its Federal Schedule for 20.205.
- However, ABC County actually expended an additional \$800,000 on a 20.205 Federal project in December 2014, and requested reimbursement from ODOT. ODOT reimbursed the entity on Jan 15, 2015.
- What should have been the amount reported on their SEFA in Fy 2014 for 20.205?

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Ohio Department of Transportation (ODOT) • Also keep in mind:

- It is not unusual for a local entity to submit 1 large reimbursement request <u>at the end</u> of a <u>multi-year</u>
- project. – There is no requirement prohibiting this practice.
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- · XYZ County used the ODOT report for their SEFA, and therefore did not report any expenditures on its Federal Schedule for 20.205 for those 3 years.
 - They include all on the 4th years SEFA (the year ODOT shows it on their report)

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· How many years SEFA's were misstated?

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Ohio Department of Transportation (ODOT) · Each entity should report their expenditures made during their fiscal year on their SEFA.....from their ledgers!!!!! - Not just pulling a \$ amount off ODOT's listing! - This is the entities SEFA, and it should report their activity! DAVE YOST Ohio Auditor

Ohio Department of Transportation (ODOT)

- · How will the entities know the correct amounts to report?
 - Entities sign grant agreements for these funds.
 - The source of funds is included in each agreement, and in payment documentation.
 - Remember, the local entity initiates the request for funds to ODOT by submitting the payment request, which details the proportionate share of local, state, and federal funding.
 - On-behalf-of payments in addition to the grant agreement, documentation is sent to the entity for each payment made by ODOT on their behalf.
 - · Issue is whether the engineer, etc. submits the documentation to the fiscal officer to enter to their ledgers.

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 Each local agency can still use the ODOT CMS Portal to view its project data for their fiscal year, but should report Federal Expenditure data based upon its own records (expenditure dates), rather than those of ODOT to avoid reporting errors and schedule restatements.

http://www.odotonline.org/cmsportal/

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- To <u>assist</u> <u>auditors</u> in determining completeness of the amount the client reports, ODOT provides 2 reports beginning in Fy 2013:
 - Listing of entity PIDs (Project ID Numbers)
 - Listing of payment detail for Statewide Projects
- These reports are just a starting point for auditors to determine completeness.

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Listing of PID's

- This listing provides PIDs that are related to only 1 entity.
- Auditors can take the PIDs and look up the related expenditures (including on-behalf-of expenditures) on ODOT's website.
- Please be aware of timing differences for reimbursement payments. <u>The local entity should report</u> these expenditures on their SEFA based upon the date they expend the funds, rather than the date ODOT expended the funds.

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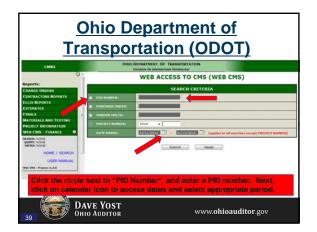












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ALLEN COUNTY ALLEN COUNTY	92742 KOHLI & KALIHER ASSOC INC 93895 KOHLI & KALIHER ASSOC INC	STW 2013 CEAO Load Ratings #4	13 Non-Let	2/11/2013 6/11/2013	V36976 V54748	16,584.80 15.357.60	
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RELEN COUNTY TOTAL	92742 IONES STUCKEY ITD INC	STW 2013 CEAO Load Ratines #4	13 Non-Let	3/8/2013	V40975	31,942.40	20.201
BELMONT COUNTY Total	32742 JUNESSTUCKET LID INC	STW 2013 CEAO LOAD RAUTIO #4	15 Non-Det	3/6/2013	¥40975	3,394.60	20.20
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BUTLER COUNTY Total	Sarve Sharree consocning services	5111 2013 CENO LOLD INDINGTHY	23 Holl-bet	1/11/1013	130575	42,960.00	10.10
ARROLL COUNTY	90189 HAMMONTREE & ASSOCIATES	STW 2011 CEAO Load Ratings #3	13 Non-Let	4/5/2013	V44773	6 907 20	20.20
CARROLL COUNTY Total				4 4 4 4 4 4 4 4		6.907.20	
CHAMPAIGN COUNTY	90189 CHAMPAIGN COUNTY	STW 2011 CEAO Load Ratings #3	13 Non-Let	6/3/2013	V53098	7,846.40	20.20
CHAMPAIGN COUNTY Tot	al					7.846.40	
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Ohio Department of Transportation (ODOT)

- · Has AOS ISA tested ODOT's CMS Portal?
 - ISA performed limited control testing as part of the State of Ohio's audit.
 - While no issues were noted last audit, it was just limited testing, so again, the CMS Portal is just a starting point for auditors testing not a confirmation.

Ohio Department of Transportation (ODOT)

· Do all ODOT federal expenditures get reported on the SEFA?

– No.

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- State administered projects do not get reported on the SEFA.
- Section V of the 20.205 FACCR includes guidance.

- ODOT has reported only projects identified as local-administered (not state administered) on the PID listing.
- If a local entity disagrees with any project, please contact ODOT, for investigation and a final determination.

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Ohio Department of Transportation (ODOT) • ODOT contact for CMS reporting related questions: • Stephanie Wagenschein • 614-387-0390 Stephanie.Wagenschein@dot.state.oh.us • Or e-mail DOT.LPAQuestions@dot.state.oh.us • Although the CMS portal will provide other contacts, please do not use these contacts as they will not be familiar with the Federal reporting requirements. These contacts are primarily for the physical project/engineering, IT access, and vendor payments.

- Additional Guidance Added to Fy 2014 ODOT FACCR:
 - If clients present their SEFA with ODOT programs split out by PID #, auditors should <u>not</u> roll them up by CFDA # and include all PID's in 1 line.
 - If clients present their SEFA with ODOT programs rolling all PID's into 1 line, auditors should <u>not</u> split them out.
 - It is the entities SEFA, and unless ODOT adds a requirement either way to the grant agreement, we should not change with no basis.

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Ohio Department of <u>Transportation (ODOT)</u> • Additional Guidance Added to Fy 2014 ODOT FACCR: – ODOT occasionally requests AOS to post <u>immaterial</u> errors to the next years SEFA.

- In most cases, AOS asks that ODOT make that request of the client.
 - If the client mgmt. chooses <u>not</u> to add it to their next years SEFA, then we cannot force them to.
 - If the client mgmt. does add it to a subsequent years SEFA, that makes things more interesting.

Ohio Department of Transportation (ODOT) • Time & Effort:

- FACCR Section B includes testing T&E
- However, testing of items in the FACCR are only required if they are 5% or more of the programs expenditures
- We feel that payroll costs do not typically exceed 5% of 20.205's expenditures, due to the nature of the grant
 - If this is the case, T&E testing is not required just document reasoning
 - If payroll costs are 5% or more, T&E testing is
 meguired.

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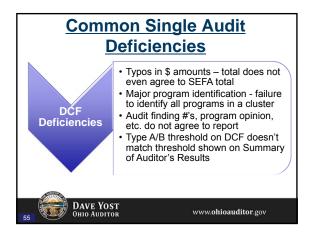










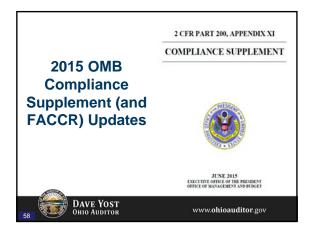






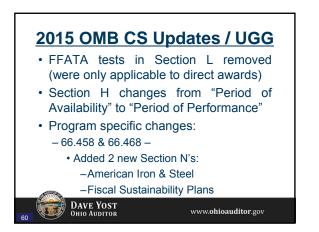


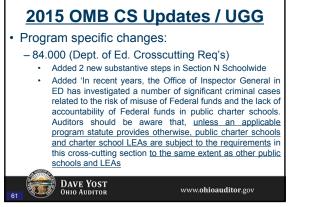




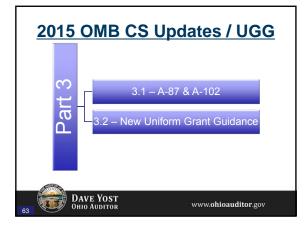








2015 OMB CS Updates / UGG Program specific changes: 84.010 (Title I) ESEA flexibility extension - Ohio was approved for a 1 year extension through Fy 2015. **Added new Section N on Assessment System Security. Added new Section N on Assessment System Security. AGRA programs deleted CDBG Entitlement – 14.253 & 14.254 CDBG State Administered – 14.255 JAG – 16.803 & 16.803 TIF – 84.385**







