# Internal Controls FMC March 2020







# ✓ Introduction

- ✓ Onspring
- Applying Internal Controls Concepts to Onspring Entry
- ✓ Onspring Reporting

# Why Internal Controls?



### **Importance of our Internal Control System:**

- Effective internal controls provides reasonable assurance that <u>objectives of the organization will be</u> <u>achieved:</u>
  - Accurate financial reports
  - Maintain fiscal health of the State
  - Grant compliance
  - Accomplishing the mission of your organization

Remember in government we are ultimately protecting and serving the taxpayer.

# **Overall Impact**



- Remember the internal control <u>system impacts all</u> <u>aspects</u> of your organization and daily functions.
- Don't wait for an audit finding before reviewing the internal control system design and operation.
- Also, don't just think of it as completing the submission but more an <u>overall culture</u>

change, training, discussion, etc.



# Internal Control Process......



- 1. Start by establishing objectives, for example:
  - "The accounting records comply with Standards and are complete and accurate."
- 2. Then identify risks getting in way of accomplishing the objective, for example:
  - Key assets are not all recorded at the proper amount, in the proper fund, in the proper account code or in the proper basis of accounting.
- 3. Consider how much risk are you willing to allow (risk tolerance)
  - Generally established as "de minimis"

# .....Internal Control Process



- 4. Consider "risk responses" already in place
  - Control activities component (common tasks)
- 5. Do any of those control activities offset the risk
  - If residual risk remains, need to consider response (which could be doing nothing)

Don't forget, Organizations are still responsible for risks and control activities relating to:

- Service organizations (outside third parties)
- Fraud and Information Systems
- Etc.



- Once system is in place, how is it working?
  - Management (not Auditors) is responsible for monitoring

- Determine if the controls were :
  - applied at relevant times
  - in a consistent manner
  - by whom they were applied

# **Upcoming Submission to SAO**



Risk Assessment/Control Activities (RA/CA) submission will be <u>due before end of this fiscal year</u>:

- Submission will be done via Onspring (online software)

   Additional instructions will be provided
   Scheduled to open late April
- Previous year answers will be populated in Onspring

Remember.....all organizations will continue to review and certify this submission annually.





## **Onspring Advantages**



- Onspring has many advantages:
  - Easier maneuvering
  - Standardized listing of key control activities
  - Enhanced visibility of gaps in controls
  - Reporting capabilities

Essentially contains same content as RA/CA excel template.

# **Onspring Login**



Onspring	CFO will receive "welcome" email from Onspring to activate
Username	their user account.
Password	
Login	
Forgot Password?	

## **Onspring Summary Report**



ly Ne	w Risk Asses	sment Records	Click or Management Risk									
<b>•</b>	Agency ID	Agency Nam	Related Risk Q <sup>†</sup>	1	Tolerance	Inherent Risk	Likeliho	Impact	Response	Residual Risk	Updated By	Updated Date
	00001	Test Org for	2	Cash (e.g. crodit card, lockbox collections, cash on hand, LGIP, investments, etc.) is not all included or not recorded at the correct amounts in the accounting records.	de minimis	High		• Low		Low		3/20/2020 1:54 PN
-	00001	Test Ora for	₃ ect "pe	Cash (e.g. credit card, lockbox collections, cash on hand, LGIP, investments, etc.) that is not valid (such as cash that does not exist) is recorded in the	de minimis	<ul> <li>High</li> </ul>	High	High	Acceptance	High		3/11/2020 2:59 PN
		Sel	ect pe	card, lockbox collections, cash on hand, LGIP, investments, etc.) is not recorded in the correct chartfields in the accounting records.	de minimis	e Medium	• Low	O Medium	Avoidance	Low		3/11/2020 2:59 PM