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Government Fraud Considerations and Case Studies



Lee Wagner, CPA, CFE Senior Manager August 21, 2015

Disclosure

Goals and Overview

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- Fraud types and trends from ACFE's "Report to the Nations"
- Professional Standards related to fraud and journal entry testing in a financial statement audit
- Fraud risks specific to governmental entities
- Case Studies

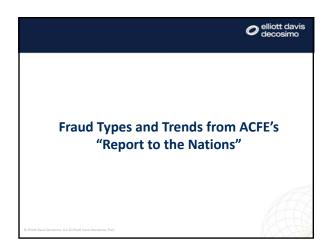


Speaker Background

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- Senior Manager, Raleigh office
- Over 9 years experience in public accounting
- CFE since 2011
- Experience with a variety of forensic accounting and fraud examination projects
- Financial statement audit experience in industries including state and local government and not for profit



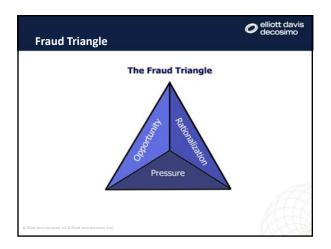


ACFE's 2014 Report to the Nations

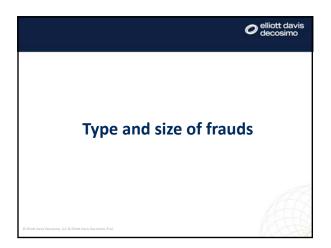
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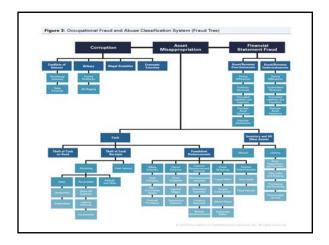
- Association of Certified Fraud Examiners (ACFE) surveys the population of all certified fraud examiners and compiles results
- 2014 report is based on 1,483 cases of occupational fraud as reported by CFEs
- Provide valuable information on how fraud is committed, how it is detected, and how organizations can reduce their vulnerability to the risk of fraud
- Entire report available for download:
 - http://www.acfe.com/rttn-download-2014.aspx



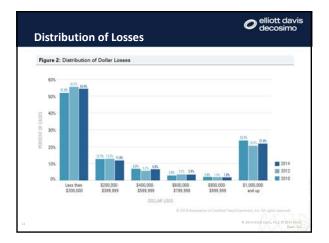
















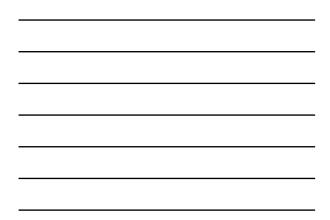
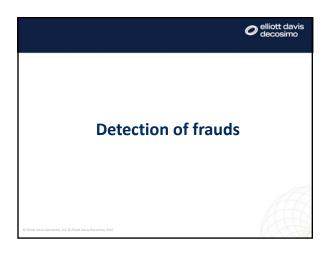
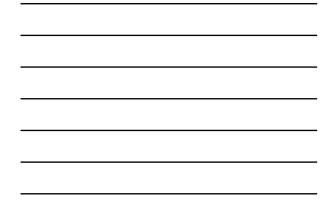


Figure 5: Oc	cupational Frauds by	Category — Median Los	1	
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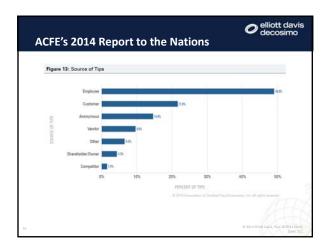


















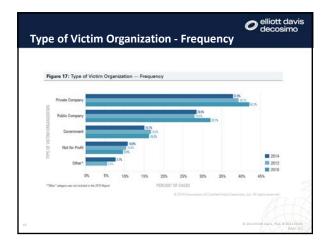




Figure 18: Type of Victim Org.	anization — Median Losa		
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Public Company	1177 84	12mil.mil	
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\$0	\$100,000	\$200,000	\$300,000
*"Other" category was not reclashed in the 2010 Report.	MEDIA		



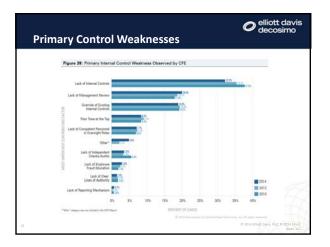
Figure 24: Frequency of Schemes Based on Industry												
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5.Reg	5.7%	11.1%	22.4%	20	21.0%	10.4%	17.76	38.95	1176	-	34.9%	-
Cash Larcary	1115	10.05	8.7%	12.0%	6.7%	11.0%	8.5%	2.2%	27%	11.7%	14.0%	1
Cash on Hand	18.8%	12.7%	2.0%	11.0%	18.75	22.76	1.8%	225	15.4%	11.1%	10%	12
Over& Tempoling	\$75	575	285	2105	10.0%	285	4.85	4.15	an	11.85		
Comption	11.75	3.75	54.25	-	-	22.15	11.05	52 15	7175	2115		38
Expense Rainbursements	415	12.0%	785	20	31.2%	105	4.8%	14.25	14.0%	11.0%	27.0%	20
Financial Statement Fraud	13.2%	5.0%	13.0%	1.0%	10.0%	1.5%	3.2%	12.2%	10.00	\$25		2
Non-Cash	0.15	17.9%	3155	12.0%	12.5%	31.8%	12.0%	11.25	21.2%	17.8%	20.0%	-
Payof	5.2%		115	-	11.75	125	175	1.75	16.75	6.7%	1115	1
Register Disbursements	19%	175	2.0%	325	5.0%	12.0%	125	125	CS	675	235	23
Stimming	37%	11.25	425	11.75	22.0%	10.2%	22.8%	225	6.7%	21.75	10%	125