Agency ID 00001	gency ID and Name	
Agency Name Test Org		
Reporting Objective* The accounting records comply with St	andards and are complete and accurate	
Related Risk Question Library Record Relate		
Risk Statement		
Key assets are not all recorded at the	proper amount, in the proper fund, in the proper account code or in the proper basis of accounting.	
Risk Statement* Key assets are not all recorded at the p	roper amount, in the proper fund, in the proper account code or in the proper basis of accounting.	
Specific Risk Examples* Recording - Cash (e.g. credit card, lock accounting records.	box collections, cash on hand, LGIP, investments, etc.) is not all included or not recorded at the correct amounts in the	
Tolerance* de minimis		
Inherent Risk e High	▼	
Inherent Risk Justification The process has a high inherent risk a	is cash has a high susceptibility of fraud and/or theft. test	
	A	
Likelihood 🕒 Low	▼	
Likelihood Justification test		

	•									_	
Impact		Low								•	
Impact Justification	test	t									
P										4	
Response	Ac	ceptance								•	
ontrol Activity Library	R	elate	Q								Ð
		Control ID	Control Name	Detailed Description	Control Importance	Control Type	Control Frequency	Control Placement	Automation	Control Utilized?	
	2	RCD25	Accounting System - Automated interface between non-payroll subsystems and GL/AP	Non-Payroll (offline vouchers and spreadsheet journals) transactions automatically post to cash/liability accounts in the accounting system	Key	Green Book - Financial Reporting	Periodically as Needed	Prevent	Automated	N/A	
		RCD23	Accounting System - Automated interface between Payroll and GL/AP	Payroll transactions automatically post to cash/liability accounts in the accounting system (in Teamworks upon release of labor distribution from HCM)	Key	Green Book - Financial Reporting	Periodically as Needed	Prevent	Automated	Yes	
		RCD29	Accounting System - Automated interface between revenue subsystems and GL/AP	Transactions automatically post to cash/receivable accounts (for example, in Teamworks from the AR module)	Key	Green Book - Financial Reporting	Daily	Prevent	Automated	Yes	v





State Accounting Office



State Accounting Office

## **Onspring – Certification**

Dist. As a second of Confidential



After all specific risk example steps are reviewed and updated as necessary, CFO <u>must</u> certify.

Risk	Ass	sessment Certification					=
		Agency ID	Agency Name	Certification	Updated By	Updated Date	
	$\square$	00001	Test Org			3/11/2020 2:59 PM	*
							1 - 1 of 1 items
				28799			8
		Agency ID	00001				=
		Agency Name	Test Org				
		Certification	🔲 🥑 I certify that this informati	ion is accurate			
		Updated By					
		Updated Date	3/11/2020 2:59 PM				
= R	equi	ired Field			Previous	s Next Save	Cancel

# Applying Internal Control Concepts to Onspring Entry



# **Onspring – Specific Risk Examples**

	28852	8
Agency ID	00001	₹ ^
Agency Name	Test Org	
Related Risk Question Library Record	Relate	
	Risk Statement	
Specific Risk Examples	Key assets are not all recorded at the proper amount, in the proper fund, in the proper account code or in the proper basis of accounting. Cash (e.g. credit card, lockbox collections, cash on hand, LGIP, investments, etc.) is not all included or not recorded at the correct amounts in the accounting records.	
Tolerance	de minimis	
Inherent Risk	High 🗸	
Inherent Risk Justification	The process has a high inherent risk as cash has a high susceptibility of fraud and/or theft. test	
Likelihood	Low	
Likelihood Justification	test	4
Impact		-
= Required Field	Previous Next Save Ca	incel

SAO State Accounting Office

# **Onspring – Risk Tolerance**



	28852					۲
Agency ID	00001				=	
Agency Name	Test Org					
Related Risk Question Library Record	Relate					
	Risk Statement Key assets are not all recorded at the proper amount, in the proper fund, in the proper account code or	r in the proper ba	sis of accounting.			ľ
Specific Risk Examples	Cash (e.g. credit card, lockbox collections, cash on hand, LGIP, investments, etc.) is not all included or records.					
Tolerance	de minimis					]
Inherent Risk	High				•	
Inherent Risk Justification	The process has a high inherent risk as cash has a high susceptibility of fraud and/or theft. test					
Likelihood	• Low				•	
Likelihood Justification	test				4	
Impact					-	-
= Required Field		Previous	Next	Save	Cancel	