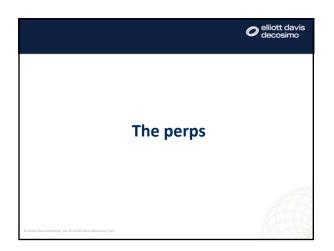


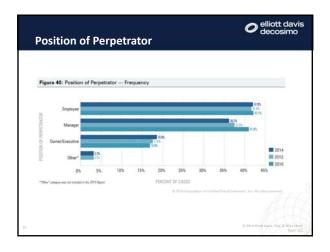




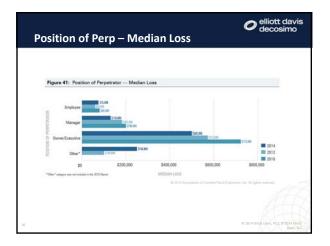




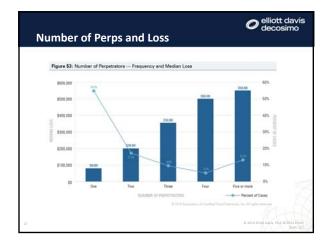


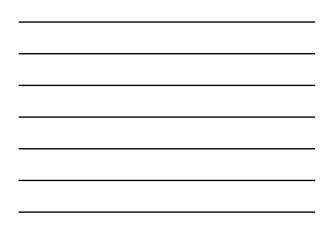


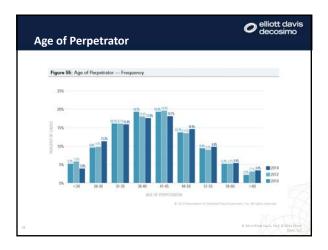




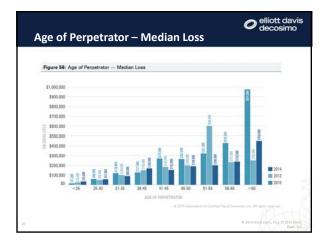




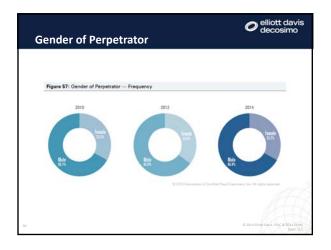




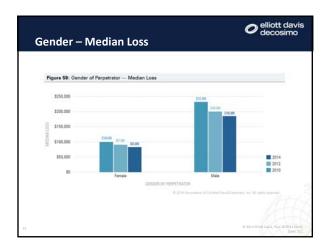




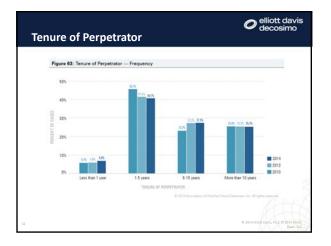




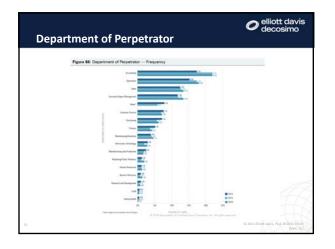




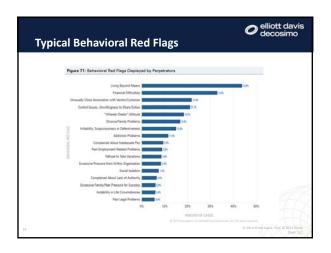




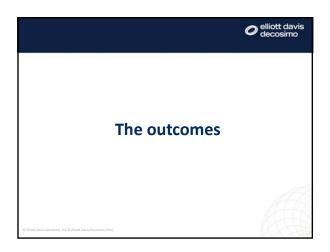




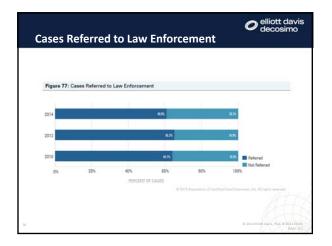




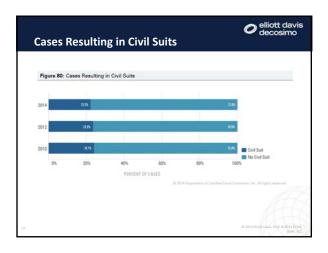




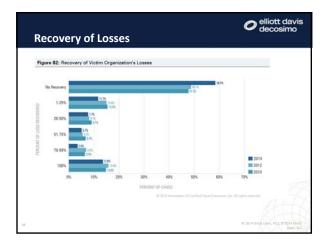




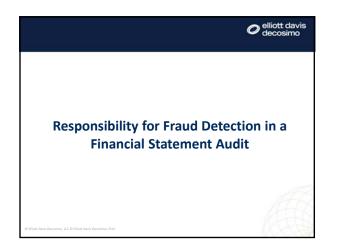






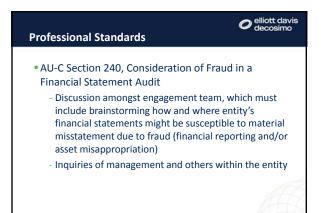






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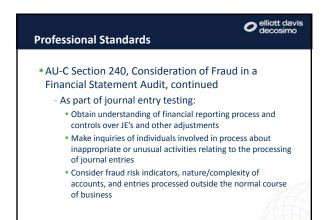
"Our responsibility is to express an opinion on these financial statements based on our audit. We conducted our audit in accordance with auditing standards generally accepted in the United States of America. Those standards required that we plan and perform the audit to obtain <u>reasonable assurance</u> whether the financial statements are free from <u>material misstatement</u>."

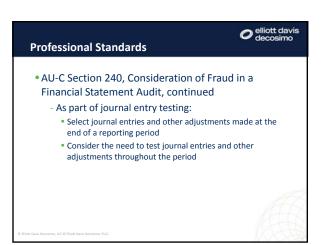


Professional Standards

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- AU-C Section 240, Consideration of Fraud in a Financial Statement Audit, continued
 - Perform procedures responsive to risks related to management override of controls
 - "...test the appropriateness of journal entries recorded in the general ledger and other adjustments made in the preparation of the financial statements, including entries posted directly to the financial statement drafts."



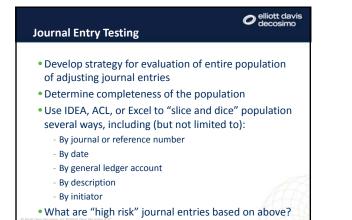


Journal Entry Testing

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Why so important?

- Journal entries used to commit financial statement fraud
- Journal entries often used to cover up asset misappropriation
- So how much time and consideration are we putting into the planning of our test of journal entries?
- Test smarter, not harder!



Journal Entry Testing	O elliott davis decosimo
• Consider:	
- Recurring vs. non-recurring journal en	ntries
 Journal entries recorded on weekends hours 	s or at later
- Round-number amounts	
- Unexpected/unusual combination of a	accounts
 Manual adjusting journal entries 'cam normal recurring entries 	ouflaged' as
 Presence of words such as "plug", "tru "suspense", or "miscellaneous" 	Je-up",



Covernment Fraud Risks • <u>Fraudulent financial reporting</u> examples for local governments: • Misstating revenue/expenditure amounts to meet budget or targeted year-end fund balance • Overstating assets or revenues for bond covenant compliance purposes (revenue bonds) • Overstating assets or revenues for purposes of maintaining bond rating • Overstatement of grant expenditures to avoid having to return unused grant funds Overstation assets or successification of anonaditumes in ander

- Overstatement or misclassification of expenditures in order to meet matching requirements of grants

Government Fraud Risks

- <u>Misappropriation of assets</u> examples for local governments:
 - Skimming of cash receipts
 - Theft of assets (equipment, supplies, gasoline)
 - Fraudulent disbursements
 - Ghost employee schemes
 - Fictitious vendor schemes



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Government Fraud Risks

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- <u>Corruption</u> examples for local governments:
 - Official bribery
 - Procurement schemes (e.g. bid rigging)
 - Kickback schemes
 - Typically involve collusion between governmental employee(s) and vendor
 - Almost always found in purchasing function
 - Vendor will submit fraudulent or inflated invoice to the governmental entity and an employee of the entity helps make sure that a payment is made on the false invoice
 - The employee receives a payment ("kickback") from the vendor

O elliott davis decosimo **Government Fraud Risks** • Example responses to fraud risks - Fraudulent financial reporting • Adjusting journal entry testing • Revenue recognition testing • Testing interfund transfers • Detailed review of accounting estimates for bias



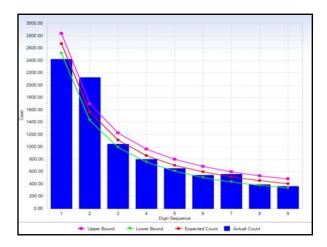
Example Benford's Law Analyses

• IDEA Data Analysis Software

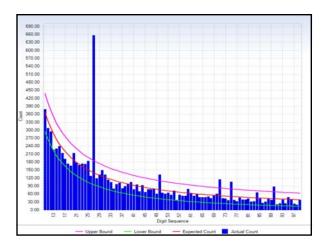
- Population is all disbursement transactions for a medium-sized school district
- First graph is Benford First Digit analysis
- Second graph is Benford First Two Digits analysis



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Other Governmental Risks

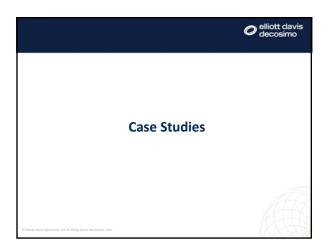
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• Political / reputational risk

- Members of press are almost always present at meetings of governing boards
- Concept of materiality not easily understood by members of governing board or general public
- "Expectation gap" between what our audit is and what others perceive it to be



Other Governmental Ris	sks	✔ elliott davis decosimo
• Risks inherent with elec	ted officials	
 For example, elected s needs to act in accord cooperate with finance 	ance with County pol	
- Competency of electer	d Treasurer	
 Cash accounts not main 	tained on the GL	
 Often the case with ce funds 	ertain sheriff's or cler	k of court
 Accounts balances ma financial statements a receipt/disbursement 	t year end, but what	





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Rita Crundwell – City Comptroller and Fraudster

• Background Info:

- Became comptroller of City of Dixon, Illinois, in 1983
- Dixon: working-class city of approx. 16,000, and the boy-hood home of Ronald Reagan
- Dixon's 2011 general fund operating budget was \$6.9 million
- Rita's salary in 2011 was approx. \$80,000
- Between 1991 and April 2012, Rita embezzled \$53.7 million from Dixon



• How did she do it?