# **Onspring – Inherent Risk**



	28852			8
Agency ID	00001			<b>₽</b> ^
Agency Name	Test Org			
Related Risk Question Library Record	Relate $\mathcal{P}$ Risk Statement	Inherent risk rati selections are limited		
Specific Risk Examples	Key assets are not all recorded at the proper amount, in Cash (e.g. credit card, lockbox collections, cash on hand, LGIP, in- records.	specific risk examp		g
Tolerance	de minimis			
Inherent Risk	High			•
Inherent Risk Justification	The process has a high inherent risk as cash has a high susceptibility	of fraud and/or theft. test		
Likelihood	Low			•
Likelihood Justification	test			4
Impact	low			
= Required Field		Previous	Next Save	Cancel



### <u>Likelihood</u> - Level of possibility that a risk will occur:

<u>Without</u> considering the **known control activities** (internal controls) actually occurring, analyze how *likely* the specific risk would be.

When answering in Onspring, certain factors to contemplate could be:

- Ease of access to asset
- Liquidity of the asset
- Manual vs automated processing
- Etc.



# **Impact** - Scale of the deficiency that could result from the risk occurring.

<u>Without</u> considering the **known control activities** (internal controls) actually occurring, analyze what the *scale* of the specific risk would be.

When answering in Onspring, certain factors to contemplate could be:

- Size
- Pace
- Duration
- Etc.



# Risk Justifications are required and allow for free form entry.



# Management designs risk responses to respond to the analyzed risks. Responses could include:

- Acceptance no action is taken
- <u>Avoidance</u> action is taken to stop the operational process (for example, stop allowing cash to be collected offsite or stop collecting cash at all)
- <u>Reduction</u> action is taken to reduce the likelihood or magnitude of the risk (for example, segregate duties, have more oversight, etc)

### **Onspring – Risk Response**





### **Control Activities Reminders**



- Actions management establishes through policies and procedures to achieve objectives and respond to risks (including fraud risks) in the internal control system
- When answering in Onspring, certain tips to answer Control Activities Section could be:
  - Refer to Statewide Internal Control Guidance Control Activities
  - Brainstorm with personnel responsible for that specific risk example
  - Review job description or procedures manuals

# **Control Activities Library**



- Onspring contains library listing of standardized control activities:
  - Expected key controls that apply to almost all Organizations
  - Includes controls relating to the accounting systems, such as Teamworks
  - Differ by specific risk example step
  - "Mapping" of previous Organization answers to control activity in library listing
- Organizations will identify if this control activity is currently <u>in place.</u>



#### **Control Activity Library**

				Link t	o histo	orical m	s Napping	tate Accountin B report	ng <b>f</b> Office
Re	elate	Q						, cpor	
	Control ID	Control Name	Detailed Description	Control Importance	Control Type	Control Frequency	Control Placement	Automation	ontrol Utilized
1	RCD25	Accounting System - Automated interface between non-payroll subsystems and GL/AP	Non-Payroll (offline vouchers and spreadsheet journals) transactions automatically post to cash/liability accounts in the accounting system	Key	Green Book - Financial Reporting	Periodically as Needed	Prevent	Automated	N/A
11 <sup>2</sup>	RCD23	Accounting System - Automated interface between Payroll and GL/AP	Payroll transactions automatically post to cash/liability accounts in the accounting system (in Teamworks upon release of labor distribution from HCM)	Key	Green Book - Financial Reporting	Periodically as Needed	Prevent	Automated	🕑 Yes
P	RCD29	Accounting System - Automated interface between revenue subsystems and GL/AP	Transactions automatically post to cash/receivable accounts (for example, in Teamworks from the AR module)	Key	Green Book - Financial Reporting	Daily	Prevent	Automated	🕑 Yes
1	RCD13	Accounting System - Balanced journals (FSCM in control number)	Accounting system requires balanced entry for journals.	Key	Green Book - Financial Reporting	Daily	Prevent	Automated	😢 No
<b>P</b> <sup>2</sup>	RCD17	Accounting System - Batch Processing	Routine batch processing is performed by accounting system that automatically edits and posts any entries not in valid and posted status and also produces an error report. Entries are posted to both the ledger and sub-ledger.	Key	Green Book - Financial Reporting	Daily	Prevent	Automated	S Νο
	RCD4	Appropriate Documentation - Manual entries	Manual entries and adjustments are recorded in to the accounting records only when approved and accompanied by supporting documentation. (ONL entries in Teamworks)	Key	Green Book - Financial Reporting	As Entered	Prevent	Manual	😢 No
<b>P</b> <sup>2</sup>	RCD7	Approval Delegation of Authority - Established	Delegation of Authority has been establish to identify personnel responsible for recording and adjusting item.	Key	Green Book - Financial Reporting	Periodically as Needed	Prevent	Manual	😢 No

#### **Onspring - Historical Control Mappings Example**

State Accounting Office

#### My Historical Control Mappings

Related Agency/Org	Historical Controls Documented	Related Control Library Record	Control Name	Control Description	Related Risk Library Record
	* AR: Miscellaneous cash revenue deposits are received and signed for by the Supervisor, then passed on to the AR processor and matched monthly to receipts entered into the system. Deposits are compared to the bank account, daily deposit log and to the subsidiary accounting report (AR4710407). The senior accountants review the past due reports on a monthly basis to identify uncollected cash. * Budget staff review and approve all expenses, coding and authorizations before expenses are processed for payment. A monthly review of postings are carried out and compared to budget , errors are identified and passed to the relevant supervisor for corrections. A Finance Clerk, who is independent of the AP process, reviews AP vouchers daily against the actual documentation or AP upload file for discrepancies between invoices and payments before checks are sent out. ACH payments are pulled back if they are paid to the incorrect person. Addresses, vendor names, amounts and authorizations are reviewed before the payments are released.	RCD34	Review - Approval of Transactions	Management review accounting records periodically to ensure only authorized approved entries and adjustments are being made.	2



#### Control Activity Library

	C tret	Select	pencil" to Edit Detailed Description	Control Importance	Control Type	Control Frequency	Control Placement	Automation	Control Utilized
1		Accounting System - Automated interface between non-payroll subsystems and GL/AP	Non-Payroll (offline vouchers and spreadsheet journals) transactions automatically post to cash/liability accounts in the accounting system	Key	Green Book - Financial Reporting	Periodically as Needed	Prevent	Automated	N/A
	RCD23	Accounting System - Automated interface between Payroll and GL/AP	Payroll transactions automatically post to cash/liability accounts in the accounting system (in Teamworks upon release of labor distribution from HCM)	Key	Green Book - Financial Reporting	Periodically as Needed	Prevent	Automated	Yes
ľ	RCD29	Accounting System - Automated interface between revenue subsystems and GL/AP	Transactions automatically post to cash/receivable accounts (for example, in Teamworks from the AR module)	Key	Green Book - Fin		revent	Automated	🕑 Yes
	RCD13	Accounting System - Balanced journals (FSCM in control number)	Accounting system requires balanced entry for journals.		ans	trol Uti wers w	ill be		8 No
ľ	RCD17	Accounting System - Batch Processing	Routine batch processing is performed by accounting system that automatically edits and posts any entries not in valid and posted status and also produces an error report. Entries are posted to both the ledger and sub-ledger.		histo	red bas rical m odate a	apping	<b>/</b>	😢 No
	RCD4	Appropriate Documentation - Manual entries	Manual entries and adjustments are recorded in to the accounting records only when approved and accompanied by supporting documentation. (ONL entries in Teamworks)	Кеу		flect cu state.	urrent		😢 No
12	RCD7	Approval Delegation of Authority - Established	Delegation of Authority has been establish to identify personnel responsible for recording and adjusting item.	Key	Book - Financial Reporting	as Needed	Flevent	manual	😢 No