- December 1990: Rita opens a bank account at an Ohio bank (bank subsequently acquired by Fifth Third Bank) in the name of City of Dixon and RSCDA, c/o Rita Crundwell (Reserve Sewer Capital Development Account)
- Rita repeatedly transferred funds from City of Dixon accounts to the RSCDA account
- Rita used funds deposited into RSCDA account for personal expenses and for operations of her race horse breeding business
- Rita generated fake invoices (179 in total), mostly supposedly from the State of Illinois, as support for amounts deposited/withdrawn into RSCDA account

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elliott davis Rita Crundwell – City Comptroller and Fraudster

• How did she get away with it?

- Poor (or altogether nonexistent) segregation of duties
- allowed Rita complete control over Dixon's finances

 Rita made bank deposits and transfers without second
 - signature or authorization
- Rita reconciled all monthly bank accounts Rita prepared interim financial reports for the mayor and
- council
- Rita even received the mail each day
- Blamed Dixon's weak financial position on lagging or late payments from the State of Illinois

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elliott davis Rita Crundwell – City Comptroller and Fraudster

• How was she caught?

- In 2011 Rita took unpaid leave for 12 weeks to focus on her horse breeding operation
- During this time a monthly statement for the RSCDA account was intercepted in the mail by another Dixon employee
- The mayor contacted the FBI it all unraveled from there



elliott davis Rita Crundwell – City Comptroller and Fraudster

- What was the fall-out?
 - Rita's purchases included the following:
 - Two lavish homes in Dixon
 - 80 acres of farmland
 - A house in Florida
 - Extensive updates and construction at her horse farm property
 - A \$2 million custom motor home
 - Several hundred quarter horses (some at more than \$100k)
 - Several vehicles, tractors , horse trailers and trucks (including
 - a 1967 Corvette Roadster)
 - At least \$500 k in jewelry and furs

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Rita Crundwell – City Comptroller and Fraudster

- What was the fall-out?
 - Rita plead guilty to \$53 million scam in November 2012
 - Sentenced to 19 years and 7 months in prison
 - CliftonLarsonAllen, one of two accounting firms used by Dixon, settled with Dixon for \$35.15 million in gross negligence suit
 - Janis Card Associates (other accounting firm) paid \$1 million in settlement
 - Fifth Third Bank paid \$3.85 million in settlement with Dixon

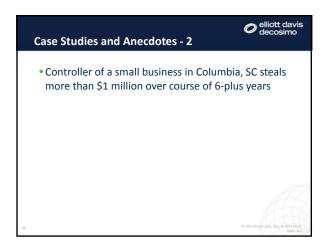
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C elliott davis Rita Crundwell – City Comptroller and Fraudster

Rita Crundwell began working for the City of Dixon while still in high school, was made treasurer in 1983, and by this time she was fully <u>trusted</u> with complete control of the City's finances.

• What was it that Ronald Reagan used to say???





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Small Company Controller and Embezzler

• Background info:

- No names included here as investigation and legal proceedings are ongoing
- Company is industrial laundry / linens facility
- Former controller ("Suspect") was employed by Company from 2005 through 2013
- During that time, Suspect made payments to herself via direct deposit from Company's payroll bank account at least in the amount of \$978,311
- Additionally, Suspect altered two checks totaling \$51,388 to be paid to a shell company owned by Suspect

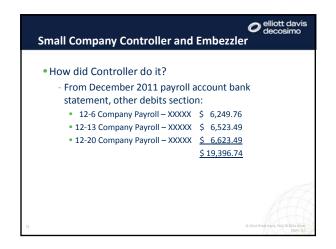
Small Company Controller and Embezzler

• How did Controller do it?

- Two bank accounts: operating and payroll
- In addition to "normal" bi-monthly company-wide payroll disbursements, Controller initiated three smaller direct deposit transactions most months to Controller's personal bank account
- In the GL, these three transactions were recorded as one transaction, most typically as an expense transaction to one of the Company's most significant income statement line items

•	How	did Co	ontroller d	o it?				
Account	Account Description	Period D	late Comments		Journal	Source	Debit	Credit
1000-00	Cash	3	12/1/2011 A/P CHECK R	GISTER	CD-000502	A/P		1.777.1
1000-00	Cash	3	12/5/2011 A/P CHECK R		CD-000503	A/P		86.8
1000-00	Cash	3	12/6/2011 A/P CHECK R	GISTER	CD-000504	A/P		137.627.6
1000-00	Cash	3	12/8/2011 A/P CHECK R	GISTER	CD-000505	A/P		894
1000-00	Cash	3	12/8/2011 A/P CHECK R	GISTER	CD-000506	A/P		35
1000-00	Cash	3	12/13/2011 A/P CHECK R	GISTER	CD-000507	A/P		153.478.8
1000-00	Cash	3	12/13/2011 A/P CHECK RI	GISTER	CD-000508	A/P		76
1000-00	Cash	3	12/13/2011 A/P CHECK RI		JE-002394	G/L		19,396.7
1000-00	Cash	3	12/15/2011 A/P CHECK R	GISTER	CD-000510	A/P		713.6
1000-00	Cash	3	12/16/2011 A/P CHECK RI	GISTER	CD-000511	A/P		55.6
1000-00	Cash	3	12/19/2011 A/P CHECK R	GISTER	CD-000512	A/P		26
1000-00	Cash	3	12/21/2011 A/P CHECK RI	GISTER	CD-000513	A/P		55,237.5
1000-00	Cash	3	12/21/2011 A/P CHECK RI	GISTER	CD-000514	A/P		1,664.8
1000-00	Cash	3	12/21/2011 A/P CHECK RI	GISTER	CD-000515	A/P		1,355.9
1000-00	Cash	3	12/28/2011 A/P CHECK RI	GISTER	CD-000516	A/P		61,228.4
1000-00	Cash	3	12/28/2011 A/P CHECK RI	CISTER	CD-000517	A /P		309.2





Small Company Controller and Embezzler

- How was Controller able to get away with it?
 - Lack of segregation of duties: Controller had responsibilities over payroll, A/P disbursements, and bank
 - reconciliations
 - General manager of Company "reviewed" bank statements but clearly did not understand them or look very closely; evidence does not indicate that General Manager was ever even provided with the payroll account monthly statement
 - Three-payment pattern per month consistently followed over several years, but never during month of September
 - Company year end was September 30

Small Company Controller and Embezzler

- How was Controller caught?
 - Controller quit company early 2013
 - Before leaving Controller got greedy and careless
 Recorded illicit transactions in GL against inventory account
 - rather than expense account (on accident?)Additionally, altered two checks recorded in GL to
 - Additionally, altered two checks recorded in GL to Company's largest supplier and made payable to shell company of Controller
 - Financial statement audit for FY2013: inventory subledger was out of balance which led to subsequent investigation

Small Company	Controller and Embezzler
• What was the	fall-out?
- Known amo	unts embezzled:
• 2007 – \$	
• 2008 – \$,
• 2009 – \$	190,000
• 2010 – \$	143,000
• 2011 – \$	141,000
• 2012 – \$	204,000
• 2013 – <u>\$</u>	121,000 (resigned 4 months in to fiscal year)
• Total – <u>\$ 1</u> ,	.030,000
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Case Studies and Anecdotes - 3 Chief Clerk of Court – Large County in Georgia Long-time civil servant Elected Judge granted Chief Clerk full power to handle business of the court Court held funds in a fiduciary capacity on behalf of

- beneficiaries of estates when third-party guardian/custodian was not legally able to
- Chief Clerk would also siphon court revenues (copying fees, filing fees, etc.) into these fiduciary accounts
- Chief Clerk writes checks to "Cash" and is able to cash at bank where she is a "well known customer"

Chief Clerk of Court • From 2010 to 2014, over \$800,000 in suspicious/questioned disbursements • Federal indictment • County along with banks are parties in several lawsuits filed by attorneys of beneficiaries

Chief Clerk of Court

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- Warning signs
 - Unwillingness to let go of control
 - Known gambling problem
 - Corvette enthusiast
 - Desk drawer full of lottery tickets



Chief Clerk of Court	elliott davis decosimo
 What's next? Chief clerk pleads guilty to two of six c 31, 2015 	ounts on July
- To be continued	
Filest Davis Decision, LLC D Filest Davis Decision, PLC	

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Lessons Learned	
• Are we considering all sides of the fra when we have our planning meetings	0
 Importance of inquiry of personnel at organization 	all levels of the
 Don't be kept awake at night worrying agency funds at your clients! 	g about the
• How good is your journal entry testing	g?
• What other fraud risks are present at How will you respond?	your clients?

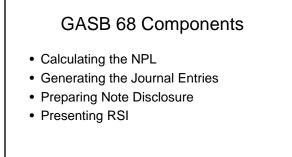
Open Discussion	C elliott davis decosimo
• Questions or comments?	
	Æ
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Celliott davis decosimo Lee Wagner, CPA, CFE Email: lee.wagner@elliottdavis.com Phone: 919.987.2762 Website: www.elliottdavis.com tott Davis Decosimo ranks among the top 30 CPA firms in the U.S. With seventeen offices across are status: the firm provides client across and a range of inductive with smart, customized

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Calculating the NPL

Select the Measurement Date
Determine Proportionate Share (percentage)
Identify:

Collective NPL Information
Pension Expense
Deferred Inflows/Outflows

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1

Select the Measurement Date

• The NPL is to be measured as of a date no earlier than the end of the employer's prior fiscal year, consistently applied from period to period

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• Determined by the employer

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Determine Proportionate Share • A measure of the proportionate

- A measure of the proportionate relationship of the employer to all employers
- Calculated by the retirement system

Collective NPL Information

- Measured as the portion of the actuarial present value of projected benefit payments that is attributed to past periods of employee service, net of the pension plan's fiduciary net position
- · Provided by the pension system

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Pension Expense

- Changes in the collective net pension liability should be included in collective pension expense except for the components of deferred inflows/outflows
- Collective amounts come from the pension system
- Contributions to the pension plan from employers should not be included in pension expense
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Deferred Inflows/Outflows From Pension System

- Difference between expected and actual experience in the measurement of the total pension liability *
- Changes of assumptions *
- Net difference between projected and actual earning on pension plan investments **

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Deferred Inflows/Outflows Calculated by Employer

- Change in the employer's proportion percentage*
- Difference between the employer's contribution and the employer's proportional share of contributions *
- These two amounts can be presented net

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Deferred Inflows/Outflows Amortization

- *Amortized beginning in the current period over the average of the expected remaining service life of all employees. Provided by the pension system.
- **Amortized over a five year period

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Payments Subsequent to Measurement Date

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• Contributions to a plan from the employer subsequent to the NPL *measurement date* and before the end of the employer's reporting period should be reported as a deferred outflow.

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Journal Entries

• Based on current year activity from the pension systems. Journal entries will need to be revised in future years based on the specifics of those years.

Journal Entries Restatement

- Dr. Net Positon
- Cr. Net Pension Liability
- To record the NPL provided by the pension system at June 30, 2014 (measurement date June 30, 2013)

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Journal Entries Restatement

- Dr. Deferred Outflows (pmt subsequent)
- Cr. Net Position
- To defer payments subsequent to the June 30, 2013 measurement date—this amount is identified by the employer

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Journal Entries Current year Activity

- Dr. Net Pension Liability *
- Dr. Deferred Outflows *
- Dr. Pension Expense **

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- Dr./Cr. Deferred Outflows/Inflows ***
- Cr. Deferred Inflows *
- Cr. Deferred Outflows(pmt subsequentprior year)

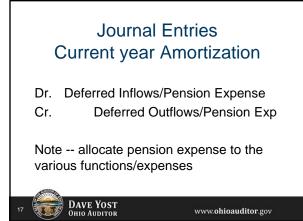
Journal Entries Current year Activity

- * From pension system
- ** From pension system—allocated to various functions/expenses
- ***The difference between the proportionate share of employer contributions and actual employer contributions is recorded as a deferred outflow/inflow

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• Consider GASB 68 paragraph 56

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Journal Entries Current Year Payments Subsequent

Dr. Deferred Outflows (pmt subsequent) Cr. Pension Expense

Note: allocate pension expense to the various functions

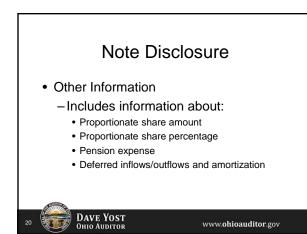
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Note Disclosure

- Description of the plan
- Information about the employer's proportionate share of the collective net pension liability
 - Includes disclosure about actuarial assumptions

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RSI 10 Year Schedule 1 Determined as of the Measurement Date

- Employer's percentage of the collective NPL
- · Employer's amount of the collective NPL
- The employer's covered employee payroll

RSI 10 Year Schedule 1 Determined as of the Measurement Date

- The employer's proportionate share (amount) of the collective net pension liability as a percentage of the employer's coveredemployee payroll
- The pension plan's fiduciary net position as a percentage of the total pension liability

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RSI 10 Year Schedule 2 Determined as of Fiscal Year End

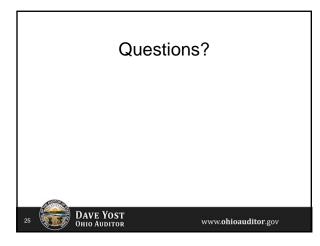
- Contractually required employer contribution (A)
- Amount of contributions recognized by the pension plan in relation to the contractually required employer contribution (B)
- Difference between A and B

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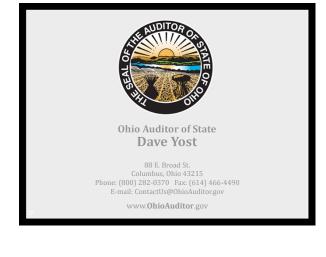
RSI 10 Year Schedule 2 Determined as of Fiscal Year End

- The employer's covered-employee payroll
- The amount of contributions recognized by the pension plan in relation to the statutorily or contractually required employer contribution as a percentage of the employer's covered-employee payroll

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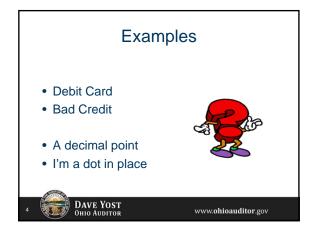












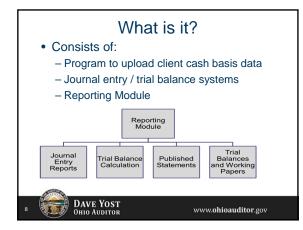








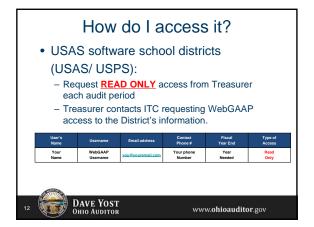








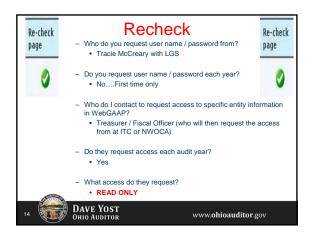






	How do I access it?						
	 Other (non-USAS) users: Request <u>READ ONLY</u> access from Fiscal Officer each audit period Fiscal Officer sends fax (419-267-5248) or pdf and email to NWOCA (<u>gaap@nwoca.org</u>) on entity's letterhead to WebGAAP Team requesting access to their information 						
	User's Name	Username	Email address	Contact Phone #	Fiscal Year End	Type of Access	
	Your Name	WebGAAP Username	you Ryouremail.com	Your phone Number	Year Needed	Read Only	
13	DAVE YOST						