<i>•</i>	RCD7	Approval Delegation of Authority - Established	Delegation of Authority has been establish to identify personnel responsible for recording and adjusting item.	Key	Green Book - Financial Reporting	Periodically as Needed	Prevent	Manual	8 No
#*	RCD8	Approval of Transactions	Entries are approved consistent with Delegation of Authority prior to entry into accounting records, including opening of new bank accounts.	Key	Green Book - Financial Reporting	As Entered	Prevent	Manual	😢 No
P.3	RCD9	Bank Reconciliation	Reconciliations between bank and accounting record balances are performed accurately and timely (at least 30 days of month end).	Key	Green Book - Financial Reporting	Monthly	Detect	Manual	😢 No
A.2	ALL2	Cross-Training	Cross-training of staff to ensure there is backup for critical departmental functions.	Key	Green Book - Financial Reporting, Standard	Periodically as Needed	Prevent	Manual	<b>(3)</b> No
	• 1	2 • •						1 - 10	of 19 item
			Multiple Pages to Review						



#### N/A intended to be used only for items not applicable to Organization, such as:

- N/A for control activities relating to Inventory as your Organization has no inventory.
- N/A for control activities relating to year-end forms that your Organization is not required to complete.
- Etc.







But what if my control activity is **<u>not exactly</u>** the same as the one in the control activities library listing

- That is ok.....
  - For example, the standardized control in the library listing states: "Reconciliations between bank and accounting record balances are performed accurately and timely (at least 30 days of month end)."
  - But your organization does them every two weeks

It would be ok to still select that as your control activity relating to reconciliations.

#### **Control Activities Example - Expenditures**



Control Activity	Standard Control Activity
(per Organization RA/CA template)	(from software library listing)
Segregation of duties exists:	Different staff create requisitions,
different staff create requisitions,	generate purchase orders, approve
generate purchase orders, approve	expenditures, enters invoice and
expenditures, enters invoice and	mail out checks. (segregation of
mail out checks.	duties)
All expenses are entered and approved by program staff. Then expenses are reviewed and approved by budget staff, and if tied to a PO, by procurement staff, before being processed by AP staff.	Entries are approved consistent with Delegation of Authority (such as to evidence that goods/services were received, etc.) prior to entry into accounting records.
## **Control Activities Example - Expenditures**



Control Activity (per Organization RA/CA template)	Standard Control Activity (from software library listing)
Finance staff follow guidance and comply with SAO policies and procedures for allowable expenses and refer to the state chart of accounts for coding of expenditures.	Staff review accounting standards and guidance from SAO when recording entries and adjustments. (ensures proper measurability, etc.)
The Accounting Director reviews the Trial Balance by Fund (44P) monthly for mispostings.	Management reviews accounting records periodically to ensure only authorized approved entries and adjustments are being made.

#### **Onspring – Control Activities Details**



Details of Organization specific control activities will be included here.

#### Control Activity Details

Details of Control Activities will be included here.

Previous answers from excel templates will be uploaded... Update answers to reflect current state.



# <u>Residual Risk</u> – Risk that remains after management's response to inherent risk

Considering **known control activities** (internal controls) actually occurring, analyze the *level of the remaining risk* for each of the specific risk examples.

# When answering in Onspring, certain factors to contemplate, especially if a key control is missing:

Is there some sort of mitigating control activity in place

#### OR

There should be a plan to close that gap (by implementing the missing control activity)

# **Onspring – Residual Risk**





Risk Justifications are required and allow for free form entry.