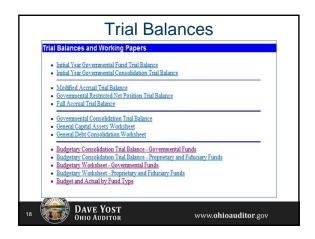




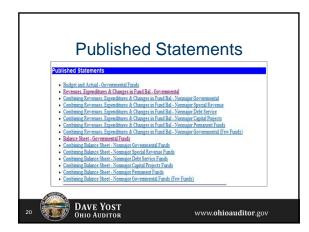


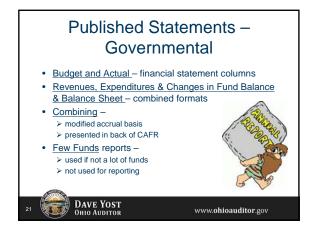


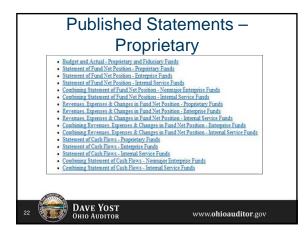




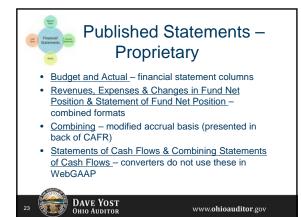


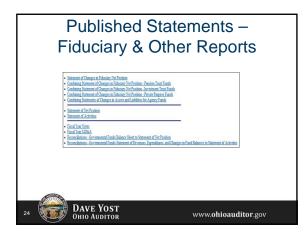




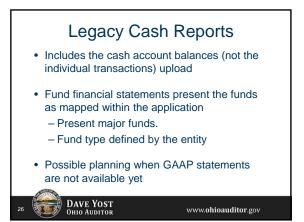


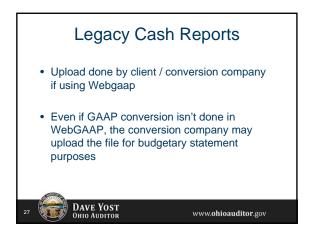






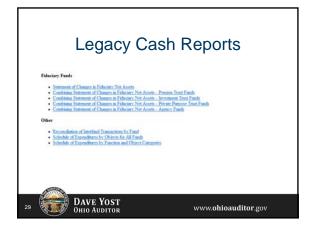










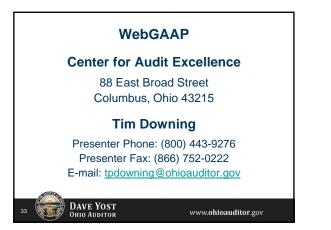










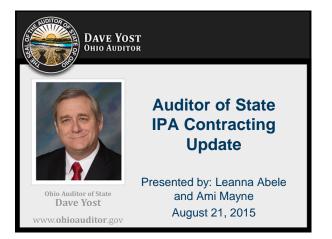


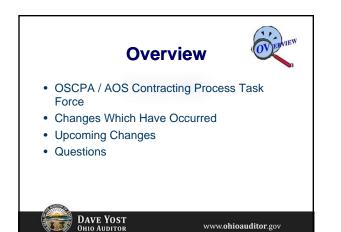


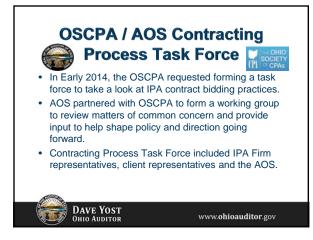
Ohio Auditor of State Dave Yost

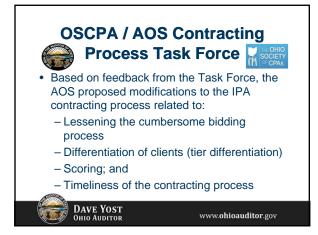
88 E. Broad St. Columbus, Ohio 43215 Phone: (800) 282-0370 Fax: (614) 466-4490 E-mail: ContactUs@OhioAuditor.gov www.**OhioAuditor**.gov

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Changes Which Have Occurred

 Appointment of a Coordinator of Audit Administration in the Center for Audit Excellence (CFAE) - to implement changes to the contracting process and, once implemented, provide an oversight function to ensure timeliness and consistency.

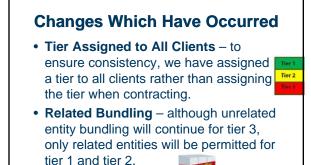
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Changes Which Have Occurred • Change in Definition of Tier 3 Clients – Tier 3 clients are now defined as entities which are small and/or lower risk, with no customized or specific IPA experience required, and reflect no unusual transactions. Entities which prepare CAFRs are excluded from Tier 3.

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Changes Which Have Occurred

 Separate Forms for Modifications and Extensions – we have split the previous Modification/Extension Agreement Form into:

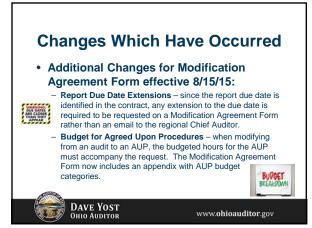
- Modification Agreement Form - initiated by the IPA firm/client (refer to 9/8/14 email

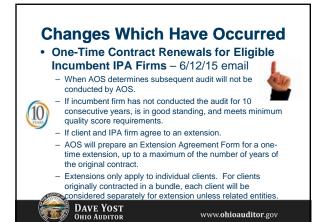
regarding contract modification issues – available on AOS website)

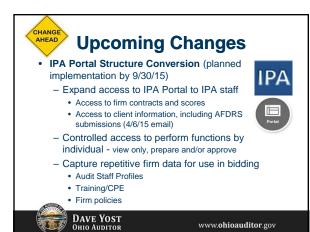
- *Extension Agreement Form* – initiated by AOS.

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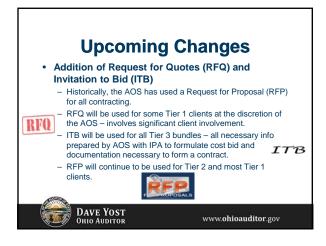
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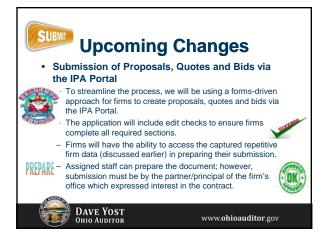


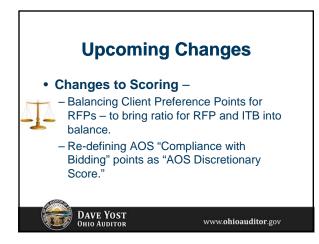


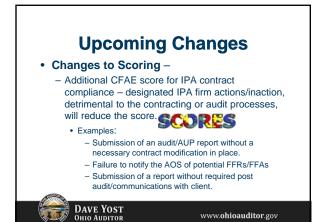


Upcoming Changes • IPA Portal Structure Conversion (planned han implementation by 9/30/15) - Automated Invoice Processing · Designated IPA firm staff will create invoices for clients via the IPA Portal by AOS project number Application includes edit checks - 80% limit prior to acceptance by AOS, MBE/EDGE requirements, etc. Partner/Principal required to submit invoice for AOS approval · Immediate AOS approval by email to the IPA firm and the client • Email will suffice for client billing; however, IPA may provide additional detail to client if necessary. (Important to ensure client contact info up-to-date with AOS!) DAVE YOST Ohio Auditor www.ohioauditor.gov





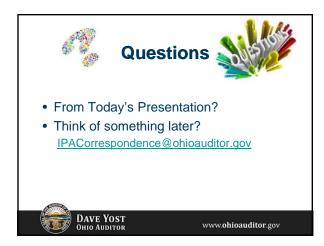












Auditor of State

Presenters:

Leanna Abele, Asst. Chief Deputy Auditor Ami Mayne, Coordinator of Audit Administration E-mails: <u>LMAbele@ohioauditor.gov</u> <u>AMMayne@ohioauditor.gov</u>

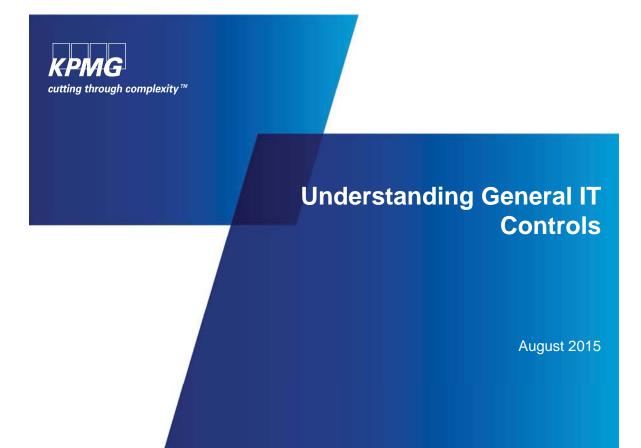
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Purpose

To Gaining an understanding of the role IT General Controls play in auditing of critical business processes and financial data

- Planning and Scoping of GITCs
- Types of General IT Controls
- Typical deficiencies and how they impact the overall Audit

Planning and Scoping of GITCs

10. N. N. J. Co. 2007			
		- 2007	
NUMER	Notes	1999	
Financial Assetts			
Cash		49.000	18.74
Persitation		10.00	177.68
Total Financial Janam	-	-000	-169
San Financial Basels			
Land and buildings		1796.462	
Infrastructure, giart and encomment		54.549	
Anone held for sale	10		140
htterpline	16	4.000	10.70
Internation		14,200	- 222
Other rule: Transist assess	39	1.114	2.40
Total Man Program Assess		THEFT	
			-
Total Assets		1,406,802	2,154,618
LANDA FYER			
Percellent			
Suppliers			10.47
Offer peoples		11.062	2.85
Tene Paultine		-	- 10
Printer Bearing Loophies			
		8,214	
Time Preview Rearing Collections			
Proventies			
Engineers			
		8.488	
Total Provinces		118,008	- 553 A.W
Tanul Liabilities		PUH	174,844
NET ADAETS		114.00	3,877,956
EDOITY			
Commissioned anguing		1.001.000	
Plantat		361,165	207.64
Peterson suppose () show limit adopt		341.425	214.275
		110.00	-1012
FORML EQUITY		A 194,044	1807.00
Contracts assaults		1014-0010	100.74
Non-surrent Rabilities		12,010	15,802

This report shows the financial condition of the company as of a particular date .It is an itemized statement that summarizes the assets and liabilities of a business as on a given date usually at the end of a financial year. This is the company's report card.

Balance Sheet

This report shows the total amount of sales, all costs incurred in achieving them and other operating costs. This helps see if the company has recorded a profit for that particular month.

Income Statement

In many cases, while a transaction occurs it is not recorded on the income statement. In such cases it is put in the statement of cash flow. For example a loan that is taken and kept aside for later use. This statement records this cash transaction.
Statement

of Cash Flow

	INCOME	Notes	2007	2006 \$1000
	Revenues from Government		Section Section	1000
	Goode and services	54 38 30	802,841	733,965
	Differ revenues	38	102,645	92,330
	Total Revenue	80	3,262	6,814
	LODP Mevenue		104,804	630.209
· I -	Gaine			
	Other gains	30	1.600	
	Not foreign exchange gams	20	835	2.006
	Total Gains		2.439	2,409
				- 1000
	Total Income		841,277	EDUX1E
	EXPENSES.			
	Employees	44.	340.104	210.891
	Suppleys .		291.632	219,804
	Diamen	40	957	56
	Depreciation and amortisation	40	67,598	62,260
	Write-down and impairment of assets		1.872	388
	Finance costs	46	647	3.874
	Net loss from discount of assets	-0	2.664	1.829
	Other expenses	44	48	1,839
	Total Expension	· · · · ·	805.629	699.354
			800,018	100.356

DEPARTMENT OF PORESCH AFTA INCOME STATEMENT for the year ended 20 June 2007

GRESULT

Cash Flow from Operations	\$1,800.00
Net Income	\$259.00
Adjustments	\$1,541.0
Depreciation Expense	\$-100.0
Accounts Payable	\$130.0
Credit Card Account	\$50.0
Customer Credits	\$0.0
Sales Tax Payable	\$1.2
Accounts Receivable	\$986.7
Inventory Asset	\$473.0
Cash Flow from Investing	\$-1,000.0
Equipment	\$-1,000.00
Cash Flow from Financing	\$1,500.00
Opening Balance Equit	\$2,000.0
Owner's Equity	\$-500.0
Draw	\$-500.0
Investment	\$0.0
Net Change in Cash	\$2,300.0

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135,638 135,242

What is a General IT Control

General IT Controls (GITC's): represent the foundation of the IT control structure. They help ensure the reliability of data generated by the IT systems and support the assertion that systems operate as intended and that the output of the systems is reliable.

IT Application Control (ITAC): Is a business process control, and allows action to be automatically performed by the software application. An ITAC control should demonstrate that software applications used for specific business processes are properly maintained, are only used with proper authorization, are monitored, and are creating audit trails.

Relation between ITAC Controls and ITGC Controls?

If an application control (or business process control) contains an automated component, then GITC's need to be tested because of the IT component (or automated component) within the business process control (ITAC Control).

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Recent PCAOB Findings

Scoping

- An important IT system was not scoped into the audit (e.g. report writers, infrastructure, service providers, interfaces)
- ITGC were tested for a system which no application controls existed
- IT systems for component audits were improperly scoped out of the audit
- IT scoping decisions were not documented

Addressing test exceptions

- Test exceptions were noted, however were not assessed as control deficiencies
- Control deficiencies were noted, however the impact on the audit approach was not considered

Incompleteness of testing

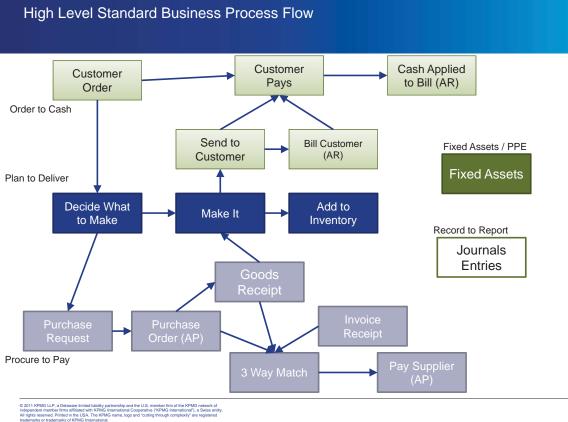
- Completeness and accuracy of critical reports and populations (both process and IT)
- Test of 1 application controls, completeness and accuracy of a report

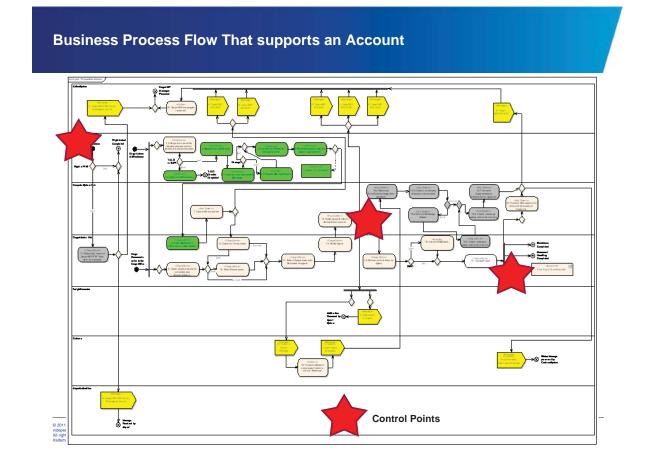
Timing

- Testwork was performed at interim and not properly rolled forward to year-end
- Testwork was performed late (after year-end)

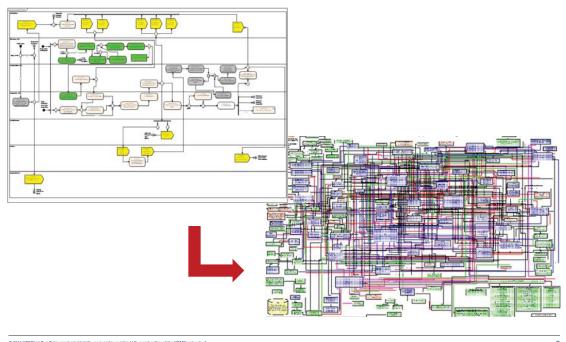
Reliance on Others

- Management's objectivity and competence was not sufficiently documented for IT professionals
- IT reliance approach (reperformance) not consistent with audit team and not documented





IT System Landscape that Supports a Business Process



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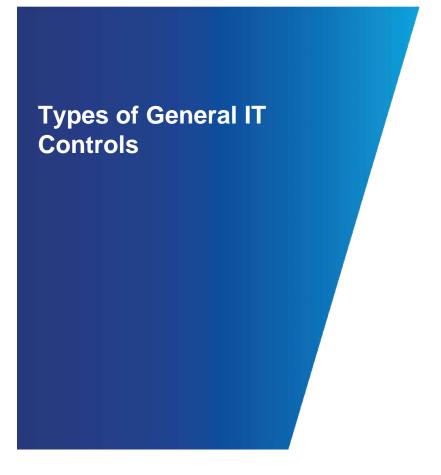
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Application Controls Map to General IT Controls

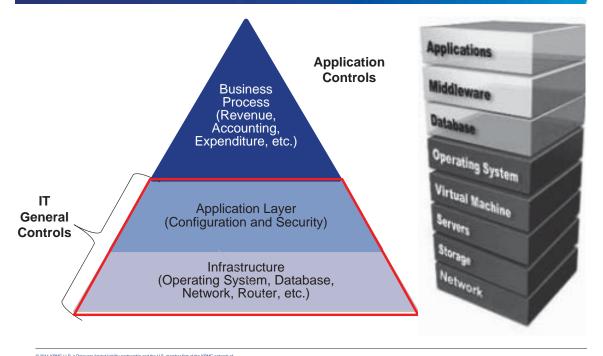
Type of Application Controls:

- Access Approval: Validation of appropriateness for specific transactional access
- Calculation: Automated control that creates a new transactional number/calculation
- Edit Check: System Validation of a field criteria
- Interface: The automated flow of data from one in scope application to another
- Key Report: A report utilized within the audit
- Work Flow: Automated transactional process with designated approvers within an in scope application.