# **Onspring Reporting**



### **Onspring Heat Map – Likelihood and Impact**



Or	Ispring			Dashboards	Reports Content			Search	₽ Help	
🖶 Viev	ving: Agency Reporting	Risk Managen	nent Risk Assessme	ents and Control Activities						
Неа	t Map - Agency Vie	ew								=
-	High							5		
Likelihood	Medium					2				
Ĕ	Low N/A			1		1				
		N/A		Low		Medium		High		
					Impact					
		• 1	4		8		12	,	•) 16	
	Assessing Organization	Agency Risk Sta	atement*	Related Risk Question Library	Specific Risk Examples*	Impact	↑ Likelihood	Residual Risk	t	
	00001	the prop fund, in	ets are not all recorded at er amount, in the proper the proper account code proper basis of ing.	3	Recording - Cash (e.g. cre- lockbox collections, cash o LGIP, investments, etc.) that valid (such as cash that do exist) is recorded in the accounting records.	n hand, at is not	🛑 High	🛑 High		
Ľ	00001	the prop fund, in	ets are not all recorded at er amount, in the proper the proper account code proper basis of ing.	5	Recording - Receivables at all included in the accounting records.	re not 🔶 High ng	🛑 High	• Low		
	<u>00001</u>	the prop	ets are not all recorded at er amount, in the proper the proper account code	<u>6</u>	Recording - Receivables and recorded at the correct and the accounting records.	re not ounts in	igh High	Low		-
									1 - 10 of 10 items	5

### **Onspring Heat Map – Likelihood and Impact**





# **Onspring Residual Risk Graph**



#### **Residual Risk - Agency View**



Residual Risk

	Agency ID	Risk Statement*	Related Risk Question	Specific Risk Examples*	Inherent Risk	Likelihood	Impact	Response	Residual Risk	t	
Ľ	00001	Key assets are not all recorded at the proper amount, in the proper fund, in the proper account code or in the proper basis of accounting.	3	Recording - Cash (e.g. credit card, lockbox collections, cash on hand, LGIP, investments, etc.) that is not valid (such as cash that does not exist) is recorded in the accounting records.	● High	● High	High	Acceptance	● High		
	00001	Information provided on year end forms does not agree with accounting records and/or supporting documentation.	<u>83</u>	Reporting - Investment Form: - appropriate research not done to include all needed items		N/A	Low	Acceptance	Low		
	00001	Key assets are not all	2	Recording - Cash (e.g.	🔴 High	Low	Low	Acceptance	Low	-	
	1 - 10 of 10 items										

₽

# **Onspring Residual Risk Graph**





# **Onspring – Other Report Options**



Most every Onspring page has option to export to excel or print the information.



## **Example - Excel export of Heat Map**



State Accounting Office



Agency ID	Agency Name	Related Risk Question Library Record	Specific Risk Examples*	Inherent Risk	Likelihoo d	Impact	Residual Risk	Updated By	Updated Date
00001	Test Org	2	Recording - Cash (e.g. credit card, lockbox collections, cash on hand,	High	Low	Low	Low		3/20/2020 1:54 PM
00001	Test Org	3	Recording - Cash (e.g. credit card, lockbox collections, cash on hand,	High	High	High	High		3/11/2020 2:59 PM
00001	Test Org	4	Recording - Cash (e.g. credit card, lockbox collections, cash on hand,	Medium	Low	Medium	Low		3/11/2020 2:59 PM
00001	Test Org	5	Recording - Receivables are not all included in the accounting record	High	High	High	Low		3/12/2020 7:18 AM
00001	Test Org	6	Recording - Receivables are not recorded at the correct amounts in	t High	High	High	Low		3/12/2020 7:18 AM
00001	Test Org	7	Recording - Receivables that are not valid (such as receivables that a	High	High	High	Low		3/12/2020 7:18 AM
00001	Test Org	8	Recording - Receivables are not recorded in the correct chartfields i	r High	High	High	Low		3/12/2020 7:18 AM
00001	Test Org	9	Recording - Receivables, by fund type, are not recorded in accordan	Medium					3/11/2020 2:59 PM
00001	Test Org	10	Recording - Inventory is not all included in the accounting records.	High	Medium	Medium	Low		3/11/2020 2:59 PM
00001	Test Org	11	Recording - Inventory is not recorded at the correct amounts in the	High	Medium	Medium	Low		3/11/2020 2:59 PM
00001	Test Org	12	Recording - Inventory that is not valid is included in the accounting	records (su	ich as amou	unts are in	cluded that	do not phys	3/11/2020 2:59 PM



## The Green Book is available on GAO's website at: <u>www.gao.gov/greenbook</u>

#### SAO's website:

#### https://sao.georgia.gov/policies-and-procedures/internalcontrols

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