Туре	Access	Change Management	Computer Operations
Approval	\checkmark		
Calculation	\checkmark	\checkmark	\checkmark
Edit Check	\checkmark	\checkmark	
Interface	\checkmark	\checkmark	\checkmark
Key Report	\checkmark	\checkmark	\checkmark
Work Flow	\checkmark	\checkmark	\checkmark







General IT Processes to consider

Control environment,	 Controls designed to shape the corporate culture or "tone at the top."
Change management procedures	 Controls designed to ensure changes meet business requirements and are authorized.
Source code/document version control procedures	Controls designed to protect the integrity of program code
Software development life cycle standards	 Controls designed to ensure IT projects are effectively managed.
Logical access policies, standards and processes	 Controls designed to manage access based on business need.
Incident management policies and procedures	 Controls designed to address operational processing errors.
Problem management policies and procedures	 Controls designed to identify and address the root cause of incidents.
Technical support policies and procedures	 Policies to help users perform more efficiently and report problems.
Hardware/software	 configuration, installation, testing, management standards, policies and procedures.
Disaster recovery/backup and recovery procedures	 Controls to enable continued processing despite adverse conditions.
Physical security	 Controls to ensure the physical security of information technology from individuals and from environmental risks.

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IT General Controls Example of Groupings

		Network	C	OS Database		Applications							
		Windows	iSeries	Unix	DB	DB	DB	App	Арр	Арр	App	App	Арр
	Data Center Access		LA-1 - Data Center Access										
	Password Parameters	LA-2.2 (Password Parameters - OS Layer) LA-2.2 (Password Parameters - OS Layer)						LA-2.3 (Password Parameters - Application Layer)					
	New User Access				L	4-3 - New Use	r Access Appro	val					
	Terminations					LA-4 - Te	rminations						
Logical Access	User Access Reviews				V	-5 (Annual Us	er Access Revi	ew)					
cognariatecoo	Administrative Access	LA-6.1 (Administrative Access - Network Domain Layer)	(Admin	LA-6.2 LA-6.3 (Administrative Access - (Administrative Access - Database Layer)		LA-6.4 (Administrative Access - Application Layer)							
	Vendor Default and Generic Accounts	LA-7.1 (Vendor Default and Generic Accounts - Network Domain Layer)	LA-7.2 (Vendor Default and Generic Accounts - OS Layer)		LA-7.3 (Vendor Default and Generic Accounts - Application Layer)								
	Segregated		MC-1 (Segregated Environments)										
Change	Program Source		MC-2.1 (Object/Program Source Change Test and Approval)										
Management	Emergency Change		MC-3 (Emergency Changes)										
	Segregation of Duties MC-4 (Program Change: Segregation of Duties)												
Computer	Job Scheduling		OP 1 (Incident Management) OP-3 (Job Scheduling Access)										
Operations	Job Scheduling Access												
	Backups		OP-4 (Backup Scheduling)										

Typical Access Controls

- Data Center Access Physical access to computer facilities that house in-scope systems is restricted to authorized personnel.
- Password Configurations In-scope systems (application, OS and DB) require an authentication mechanism and appropriate password controls (min. length, max. age, complexity) in order to gain access.
- New User Access User access requests for additions and modifications to in-scope systems (application, OS and DB) are authorized by Management prior to implementation.
- Terminated Users User termination requests to in-scope systems (application, OS and DB) are implemented in a timely manner.
- User Access Review Management performs a periodic review of active users and their respective
 access rights for in-scope systems (applications, OS and DB) to identify and remove unauthorized
 access and Segregation of Duties conflicts.
- Administrative Access Access to powerful/administrative IDs for in-scope systems (application, OS, and DB) is restricted to authorized personnel.
- Vendor and Generic Accounts Access to vendor default and generic IDs for in-scope systems (application, OS, and DB) is restricted to authorized personnel and use of the ID is understood by management.



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Typical Change Management Controls

- Separated Environments- Environments for in-scope applications are physically or logically separated.
- Segregation of Duties- Access for migrating changes to in-scope systems into production is controlled and restricted to authorized personnel that do not have the ability to develop program changes.
- Test and Approved Changes Changes to in-scope systems are authorized, tested (both IT and business/user testing) and approved by Management.\
- Emergency Change Approval Access to emergency change IDs is granted on an as needed basis and approval is documented in a ticket. Access to the IDs is automatically removed within 24 hours of being granted.
- Change Monitoring Management performs a periodic review, for applications with an SOD issue, of changes to the application to identify tickets were appropriate created and approved prior to implementation.



Typical Computer Operations

- Job Scheduling Access: Access to job schedulers for in-scope systems is restricted to authorized personnel.
- Job Scheduling Notification System jobs in the production environment are configured to notify management in the event of a job failure
- Incident Management Operational events (incidents, problems and errors) are recorded and tracked to resolution
- Backups Backups are configured to run on a periodic basis.



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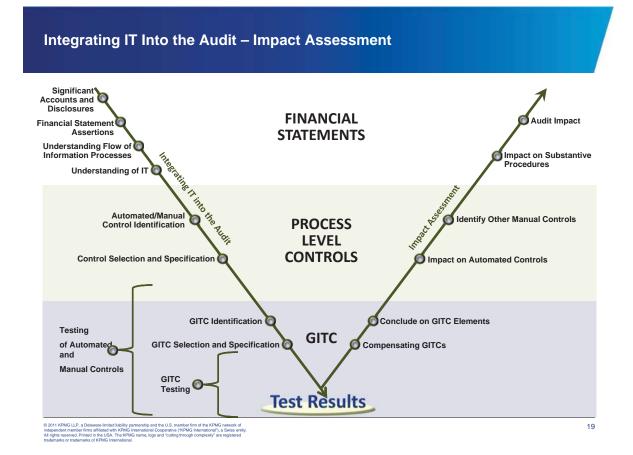
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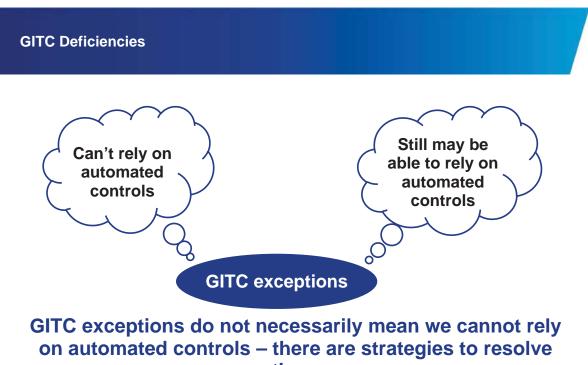
Typical General IT Control Deficiencies

Logical Access	Change Management	Computer Operations
Data Center Access	Segregated Environments	Job Scheduling Notification
Password Parameters	Segregation of Duties	Job Scheduling Access
New Users	Program Change Test & Approval	Incident Management
Terminations	Emergency Change	Backup Scheduling
Admin Access	Change Monitoring	
User Access Reivew		
Vendor and Generic Accounts		

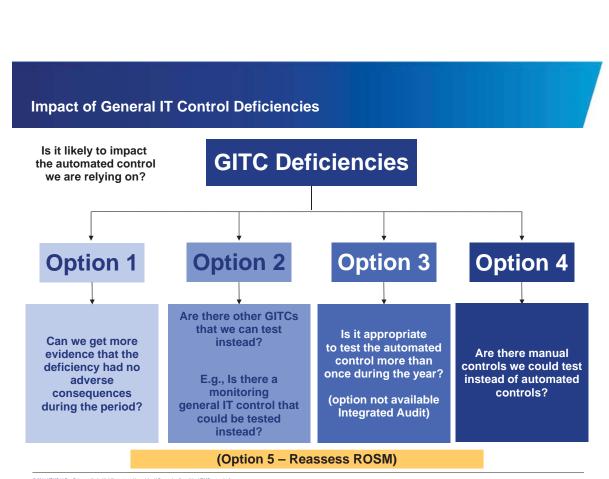
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